

# Appendix B5

## Heritage Management Sub Plan

Parramatta Light Rail – Stage 1  
Package 2: Westmead Precinct Works

PLR-HAC-HRW-PE-PLN-000005: Revision 7  
February 2020

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Appendix B - Consultation

Appendix B1 – Activity A: Hawkesbury Road Widening

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## Document control

### Approval and authorisation

<b>Title</b>	Parramatta Light Rail – Stage 1, Package 2, Heritage Management Plan
<b>Endorsed by Environment Representative</b>	
<b>Signed</b>	
<b>Dated</b>	
<b>Approved on behalf of Transport for NSW Services by</b>	
<b>Signed</b>	
<b>Dated</b>	
<b>Approved on behalf Ford Civil Contracting (Activity A: Hawkesbury Road Widening Works) by</b>	
<b>Signed</b>	
<b>Dated</b>	
<b>Approved on behalf Renascent (Activity B: Cumberland Hospital (East Campus) Demolition) by</b>	
<b>Signed</b>	
<b>Dated</b>	

Approved on behalf of Donnelley Construction (Activity C: Cumberland Hospital (West Campus) Demolition) by	
Signed	
Dated	

## Document status

Revision	Date	Description	Approval
A	Dec 2018	First draft: issued for comment.	
B	Jan 2019	Second draft: Comments from consultation incorporated.	
C	March 2019	Third Draft: Comments from ER Incorporated.	
D	March 2019	Fourth Draft: Comments from ER Incorporated.	
0	March 2019	Issue to DPIE.	ER endorsement for Activity A provided 26 March 2019
1	March 2019	Issue to DPIE after Heritage Council and Parramatta Council close-out of comments.	
2	May 2019	Response to DPIE comments.	
2.1	August 2019	Response to further DPIE comments.	
3	August 2019	Final for issue	Approved for use for Activity A on 13 August 2019
3.1	July 2019	Inclusion of Activity B and C – sent to Government Stakeholders for comment	
4	August 2019	Inclusion of Activity B and C – Government stakeholder comments incorporated and submitted to Environmental Representative for comment	
4.1	October 2019	Updated to address ER comments	
4.2	November 2019	Update to address additional ER comments	
5	November 2019	Issued to DPIE	
6	January 2020	DPIE comments incorporated	
7	February 2020	DPIE comments incorporated and final for issue for all Activities	Approved for use for Activity A, B and C on 7 February 2020.

### **Distribution of controlled copies**

This Heritage Management Sub Plan (HMP), as part of the Construction Environmental Management Plan (CEMP), is available to all personnel and sub-contractors via the Project document control management system (Aconex). An electronic copy can be found on the Project website.

The document is uncontrolled when printed. One controlled hard copy of the HMP, as part of the CEMP, and supporting documentation will be maintained by the Quality Manager at the Project office and on the Project website.

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# Glossary/Abbreviations

Abbreviations	Expanded text
AHIMS	Aboriginal Heritage Information Management System
ARD	Historical Archaeological Research Design and Excavation Methodology
CEMP	Construction Environmental Management Plan
CoA	Condition of Approval
Contractor, The	The company engaged to undertake the Project work. Activity A: Ford Civil Contracting Pty Ltd Activity B: Renascent Australia Pty Ltd Activity C: Donnelley Constructions Pty Ltd
CoPC	City of Paramatta Council
CSSI	Critical State Significant Infrastructure
DPE	NSW Department of Planning and Environment Where reference in the planning approval/ this document and consultation has been made to DPE it should be noted that it has been abolished from 1 July 2019. References made to the Department of Planning and Environment is construed as a reference to the Department of Planning, Industry and Environment (DPIE).
DPIE	Department of Planning, Industry and Environment
ECM	Environmental Control Maps
EIS	Environmental Impact Statement
EIA	Environmental Impact Assessment
Environmental heritage	Places, buildings, works, relics, movable objects and precincts, of State or local heritage significance as outline in Section 4 of the <i>Heritage Act 1977</i>
ER	Environmental Representative
REMMM	Revised Environmental Mitigation and Management Measures
HAMU	Historical Archaeological Management Unit
Heritage Act	<i>Heritage Act 1997</i>
Heritage DPC	Heritage Division of the Department of Premier and Cabinet



Abbreviations	Expanded text
HMP	Heritage Management Sub Plan
HAMU	Historical Archaeological Management Unit
MM	Management Measures
OEH	Office of Environment and Heritage  Where reference in the planning approval/ this document and consultation has been made to OEH it should be noted that it has been abolished from 1 July 2019. The Environment section is construed as a reference to Department of Planning, Industry and Environment and the heritage component is construed as a reference to Department of Premier and Cabinet (DPC).
PAD	Potential Archaeological Deposit
Project, the	Hawkesbury Road Widening Works  The works to which this Plan applies. Road works between Darcy Road and Jessie Street along Hawkesbury Road.
RAP	Registered Aboriginal Party
Secretary	Secretary of the NSW Department of Planning, Industry and Environment (or delegate)
SPIR	Parramatta Light Rail (Stage 1) Westmead to Carlingford via Parramatta CBD and Camellia Submissions Report (incorporating Preferred Infrastructure Report)
SHR	State Heritage Register

# 1 Introduction

This section describes the context for this Plan and the scope of works to which it applies.

## 1.1 Context

This Heritage Management Sub Plan (HMP or Plan) forms part of the Construction Environmental Management Plan (CEMP) for the Package 2: Westmead Precinct Works for Parramatta Light Rail – Stage 1.

There are three activities to be carried out as part of Package 2.

- Activity A: Hawkesbury Road Widening Works
- Activity B: Cumberland Hospital (East Campus) Demolition
- Activity C: Cumberland Hospital (West Campus) Demolition

The scope of works for each of these activities is listed in 1.2.2, 1.2.3 and 1.2.4 respectively. These activities are enabling works which need to be carried out prior to the Main Infrastructure Works for Parramatta Light Rail – Stage 1 and are the subject of this plan.

A description of the overall Parramatta Light Rail – Stage 1 (Westmead to Carlingford) (PLR) is provided in Section 1.2.

The PLR received planning approval on the 29 May 2018 (SSI 8285). This HMP has been prepared to address the requirements of the Minister's Conditions of Approval (CoA) and the revised environmental mitigation and management measures (REMMMs) listed in the Parramatta Light Rail Stage 1 Westmead to Carlingford via Parramatta CBD and Camellia Environmental Impact Statement (the EIS), as amended by the Parramatta Light Rail (Stage 1) Westmead to Carlingford via Parramatta CBD and Camellia Submissions Report (incorporating Preferred Infrastructure Report) (February 2018) (the SPIR) and all applicable legislation.

## 1.2 Background and project description

### 1.2.1 Parramatta Light Rail – Stage 1

Parramatta Light Rail is one of the NSW Government's major infrastructure projects being delivered to serve a growing Sydney.

Parramatta Light Rail - Stage 1 will connect Westmead to Carlingford via Parramatta Central Business District (CBD) and Camellia. Stage 1 is expected to be operational in 2023.

The Project will create new communities, connect great places and help both local residents and visitors move around and explore what the region has to offer.

The key features of the Project include:

- A new dual track light rail network of about twelve (12) kilometres in length, including around seven (7) kilometres within the existing road corridor and around five (5) kilometres within the existing Carlingford Line and Sandown Line, replacing current heavy rail services
- Sixteen (16) Stops that are fully accessible and integrated into the urban environment including a terminus stop at each end of Westmead and Carlingford
- High frequency 'turn-up-and-go' services operating seven days a week from 5am to 1am. Weekday services will operate about every 7.5 minutes in the peak period between 7am and 7pm

- Intermodal interchanges with existing public transport services at Westmead terminus, Parramatta CBD and the Carlingford terminus
- Alterations to the existing road network including line marking, additional traffic lanes and turning lanes, new traffic signals, and changes to traffic flows
- Relocation and protection of existing utilities
- Public domain and urban design works along the corridor and at Stop precincts
- Active transport corridors and additional urban design features along sections of the alignment and within Stop precincts
- Integration with the Opal Electronic Ticketing System
- Real time information in light rail vehicles and at Stops via visual displays and audio.

Figure 1-1 provides an overview of Parramatta Light Rail Stage 1 route.



Figure 1-1: Parramatta Light Rail Stage 1 route

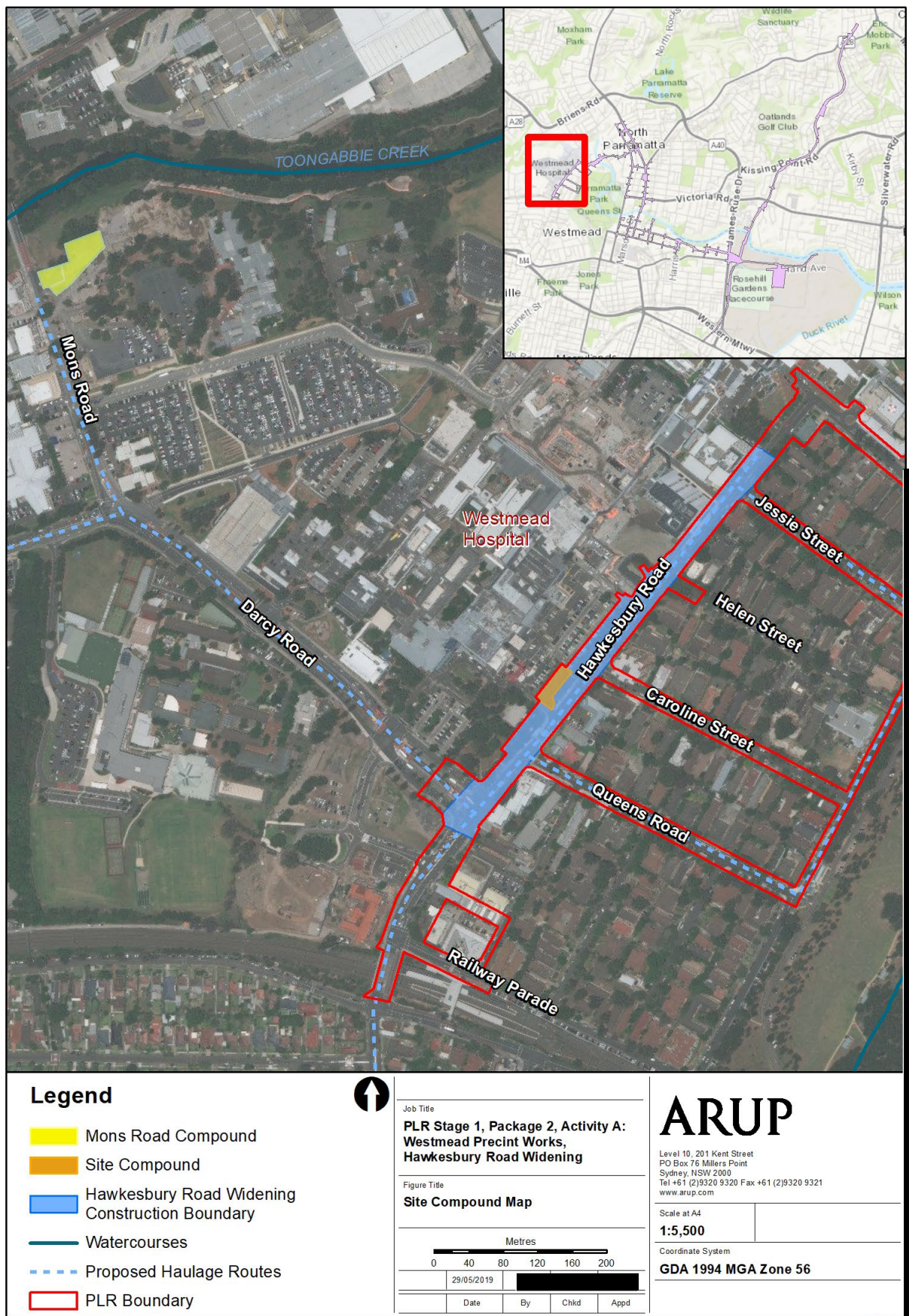
### 1.2.2 Activity A: Hawkesbury Road Widening Works

The Hawkesbury Road Widening Works (located between Darcy Road and Jessie Street) (shown in Figure 1-2) will be carried out as the first activity under Package 2 of the PLR.

These works are necessary due to the identified potential conflicts between the PLR works and the planned NSW Health development on Hawkesbury Road, within the Westmead Hospital Property Boundary. The Hawkesbury Road Widening Works includes services relocations to suit the new road and footpath alignment, new road and footpath construction on the western side of Hawkesbury Rd, with a provision of a retention piled wall with a cantilevered footpath that caters for the proposed National Particle Therapy Research Centre development. By providing the widening of the western side of Hawkesbury Road, the disruptions on Hawkesbury Road during the main PLR works would be minimised.

The Contractor undertaking this work is Ford Civil Contracting Pty Ltd.





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Figure 1-2: Hawkesbury Road Widening construction area



### 1.2.3 Activity B: Cumberland Hospital (East Campus) Demolition

The Cumberland Hospital (East Campus) Demolition (shown in Figure 1-3) will be carried out as the second activity under Package 2 of the PLR.

The Cumberland Hospital (East Campus) demolition includes demolition of five buildings down to slab<sup>1</sup> along the alignment of the PLR through Cumberland Hospital (East Campus). The works will also include capping of utilities and services to these buildings, including Jemena gas pipelines, and reconnection of IT services to building 52 where required.

The Contractor undertaking this work is Renascent Australia Pty Ltd.

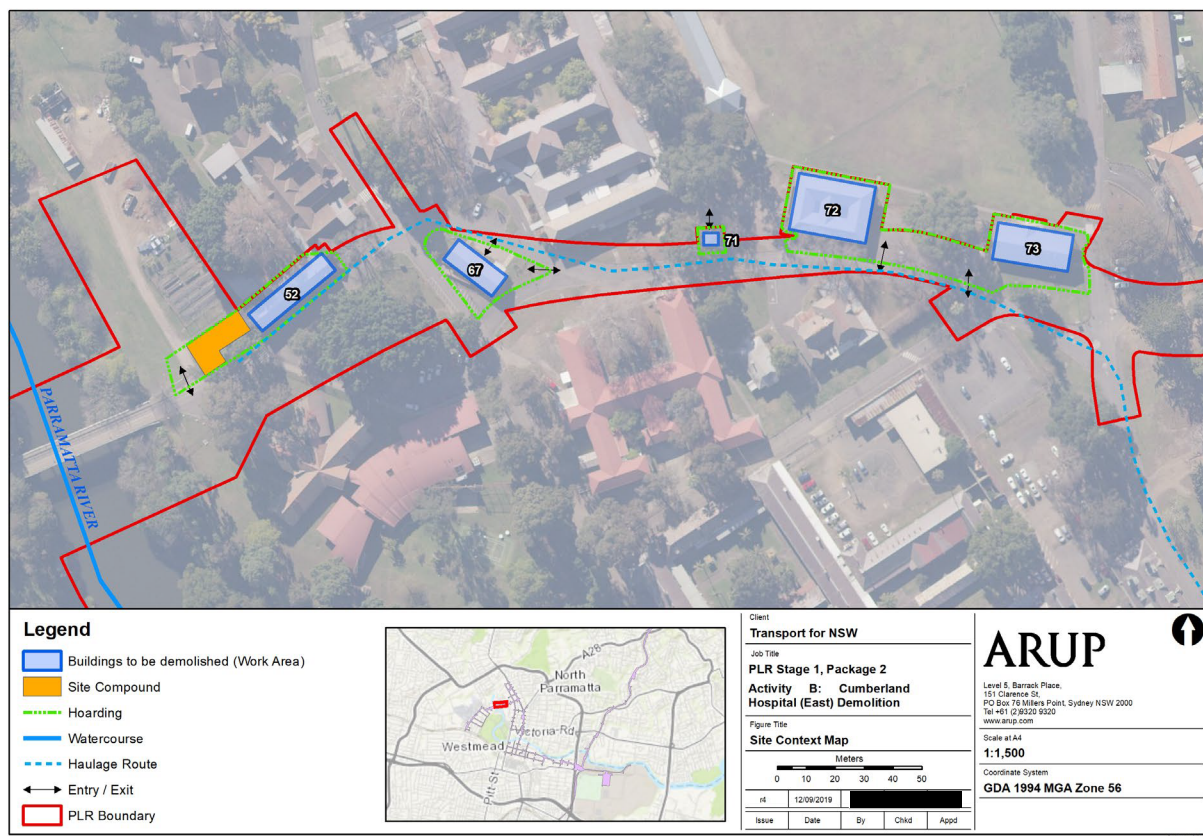


Figure 1-3: Cumberland Hospital (East Campus) demolition area

### 1.2.4 Activity C: Cumberland Hospital (West Campus) Demolition

The Cumberland Hospital (West Campus) Demolition (shown in Figure 1-4) will be carried out as the third activity under Package 2 of the PLR.

These works are necessary due to identified potential conflicts between the PLR works and planned NSW Health development within the Cumberland Hospital (West Campus).

The Cumberland Hospital (West Campus) demolition includes demolition of six buildings down to slab<sup>1</sup> along the alignment of the PLR through Cumberland Hospital (West Campus). These buildings include five cottages adjacent to Hainsworth Street and the Boronia Ward which is close to the Parramatta River. Demolition of the cottages will be carried out during stage one, the Boronia Ward will be demolished as a second stage of works as the ability to demolish the Boronia Ward relies on a new ward being constructed by NSW Health on adjacent land. Unlike the

<sup>1</sup> No demolition or excavation would occur under slab

Cumberland Hospital (East Campus), this activity does not include capping of utilities and services to buildings.

Both stages of work will be completed prior to the construction of the main infrastructure works. The Contractor undertaking this work is Donnelley Constructions Pty Ltd.

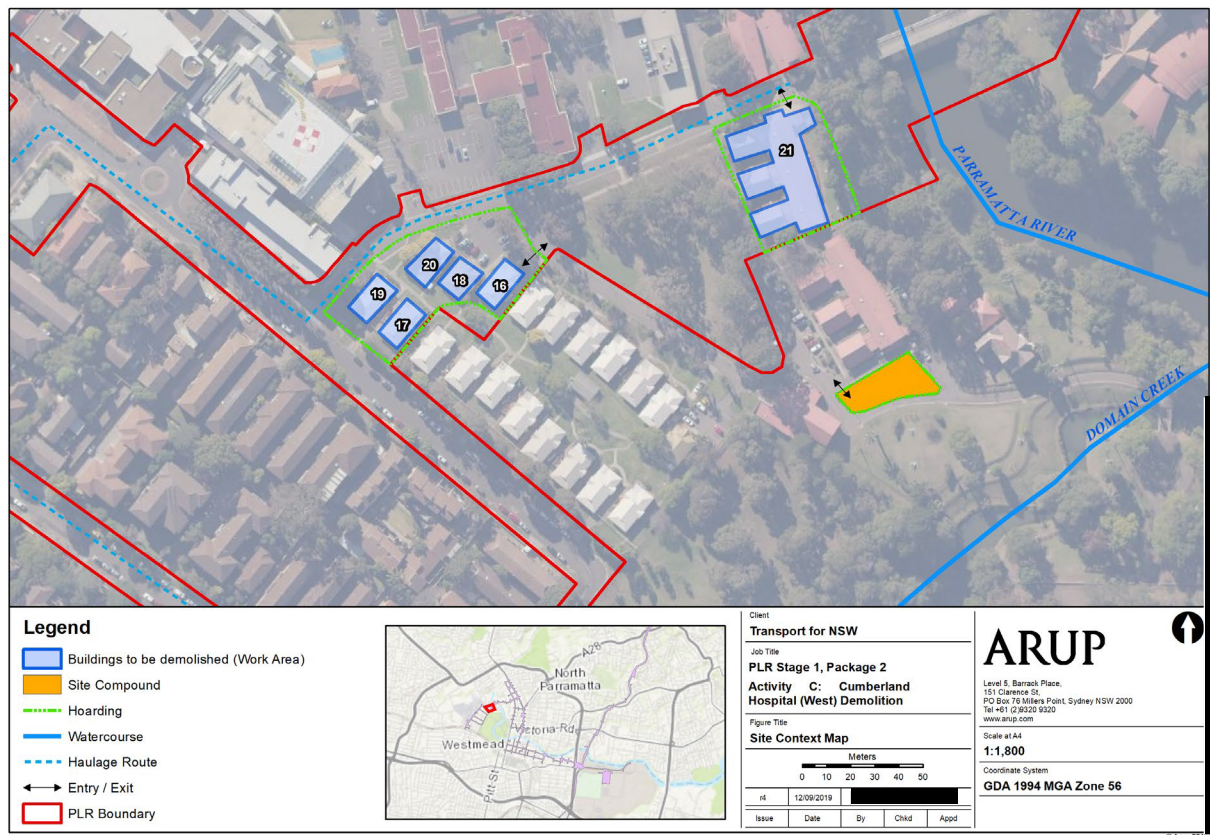


Figure 1-4: Cumberland Hospital (West Campus) demolition area

## 1.3 Statutory context

The Parramatta Light Rail was subject to environmental impact assessment (EIA) under the *Environmental Planning and Assessment Act 1979*. It is classified as Critical State Significant Infrastructure (CSSI).

Before work can start on the Project, detailed EIAs have been carried out and approved by the Minister for Planning. The Planning Approval for the project is described below.

### 1.3.1 Parramatta Light Rail planning approval

The Environmental Impact Statement (EIS) assessed the impacts of constructing and operating Stage 1. This covered the light rail and associated works including road enabling work as described in Section 1.2.1. The Minister for Planning approved the planning application on 29 May 2018.

The Infrastructure approval (SSI: 8285), planning assessment report, and related environmental assessment documents are located at:

[http://majorprojects.planning.nsw.gov.au/index.pl?action=view\\_job&job\\_id=8285](http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8285)

## **1.4 Scope of the sub-plan**

This Plan applies to the Works as described in Section 1.2.2, 1.2.3 and 1.2.4, to allow road widening along Hawkesbury Road between Darcy Road and Jessie Street and demolition of buildings within the Cumberland Hospital Precinct. The scope of this sub plan is to manage the enabling and construction works to avoid any heritage impacts. This document forms one of several pre construction works packages to be undertaken prior to the main PLR infrastructure construction commencing.

## **1.5 Environmental management systems overview**

Section 1.6 of the CEMP describes the Environmental Management System overview.

## **1.6 Consultation for preparation**

As per CoA C3(d), this Plan has been prepared in consultation with the Department of Premier and Cabinet (DPC), formerly the Office of Environment and Heritage (OEH), and City of Parramatta Council (CoPC) (refer to Section 4.2). Registered Aboriginal Parties (RAP) consultation is not required as no areas of Aboriginal archaeological potential, or Aboriginal sites would be impacted by the project. Appendix B provides the full consultation details in accordance with CoA A5.



## 2 Purpose and objectives

This section describes the purpose, objectives and targets of this Plan.

### 2.1 Purpose

The purpose of this Plan is to describe how Aboriginal and Non-Aboriginal heritage will be protected and managed during the Project in accordance with the CoA and REMMMs.

### 2.2 Objectives

The key objective of the Plan is to ensure all CoA, REMMMs and licence/permit requirements relevant to Aboriginal and non-Aboriginal heritage are described, scheduled and assigned responsibility as outlined in:

- The EIS prepared for Parramatta Light Rail – Stage 1.
- CoA granted to the project on 29 May 2018.
- Transport for NSW's Unexpected Heritage Finds Guideline 3TP-SD-115/3.0.
- The SPIR
- The modified CoA approved on the 21 December 2018.

Compliance with the CSSI approval is also an objective of the plan.

### 2.3 Targets

The following targets have been established for the management of Aboriginal and non-Aboriginal heritage impacts during the Project:

- Comply with the relevant legislative requirements, CoA and REMMM
- Avoid impacts on known Aboriginal and Non-Aboriginal heritage items
- Follow procedure and ensure notification of any heritage objects/places uncovered during construction in accordance with the TfNSW Unexpected Heritage Finds Guideline included in Appendix A
- Provide heritage awareness training to all personnel including sub-contractors as part of the induction training before they start work onsite and in toolbox talks throughout construction
- Ensure Aboriginal Cultural Heritage Awareness Training is provided to all personnel in the form of inductions before they begin work on-site
- Comply with the Historical Archaeological Research Design (ARD) and Excavation Method when working in or near Historical Archaeological Management Units (HAMUs).
- Consult with relevant stakeholders throughout the project in accordance with approval requirements
- Identify, investigate, record and assess the significance of any Aboriginal and non-Aboriginal archaeological resources before any further action, including harm, can take place
- Respond to the requirement not to destroy, modify or otherwise physically effect heritage items (including Aboriginal objects), outside the CSSI footprint

# 3 Environmental requirements

This section describes the legal requirements that apply to this sub-plan.

## 3.1 Relevant legislation and guidelines

### 3.1.1 Legislation

Legislation relevant to heritage management includes:

- NSW *Environmental Planning and Assessment Act 1979*
- NSW *Heritage Act 1977 (Heritage Act)*
- Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*.

All relevant legislative provisions are included in Appendix A1 of the CEMP.

### 3.1.2 Additional approvals, licences, permits and requirements

Other relevant planning approval related to the CoA are summarised in Section 3.2.

Note that the nominated Excavation Director for the project (Activities A, B and C) is Dr Iain Stuart of Artefact Heritage.

### 3.1.3 Guidelines

The main guidelines, specifications and policy documents relevant to this Plan include:

- Altering Heritage Assets (Heritage Office and NSW Department of Urban Affairs and Planning 1996).
- Code of Practice for the archaeological investigation of Aboriginal objects in NSW (OEH 2010)
- Aboriginal cultural heritage consultation requirements for proponents 2010 (OEH 2010)
- Due Diligence Code of practice for protection of Aboriginal objects in NSW (OEH 2010)
- Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW (OEH 2010)
- Assessing Heritage Significance (NSW Heritage Office 2001)
- Levels of Heritage Significance (NSW Heritage Office 2008)
- Assessing Significance for Historical Archaeological Sites and Relics (NSW Heritage Branch, Department of Planning 2009)
- Investigating Heritage Significance (NSW Heritage Office 2001)
- NSW Government's Aboriginal Participation in Construction Guidelines (2007).
- How to Prepare Archival Recording of Heritage Items (Heritage Branch 1998).
- Photographic Recording of Heritage Items Using Film or Digital Capture (Heritage Branch 2006).
- Guidelines for the Management of Human Skeletal Remains under the Heritage Act 1977
- Transport for NSW Unexpected Heritage Finds Guideline 3TP-SD-115/3.0

## 3.2 Minister's Conditions of Approval

Table 3-1 lists the CoA relevant to the HMP and Project scope of work. A cross reference is also included to indicate where the condition is addressed in this Plan or other Project management documents. Only the heritage conditions relevant to the scope of this sub plan are included in Table 3-1.

Table 3-1: Conditions of Approval relevant to the HMP

CoA No.	Condition Requirements	Document Reference	How Addressed
A1	<p>The CSSI must be carried out in accordance with the terms of this approval and generally in accordance with the description of the CSSI in the <i>Parramatta Light Rail (Stage 1) Westmead to Carlingford via Parramatta CBD and Camellia Environmental Impact Statement</i> (dated August 2017) (the EIS) as amended by:</p> <p>(a) the <i>Parramatta Light Rail (Stage 1) Westmead to Carlingford via Parramatta CBD and Camellia Submissions Report (incorporating Preferred Infrastructure Report)</i> (February 2018, the SPIR).</p> <p>(b) SSI 8285 Administrative modification (November 2018) (MOD); and</p> <p>(c) SSI 8285 Correction to Administrative modification (January 2019) (MOD 2).</p>	This table	This condition is provided as context for condition C1
A5	<p>Where the terms of this approval require a document or monitoring program to be prepared or a review to be undertaken in consultation with identified parties, evidence of the consultation undertaken must be submitted to the Secretary with the document or monitoring program or review. The evidence must include:</p> <p>(a) documentation of the engagement with the party(ies) identified in the relevant condition of approval before submitting the document for approval;</p> <p>(b) log of the points of engagement or attempted engagement with the identified party(ies) and a summary of the issues raised by the identified party(ies);</p>	<p>Section 4</p> <p>Appendix B</p>	<p>Section 4 identifies the relevant parties contacted for consultation for all activities</p> <p>Appendix B includes documentation of</p> <p>(a) engagement with parties,</p> <p>(b) log of engagement with parties and issues raised,</p> <p>(c) documentation of follow-up with parties,</p>

CoA No.	Condition Requirements	Document Reference	How Addressed
	<p>(c) documentation of any follow-up with the identified party(ies), where feedback has not been provided, to confirm that the identified party(ies) has none or has failed to provide feedback after repeated requests;</p> <p>(d) outline of the issues raised by the identified party(ies) and how they have been addressed, including evidence that the party(ies) is satisfied the issues have been addressed; and</p> <p>(e) where there are outstanding issues raised by the identified party(ies) that have not been adopted, the reasons why they have not been/could not be adopted must be provided, including evidence of consultation with the relevant party(ies).</p>		<p>(d) outline of issues raised, how addressed and evidence of close of consultation</p> <p>(e) any outstanding issues</p>
C1	A <b>Construction Environmental Management Plan</b> (CEMP) must be prepared to detail how the performance outcomes, commitments and mitigation measures specified in the documents listed in <b>Condition A1</b> will be implemented and achieved during construction.	This document is an appendix to the CEMP	This condition is provided as context for condition C3(d). The HMP outlines the management measures that will be implemented during construction to achieve the project performance outcomes and commitments.
C3 (d)	<p>The following <b>CEMP Sub-plans</b> must be prepared in consultation with the relevant government agencies identified for each <b>CEMP Sub-plan</b> and be consistent with the CEMP referred to in <b>Condition C1</b>:</p> <p>(d) Heritage; for approval; must be prepared in consultation with the relevant Council(s), OEH.</p>	This document Consultation with relevant parties is set outlined in Section 4.2 and Appendix B.	This whole document is relevant for compliance with the condition. Consultation with relevant government stakeholders are outlined in Section 4.2 detailed in Appendix B.
C4	The CEMP Sub-plans must state how:		
	(a) the environmental performance outcomes identified in the documents listed in <b>Condition A1</b> will be achieved;	This document, Table 3-3	Environmental performance outcomes are listed and addressed in Table 3-3.

CoA No.	Condition Requirements	Document Reference	How Addressed
	(b) the mitigation measures identified in the documents listed in <b>Condition A1</b> will be implemented	Section 3.3 Section 7	Section 3.3 describes the revised mitigation measure in Table 3-2.  Section 7 describes specific management measures (MM) that will be taken to address the measures in the documents listed in A1.
	(c) the relevant terms of this approval will be complied with; and	This document, Table 3-1	Conditions of approval are listed and addressed.
	(d) issues requiring management during construction, as identified through ongoing environmental risk analysis, will be managed	Appendix A2 and Section 3.13, CEMP  The ARD  Section 7	A project risk register with identified issues requiring management, including heritage, is held in Appendix A2 of the CEMP. The risks will undergo ongoing analysis at the weekly site meeting as described in Section 3.13, CEMP.  Archaeological Issues requiring management during construction are detailed in the ARD for Activities A and B.  Section 7 describes how heritage issues in the project will be managed

CoA No.	Condition Requirements	Document Reference	How Addressed
E43	<p><b>Vibration</b></p> <p>The Proponent must conduct vibration testing before and during vibration generating activities that have the potential to impact on heritage items to identify minimum working distances to prevent cosmetic damage. In the event that the vibration testing and monitoring shows that the preferred dose values for vibration are likely to be exceeded, the Proponent must review the construction methodology and, if necessary, implement additional mitigation measures.</p>	<p>Section 6.1.3, 6.2.3 and 6.3.3</p> <p>Noise and Vibration Management Plan (PLR-HAC-HRW-NV-PLN-000001)</p>	<p>The need for vibration monitoring is discussed in the Noise and Vibration Management Plan.</p>
E60	<p>The Proponent must not destroy, modify or otherwise physically affect heritage items (including Aboriginal objects), outside of the CSSI footprint.</p>	<p>Section 7</p>	<p>This is addressed as MM H2 and in the Environmental Control Maps (ECM).</p> <p>No works would occur outside areas approved for impacts. If unexpected Aboriginal objects are located the TfNSW Unexpected Heritage Finds Guideline would be followed.</p>
E61	<p>Nothing in this approval permits the Proponent to harm, modify, or otherwise impact human remains uncovered during the construction and operation of the CSSI.</p>	<p>Section 7 Appendix A</p>	<p>This is addressed as MM H3 and further detail on the procedure is provided in Appendix A.</p> <p>The Transport for NSW Unexpected Heritage Finds Guideline will be referred to in the CEMP and all induction documents and outlines processes to follow if human remains are located.</p>

CoA No.	Condition Requirements	Document Reference	How Addressed
E62	<p>An <b>Unexpected Heritage Finds Procedure</b> must be:</p> <ul style="list-style-type: none"> <li>a) prepared to manage unexpected heritage finds in accordance with any guidelines and standards prepared by the Heritage Council or NSW of OEH; and</li> <li>b) certified by a suitably qualified and experienced archaeologist or heritage specialist.</li> </ul> <p>The Procedure must be included in the <b>Heritage Management Sub-plan</b> required by <b>Condition C3</b>.</p> <p><i>Note: Human remains that are found unexpectedly during works are under the jurisdiction of the NSW State Coroner and must be reported to the NSW Police immediately.</i></p>	Appendix A of this document	<p>This is addressed as MM H3.</p> <p>Transport for NSW Unexpected Heritage Finds Guideline has been appended to this plan (Appendix A)</p> <p>The TfNSW Unexpected Heritage Finds Guideline is considered appropriate by the project archaeologists who have authored the Historical Archaeological Research Design and Excavation Methodology required by CoA E72.</p>
E63	<p>The <b>Unexpected Heritage Finds Procedure</b>, as submitted to the Secretary, must be implemented for the duration of construction and during operational maintenance works.</p>	This document, Section 8.2 and 8.5	<p>Addressed in MM H3: The Unexpected Heritage Finds Guideline (TfNSW, 2015) will be adopted throughout construction.</p> <p>Unexpected heritage finds are also treated as a reporting requirement.</p> <p>The Excavation Director (as the Heritage Advisor) would be notified of any unexpected finds and advise on management in accordance with the ARD.</p> <p>The Transport for NSW Unexpected Heritage Finds Guideline will be referred to in the CEMP and all induction documents.</p>

CoA No.	Condition Requirements	Document Reference	How Addressed
E64	<p>The Proponent must prepare a Heritage Interpretation Strategy before work (excluding archaeological excavation required under Condition E70 and E71) which impacts on the items identified below commence which identifies and interprets the heritage values and stories of Aboriginal and non-Aboriginal heritage items, archaeology and heritage conservation areas associated with the CSSI.</p> <p>The Heritage Interpretation Strategy must be prepared and implemented in consultation with OEH and the Heritage Council of NSW (or its delegate). The Heritage Interpretation Strategy must be submitted to the Secretary for information and include, but not be limited to a discussion of the key interpretive themes, stories, archaeological results, and messages proposed to interpret the history and significance of affected heritage items and heritage conservation areas including:</p> <p><b>(a) Parramatta Female Factory and Institutions Precinct within the Cumberland District Hospital Group</b></p> <p>(b) Lennox Bridge;</p> <p>(c) St Patrick's Roman Catholic Cemetery;</p> <p>(d) The Convict Lumberyard (Arthur Phillip High School site)</p> <p>(e) Ancient Aboriginal and Early Colonial Landscape (Robin Thomas Reserve);</p> <p>(f) Queen's Wharf Reserve and stone wall and potential archaeological site;</p> <p>(g) Dundas Railway Station Group;</p> <p>(h) Prince Alfred Square (and potential archaeological site);</p> <p>(i) Royal Oak Hotel and stables (and potential archaeological site);</p> <p>(j) Clyde Carlingford Rail Bridge abutments (Northern); and</p> <p>(k) Clyde Carlingford Rail Bridge abutments (Southern)</p>	Package 4: Heritage Interpretation Strategy (PLR-INF-TFNSW-PJT-EN-PLN-000001)	The Heritage Interpretation Strategy referred to in Condition E64, and triggered by Activity B, will be completed under the Package 4 and Supply, Operate and Maintain (SOM) works (in agreement with the Heritage Advisor for Package 4) and is not a requirement for implementation during Activity A, B or C.



CoA No.	Condition Requirements	Document Reference	How Addressed
E64a	Within six months of the completion of any archaeological excavation and archival recording, the Heritage Interpretation Strategy in <b>Condition E64</b> must be updated to include any additional heritage items identified and their interpretation.	Section 7, MM A1	The Heritage Interpretation Strategy referred to in Condition E64, and triggered by Activity B, will be completed under the Package 4 works and is not a requirement for implementation during Activity A, B or C. If unexpected finds of State significance or Aboriginal objects are located, they would be included in an update to the Package 4 and SOM Heritage Interpretation Strategy within 6 months.

CoA No.	Condition Requirements	Document Reference	How Addressed
E65	Identified impacts to heritage items and heritage conservation areas must be minimised through both detailed design and construction in consultation with the Heritage Council (or its delegate). The measures to manage this must be detailed in the <b>Heritage Management Sub-Plan</b> required by <b>Condition C3</b> .	<p>Section 5.1 Section 5.2 Section 5.3</p> <p>Section 7</p>	<p>Sections 5.1, 5.2 and 5.3 discuss heritage items and conservation areas in the vicinity of the Project. Section 6 discusses the impacts and Section 7 provides relevant MM.</p> <p>The MM details how impacts to heritage items and conservation areas will be minimised.</p> <p>MM HER-8 discusses the process for consultation with the Heritage Division of Department of Premier and Cabinet (Heritage DPC) to fulfil E65.</p> <p>Further consultation would be carried out should an unexpected find require significant changes to the detailed design.</p>

CoA No.	Condition Requirements	Document Reference	How Addressed
E66	<p><b>Non-Aboriginal Heritage</b></p> <p>The Proponent must not destroy, modify or otherwise physically affect any structures within the Cumberland District Hospital Group or the curtilage of the Parramatta Female Factory and Institutions Precinct, except as identified in the documents listed in <b>Condition A1</b>.</p>	<p>This is addressed as MM H2 and in the Environmental Control Maps (ECM).</p> <p>Section 5.2.3 and 5.3.3</p> <p>Section 7</p>	<p>Activities B and C are within the Cumberland District Hospital Group SHR curtilage. No works would occur within the Parramatta Female Factory and Institutions Precinct. The proposed demolition works are consistent with the CSSI approval. Project boundaries would be followed to avoid accidental impacts to elements not approved for impact.</p> <p>In accordance with MM HER-7 demolition and make good methodologies for the south wing of building 52 for Activity B would be reviewed by an appropriate heritage consultant who would advise on management of impacts to significant fabric directly adjacent to the demolition.</p>

CoA No.	Condition Requirements	Document Reference	How Addressed
E70	<p><b>Heritage Archival Recording and Salvage</b></p> <p>The Proponent must prepare a <b>Heritage Archival Recording and Salvage Report</b>, including photographic recording of heritage items which have been identified for demolition or modification in the documents referred to in <b>Condition A1</b> and outline the salvage to be undertaken from these items.</p> <p>Archival recording must be undertaken by a suitably qualified heritage specialist and prepared in accordance with NSW Heritage Office's <i>How to Prepare Archival Records of Heritage Items</i> (1998) and <i>Photographic Recording of Heritage Items Using Film or Digital Capture</i> (2006).</p> <p>Within 12 months of completing the archival recording, or as otherwise agreed with the Secretary, the Proponent must submit the <b>Heritage Archival Recording and Salvage Report</b> to the Department, the OEH, Heritage Council of NSW, Relevant Council(s), relevant local libraries and local historical societies in the local government area</p>	The Photographic Archival Recording Report (PLR-ARUP-HRW-HE-RPT-000002) and Salvage Strategy Report (PLR-ARUP-HRW-HE-RPT-000002) for Activities B and C.	<p>Applies to Activities B and C only</p> <p>MM HER-4 and HER-6 outline the process of recording and reporting under this condition.</p>
E71	<p>The Proponent must salvage material from heritage items identified in <b>Condition E70</b>. Following archival recording, the Proponent must identify options for sympathetic reuse of salvaged material (including integrated heritage displays) on the project or for other options for repository, reuse and display. Suitable repository location(s) must be established in consultation with Relevant Council(s) (or Registered Aboriginal Parties, where relevant). For any State Heritage-listed items or elements suitable for salvage, suitable repository location(s) must be determined in consultation with the Heritage Division of the OEH.</p> <p>Any residual items and materials (where appropriate) are to be made available, through a process to be developed by the Proponent in consultation with the relevant council(s), to landowners within the locality from where the material originated.</p>	The Photographic Archival Recording Report (PLR-ARUP-HRW-HE-RPT-000002) and Salvage Strategy Report (PLR-ARUP-HRW-HE-RPT-000002) for Activities B and C	<p>Applies to Activities B and C only</p> <p>MM HER-6 outlines the process of recording and reporting under this condition.</p>

CoA No.	Condition Requirements	Document Reference	How Addressed
E72	<p>Before works within Zone 1 and 2 Historical Archaeological Management Unit (HAMU), the Proponent must engage a suitably qualified archaeologist whose experience complies with the NSW Heritage Council's <i>Criteria for Assessment of Excavation Directors</i> (July 2011) (referred to as the Excavation Director) to oversee and advise on matters associated with historical archaeology (i.e. non-Aboriginal) and to prepare a <b>Historical Archaeological Research Design and Excavation Methodology</b>.</p> <p>Where the unexpected heritage finds procedure required by <b>Condition E62</b> is triggered in a zone 3 location, the Excavation Director must oversee its implementation.</p>	<p>The completed Historical Archaeological Research Design and Excavation Methodology (ARD) is provided as a separate document (PLR-HAC-HRW-PE-PLN-000008) for Activity A, and (PLR-ARUP-HRW-HE-RPT-000001) for Activity B</p> <p>Section 7</p>	<p>Applies to Activities A and B only as there will be no subsurface excavation in Activity C. Activity A has areas classified as Zone 2 and 3 whereas Activity B is defined as Zone 1.</p> <p>Requirement to write an ARD is addressed in MM HER1: A Historical Archaeological Research Design and Excavation Methodology (ARD) has been prepared by a suitably qualified archaeologist prior to commencement of works.</p> <p>MM HER1 also discusses obligations if the TfNSW Unexpected Heritage Finds Guideline is triggered in a Zone 3 location, the Excavation Director must oversee its implementation.</p>

CoA No.	Condition Requirements	Document Reference	How Addressed
E73	<p>The <b>Historical Archaeological Research Design and Excavation Methodology</b> must to be submitted to the Heritage Council of NSW (or its delegate) for review and comment before finalisation. The <b>Historical Archaeological Research Design and Excavation Methodology</b> must:</p> <ul style="list-style-type: none"> <li>(a) be consistent with NSW Heritage Council Guidelines including: <ul style="list-style-type: none"> <li>i. Archaeological Assessments (1996);</li> <li>ii. Assessing Significance for Historical Archaeological Sites and Relics (2009),</li> <li>iii. Skeletal Remains (1998), and</li> <li>iv. Historical Archaeological Code of Practice (2009);</li> </ul> </li> <li>(b) include provision for early physical investigation of areas of impact identified as likely to contain State significant archaeology in the research design to inform detailed design in these areas to avoid State significant archaeology. This must include, but not be limited to: <ul style="list-style-type: none"> <li>i. <del>St Patrick's Roman Catholic Cemetery;</del></li> <li>ii. <del>Ancient Aboriginal and Early Colonial Landscape / Robin Thomas Reserve; and</del></li> <li>iii. <del>The Parramatta Town Drains (where these alignments are unclear);</del></li> </ul> </li> <li>(c) provide for the detailed analysis of any archaeological relics discovered during the investigations;</li> <li>(d) include management options for discovered archaeological relics (including options for avoidance, salvage, and display or interpretation);</li> <li>(e) include procedures for notifying the Heritage Council of NSW (or its delegate) and Secretary of any relic as required under s146 of the <i>Heritage Act 1977</i>; and</li> <li>(f) if the findings of the investigations are significant, provide for the preparation and implementation of a heritage interpretation strategy.</li> </ul>	<p>The completed Historical Archaeological Research Design and Excavation Methodology (ARD) is provided as a separate document (PLR-HAC-HRW-PE-PLN-000008) for Activity A and (PLR-ARUP-HRW-HE-RPT-000001) for Activity B</p>	<p>Applies to Activities A and B only.</p> <p>The condition to write an ARD is addressed in MM HER2. This outlines the content that must be included in the ARD as per this CoA.</p> <p>Activity A</p> <p>Consultation with OEH as delegate of the Heritage Council of NSW. Comments were received from OEH on the draft copy and subsequently incorporated and closed out. This is included in Appendix A of the ARD.</p> <p>Activity B</p> <p>Consultation with the Heritage DPC. Comments were received from Heritage DPC on the draft copy and subsequently incorporated and closed out. This is included in Appendix A of the ARD.</p>

CoA No.	Condition Requirements	Document Reference	How Addressed
E74	Where excavation works are required in the vicinity of potential archaeological sites, the Excavation Director must be present to advise on archaeological issues and oversee excavation works. The Excavation Director must be given the authority to advise on the duration and extent of oversight required during excavation.	Section 7  Section 2.3, 3.2 and 3.3 of the ARD	Applies to Activities A and B only  The ARD defines that the Excavation Director would attend site where required to appropriately manage archaeological works, including the former reserved cemetery area. The Excavation Director would have the authority to advise on the duration and extent of oversight required during excavation. (Section 2.3, Section 3.2, and Section 3.3 of the ARD)
E75	In the event that non-Aboriginal or post-contact archaeological relics are discovered, the Proponent must prepare an <b>Archaeological Excavation Report</b> containing the findings of any excavations, including artefact analysis and the identification of a final repository of any relics. The report must be submitted to the Secretary, for information, within 12 months of completing all archaeological investigations, unless otherwise agreed with the Secretary. The <b>Archaeological Excavation Report</b> must also be submitted to the NSW Heritage Council, the local library and the local Historical Society in the local government area. A copy of the <b>Archaeological Excavation Report</b> must be provided with the relics.	Section 7  Section 8  ARD	Applies to Activities A and B only  Addressed as MM HER4: In the event that archaeological relics are discovered, an Archaeological Excavation Report will be prepared.  Addressed as a reporting requirement  Reporting of archaeological relics is also addressed as a requirement in ARD.

CoA No.	Condition Requirements	Document Reference	How Addressed
E76	<p><b>Aboriginal Heritage</b></p> <p>The Proponent must not harm, modify or otherwise impact Aboriginal objects associated with the CSSI except as authorised by this approval.</p>	Section 7	Addressed as MM H2: No Aboriginal or Non-Aboriginal heritage items outside the Project footprint or uncovered during construction may be destroyed or otherwise physically affected.
E77	<p>Where previously unidentified Aboriginal objects are discovered during construction of the CSSI, all work should stop in the affected area and a suitably qualified and experienced Aboriginal heritage expert should be contacted to provide specialist heritage advice. The measures to consider and manage this process must be specified in the <b>Heritage Management Sub-Plan</b> required by <b>Condition C3</b> and, where relevant, include registration in the OEH's Aboriginal Heritage Information Management System (AHIMS) register.</p>	Appendix A	<p>Addressed in TfNSW Unexpected Heritage Finds Guideline: Where unidentified objects are discovered work will cease and a suitably qualified expert will be contacted.</p> <p>As certified (by the Heritage Specialist) a copy of the Transport for NSW Unexpected Heritage Finds Guideline has been appended to this plan (Appendix A).</p>



CoA No.	Condition Requirements	Document Reference	How Addressed
E80	The Proponent must design and construct the CSSI in a manner that reduces visual and heritage setting impacts and ensures consolidation and rationalisation of kerbside infrastructure to avoid visual clutter.	Section 7	Hoarding would be provided during demolition to minimise temporary visual impacts in accordance with HER 12. The provision of kerbside infrastructure is not proposed as part of this package.

### 3.3 Revised Environmental Mitigation and Management Measures

Table 3-2 lists the REMMMs relevant to this Plan. This includes references to required outcomes, the timing of when the commitment applies relevant documents or sections of the environmental assessment influencing the outcome and implementation.

Table 3-2: Revised Environmental Mitigation and Management Measures relevant to this HMP

Ref #	Commitment	Timing	HMP Reference	How addressed?
HE-1	<p>Three archaeological management zones have been developed for the project to manage archaeology with varying levels of significance throughout the project corridor. The general mitigation and management measures to be applied to each management zone are outlined below. The precinct-specific measures identify which management zone(s) measures apply to each archaeological management unit (HAMU) within a precinct.</p> <p>» The following mitigation and management measures would be implemented for Zone 1 – State significant historical archaeology:</p> <ul style="list-style-type: none"> <li>• A heritage induction would be carried out for all contractors, to be developed as part of the heritage management plan.</li> <li>• An Archaeological Research Design (ARD) would be prepared by a qualified archaeologist in accordance with Heritage Division requirements, prior to the commencement of works. The ARD would outline a methodology for the investigation, monitoring and/or salvage of archaeological resources.</li> <li>• An excavation director who meets the NSW Heritage Branch requirements for</li> </ul>	Prior to, during and after Project works	ARD provided as a separate document	<p>Activities A and B only</p> <p>The ARD outlines a methodology for archaeological management including Excavation Director participation.</p>

Ref #	Commitment	Timing	HMP Reference	How addressed?
	<p>directing State significant archaeological investigations must manage the works.</p> <ul style="list-style-type: none"> <li>• Impact or removal is generally unacceptable for State significant archaeology identified as being highly intact and if proposed should be justified appropriately by the excavation director.</li> <li>• In situ retention of archaeological remains would be considered in accordance with the ARD as required.</li> <li>• The NSW Heritage Division would be notified should intact State significant relics be unexpectedly identified.</li> <li>• Public engagement, such as open days or media releases, would be considered where feasible to inform the public of the archaeological findings and proposed management measures.</li> <li>• Post-excavation reporting, artefact analysis and relics conservation would be carried out if relics are identified.</li> </ul> <p>» The following mitigation and management measures would be implemented for Zone 2 – Locally significant historical archaeology:</p> <ul style="list-style-type: none"> <li>• A heritage induction would be carried out for all contractors, to be developed as part of the heritage management plan.</li> <li>• An ARD would be prepared by a qualified archaeologist in accordance with</li> </ul>			

Ref #	Commitment	Timing	HMP Reference	How addressed?
	<p>Heritage Division requirements, prior to the commencement of works. The ARD would outline a methodology for the investigation, monitoring and/or salvage of archaeological resources.</p> <ul style="list-style-type: none"> <li>• Archaeological monitoring would be carried out by a suitably qualified excavation director, followed by open area salvage (if required).</li> <li>• Impact or removal is likely to be considered acceptable if appropriate mitigation and management measures are followed as outlined in the ARD.</li> <li>• Public engagement, such as open days, would be considered where feasible to inform the public of the archaeological findings and proposed management measures.</li> <li>• Post-excavation reporting, artefact analysis and relics conservation would be carried out if relics are identified.</li> </ul> <p>» The following mitigation and management measures would be implemented for Zone 3 – Nil-low archaeological resource present:</p> <ul style="list-style-type: none"> <li>• A heritage induction would be carried out for all contractors, to be developed as part of the heritage management plan.</li> <li>• Works are unlikely to impact on significant archaeological resources; however, an archaeologist would be</li> </ul>			

Ref #	Commitment	Timing	HMP Reference	How addressed?
	engaged should any unexpected potential archaeological remains be encountered in accordance with an unexpected finds procedure.			
HE-2	<p>Archaeological salvage excavation would not be carried out prior to the preparation of an ARD. For this project, it is likely that the archaeological research designs would recommend archaeological salvage in the following instances:</p> <ul style="list-style-type: none"> <li>» Where detailed archival research and understanding of modern disturbance (such as information to show the extent of previous sub-surface excavation, for example plans or drawings of a building's basement level(s)) needs to be supplemented with more site-specific (on-ground) information to better define the archaeological potential and/or significance of the site.</li> <li>» In areas where access for excavation activities is not restricted by buildings or other structures.</li> </ul> <p>Salvage excavation would generally be recommended in areas where there is a moderate to high potential for relics of local or State significance to be present. It would involve locating and recording any relics found prior to their removal by construction. Staged salvage excavation would be carried out after project approval.</p>	During Project works	ARD provided as a separate document	<p>Activities A and B only</p> <p>The ARD outlines a methodology for archaeological management including Excavation Director participation.</p>

Ref #	Commitment	Timing	HMP Reference	How addressed?
HE-3	<p>Archaeological monitoring (i.e. the monitoring of construction excavation activities by a qualified archaeologist) would be carried out as required in accordance with the ARD to record any significant remains uncovered during excavation. Examples of where archaeological monitoring may be required include:</p> <p>» Low impact construction activities (such as narrow trenching) in areas of moderate to high potential for local or State significant relics.</p> <p>Areas with low potential to contain remains of State significance.</p>	During Project works	ARD provided as a separate document	<p>Activities A and B only</p> <p>The ARD outlines a methodology for archaeological management including Excavation Director participation.</p>
HE-4	<p>As detailed design progresses, opportunities to avoid or further minimise impacts to identified archaeological sites of State and local significance would be considered and documented in the design report.</p> <p>The project design would be sympathetic to identified potential archaeological resources items (i.e. in archaeological management Zones 1 and 2) and, where reasonable and feasible, minimise impacts to those resources. The detailed design for sections of the project that would impact on known archaeological resources would be developed in consultation with a qualified archaeologist and relevant stakeholders as advised (e.g. the OEH and City of Parramatta Council).</p>	During detailed design	ARD provided as a separate document	<p>Activities A and B only</p> <p>The ARD outlines a methodology for archaeological management including test excavation. Results of test excavation and monitoring would be considered when considering avoidance of any significant archaeological remains located.</p>

Ref #	Commitment	Timing	HMP Reference	How addressed?
HE-5	An Exhumation Policy and Guideline would be prepared prior to construction as part of the heritage management plan, and would inform the unexpected finds procedure in relation to the unexpected discovery of human remains. It would be developed in accordance with the Guidelines for Management of Human Skeletal Remains (NSW Heritage Office, 1998).	Not applicable to Project works as all areas identified as having potential for human remains in the EIS are outside the enabling works boundary.	n/a	Activity A  The former reserve cemetery area identified in Section 5.1.4 was never consecrated. Therefore, the TfNSW Unexpected Heritage Finds Guideline would be sufficient to manage the risk of discovery of human remains during these works.
HE-6	<p>The mitigation and management measures for Zone 1 – State significant historical archaeology would apply to the following HAMU:</p> <p>» HAMU 4 – Cumberland Hospital (east).</p> <p>The mitigation and management measures for Zone 2 – Locally significant historical archaeology would apply to the following HAMUs:</p> <p>» HAMU 1 – Eastern side of Hawkesbury Road including the road corridor.</p> <p>» HAMU 2 – Western side of Hawkesbury Road including the road corridor.</p> <p>»HAMU 3 – Cumberland Hospital (west).</p>	During Project works	ARD provided as a separate document	<p>Activities A and B only</p> <p>The ARD outlines methodology for archaeological management.</p> <p>Activity C will not involve subsurface excavation</p>

Ref #	Commitment	Timing	HMP Reference	How addressed?
HE-7	<p>In relation to HAMU 4 – Cumberland Hospital (east), the following mitigation and management measures would be implemented:</p> <ul style="list-style-type: none"> <li>» Thorough archaeological investigation of potential archaeological remains associated with Mrs Bett's House and the Lunatic Asylum would be required prior to the proposed excavation works commencing in these areas as required in accordance with the Zone 1 archaeological management measures.</li> <li>» Alternative construction methods would be identified and considered for the Grose Street Drain (local significance). Should impact to a section of the drain be unavoidable, archaeological investigation of this area would be carried out prior to excavation works.</li> </ul>	During Project works	ARD provided as a separate document	<p>Activity B only</p> <p>The ARD outlines methodology for archaeological management.</p>
HE-13	<p>A moveable heritage item strategy would be prepared by a suitably qualified heritage consultant and include a comprehensive record of all moveable heritage. The moveable heritage item strategy would form part of a broader interpretation strategy for the project and would include the following items:</p> <ul style="list-style-type: none"> <li>» Cumberland District Hospital Precinct.</li> </ul>	Prior to enabling works commencing	Moveable heritage has been included in the salvage strategy for the enabling works	<p>Activity B only, items to be demolished in Activity C are contemporary and there are no moveable heritage items</p> <p>A moveable heritage strategy has been considered and included as part of the salvage strategy for Cumberland East enabling works</p>



Ref #	Commitment	Timing	HMP Reference	How addressed?
HE-14	<p>Prior to the commencement of construction, photographic archival recording and reporting would be carried out in accordance with the 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).</p> <p>The record would be prepared by a suitably qualified heritage consultant using archival-quality material. Records for State Heritage Register (SHR) listed items would be held at the NSW Heritage Council, the State Library and the owner of the asset. Records for locally-listed items would be held by the local council, the local library/studies and the owner of the asset.</p> <p>Specific items subject to archival recording would be documented as part of the heritage management plan and would include:</p> <p>» Cumberland District Hospital Precinct.</p>	Prior to enabling works commencing	<p>Archival recording report provided as a separate document</p> <p>PLR-ARUP-HRW-HE-RPT-000002</p>	<p>Activity B and C only as no listed items to be impacted for Activity A</p> <p>An archival recording report for the Cumberland Hospital Precinct has been prepared</p>

Ref #	Commitment	Timing	HMP Reference	How addressed?
HE-15	<p>Prior to total or partial demolition of heritage items or elements located within the boundaries of a heritage item, heritage fabric would be identified for salvage and reuse opportunities considered. Components of high and exceptional significance recommended for conservation and reuse would be listed within a salvage schedule to be incorporated within a Salvage Scheme for the project. The scheme would indicate appropriate storage locations as well as appropriate types of buildings and structures where the salvaged elements may be reused. This would apply to the following items:</p> <p>» Cumberland District Hospital Precinct.</p>	Prior to enabling works commencing	<p>Salvage strategy provided as a sperate document</p> <p>PLR-ARUP-HRW-HE-RPT-000003</p>	<p>Activity B only, items to be demolished in Activity C are contemporary and no significant fabric will be impacted. A salvage strategy for the Cumberland Hospital East Campus only has been prepared.</p>
HE-21	<p>An Aboriginal and non-Aboriginal Management Plan would be prepared as described in AB-2.</p> <p>In addition, archaeological monitoring of construction excavation activities would be carried out by a qualified archaeologist based on the archaeological research design to record any significant remains uncovered by excavation (in accordance with HE-3). Examples of where archaeological monitoring may be required include:</p> <p>» Low impact construction activities (such as narrow trenching) in areas of moderate to high potential for local or State significant relics.</p> <p>» Areas with low potential to contain remains of State significance.</p>	Prior to project works	This plan	<p>This plan meets the requirement for an Aboriginal and non-Aboriginal Management Plan</p> <p>Activities A and B only</p> <p>The ARD outlines methodology for archaeological management.</p>

Ref #	Commitment	Timing	HMP Reference	How addressed?
HE-22	The method for the construction methodology (including the for demolition of existing buildings and/or structures) would be developed to minimise direct and indirect impacts on adjacent and/or adjoining heritage items. This would include consideration of potential (including vibration related impacts), where identified in accordance with the Construction Noise and Vibration Management Plan.	Prior to project works	Noise and Vibration Management Plan.	<p>The noise and vibration assessment has been used to determine appropriate equipment selection to minimise potential vibration impacts. Therefore, no vibration intensive plant would be used for Activity B or C, and no vibration monitoring is required.</p> <p>Vibration monitoring is required for Activity A however this is to manage potential impacts on sensitive equipment rather than for heritage purposes.</p> <p>Building condition surveys will however be undertaken for the remnant portion of building 52, to allow any damage caused by demolition works (unrelated to vibration) to be identified and remediated.</p> <p>MM HER-7 outlines the requirements for the make good of the remnant portion of building 52.</p>

Ref #	Commitment	Timing	HMP Reference	How addressed?
AB-2	<p>An Aboriginal and non-Aboriginal heritage management plan would be prepared as part of the CEMP. Specific measures would be identified in consultation with NSW Office of Environment and Heritage (OEH) and other relevant government agencies. As relevant, the plan would be developed in consultation with Registered Aboriginal Parties.</p> <p>The objectives and strategies of the plan would include the following:</p> <ul style="list-style-type: none"> <li>» Minimise impacts on items or places of heritage value.</li> <li>» Procedures for carrying out salvage or excavation of heritage relics or sites (where relevant) and any recordings of heritage relics prior to works commencing that would impact the heritage relic or site.</li> <li>» Procedures for interpretation of heritage values uncovered during salvage or excavation during detailed design.</li> </ul>	Prior to project works	This Plan	<p>Aboriginal heritage management would be consistent with the overarching methodology outlined in the HMP although no identified areas of Potential Archaeological Deposit (PAD) would be impacted.</p> <p>This applies to Activities A and B only</p> <p>The ARD outlines methodology for non-Aboriginal archaeological management.</p>
AB-4	<p>Exclusion zones would be established during construction for the following partially impacted sites to protect the portion of the site located outside the project construction disturbance boundary:</p> <ul style="list-style-type: none"> <li>• Cumberland Hospital East.</li> <li>• Harris Street Footpath/Robin Thomas Reserve.</li> </ul>	During works	This plan	<p>As the Cumberland East Aboriginal site is not directly impacted by the works, inclusion on the ECM as a no-go zone would be required along with a barrier/fencing.</p> <p>No works, including traffic movement would occur within the designated</p>

Ref #	Commitment	Timing	HMP Reference	How addressed?
	Suitable controls would be identified in the heritage management plan and shown on the Environmental Control Maps (refer Transport for NSW Guide to Environmental Control Map), which may include barrier fencing to delineate the exclusion zones.			Aboriginal site. The site compound is directly adjacent to the site however the layout has been optimised to provide distance from the Cumberland Hospital East Aboriginal site where possible.
NV-7	<p>Where vibration intensive construction activities are proposed within 100 metres of sensitive receivers, these works would be confined to the less sensitive daytime period where possible. The potential impacts from vibration are to be considered in the site-specific Construction Noise and Vibration Impact Statements (to be developed during detailed design). In general, mitigation and management measures that would be considered include:</p> <ul style="list-style-type: none"> <li>• Relocate vibration generating plant and equipment to areas within the site in order to lower the vibration impacts.</li> <li>• Investigate the feasibility of rescheduling the hours of operation of major vibration generating plant and equipment.</li> <li>• Use lower vibration generating items of excavation plant and equipment (e.g. smaller capacity rock breaker hammers).</li> <li>• Minimise consecutive works in the same locality (if applicable).</li> </ul>	During works	Noise and Vibration Management Plan.	<p>The noise and vibration assessment has been used to determine appropriate equipment selection to minimise potential vibration impacts. Therefore, no vibration intensive plant would be used for Activity B or C, and no vibration monitoring is required.</p> <p>Vibration monitoring is required for Activity A however this is to manage potential impacts on sensitive equipment rather than for heritage purposes.</p> <p>MM HER-7 outlines the requirements for the make good of the remnant portion of building 52</p> <p>This would be accounted for in the demolition and make good methodology for</p>

Ref #	Commitment	Timing	HMP Reference	How addressed?
	<ul style="list-style-type: none"> <li>Use dampened rock breakers to minimise the impacts associated with rock breaking works.</li> </ul> <p>If vibration intensive works are required within the safe working distances, vibration monitoring or attended vibration trials would be carried out to ensure that levels remain below the cosmetic damage criterion.</p> <p>Building condition surveys would be completed both prior to the commencement of construction works and following the completion of construction works to identify existing damage and any damage due to the works.</p> <p>Measurements of existing ambient vibration levels would be carried out at receivers with vibration sensitive equipment during the detailed design. This information would be used to inform the site-specific Construction Noise and Vibration Impact Statements for works near these locations.</p>			building 52 as described in HER7
VL-17	<p>The footprint of construction compounds in open space areas would be minimised where feasible to reduce visual impacts. This includes the following areas:</p> <ul style="list-style-type: none"> <li>Westmead compound.</li> <li>Parramatta North Compound.</li> <li>Parramatta River Bridge (north).</li> </ul>	Prior to and during works	This plan	<p>HER10 requires that the extent of the compound site would be minimised as practicable.</p> <p>The extent of the site compound for Activity B has been optimised to minimise impacts on the Cumberland Hospital East Aboriginal site.</p>

### 3.4 Environmental Performance Outcomes

Table 3-3: Environmental Performance Outcomes relevant to this HMP

Ref #	Commitment	HMP Reference	How Addressed
EPO-HE-2	The project would be sympathetic to heritage items and, where feasible and reasonable, avoid and minimise impacts to non-Aboriginal heritage items and archaeology.	Section 7, Heritage Management Plan (PLR-HAC-HRW-PE-PLN-000005)	<p>Any unexpected heritage items will be appropriately managed using the TfNSW Unexpected Heritage Finds Guideline (Appendix A).</p> <p>Activities A and B only</p> <p>The ARD defines that the Excavation Director would attend site where required to appropriately manage archaeological works. The Excavation Director would have the authority to advise on the duration and extent of oversight required during excavation. (Section 2.3, Section 3.2, and Section 3.3 of the ARD)</p>

Ref #	Commitment	HMP Reference	How Addressed
EPO-AB-1	The project would be sympathetic to heritage items and, where feasible and reasonable, avoid and minimise impacts on Aboriginal heritage items and archaeology.	Section 7, Heritage Management Plan (PLR-HAC-HRW-PE-PLN-000005)	Any unexpected heritage items will be appropriately managed using the TfNSW Unexpected Heritage Finds Guideline (Appendix A).  Activities A and B only  The ARD defines that the Excavation Director would attend site where required to appropriately manage archaeological works. The Excavation Director would have the authority to advise on the duration and extent of oversight required during excavation. (Section 2.3, Section 3.2, and Section 3.3 of the ARD)
EPO-AB-2	Appropriate Aboriginal heritage interpretation would be incorporated into the design of the project in consultation with registered Aboriginal stakeholders.	Section 7, Heritage Management Plan (PLR-HAC-HRW-PE-PLN-000005)	Any information on Aboriginal objects discovered would be input into Heritage Interpretation Strategy for construction program



# 4 Consultation

This section describes consultation that has been undertaken in preparation of this Plan.

## 4.1 Consultation undertaken to date

Consultation has been carried out to develop project options, the concept and detailed design, and to prepare the EIS, submissions report and modification application.

Consultation and collaboration with Registered Aboriginal stakeholders has been integral to the assessment and management of Aboriginal cultural heritage for the project.

Consultation is outlined in the EIS in Chapter 4.

## 4.2 Consultation requirements under the infrastructure approval

CoA C3(d) requires that the HMP is prepared in consultation with the OEH and CoPC, while REMMM AB-2 commits to identifying specific management measures in consultation with OEH and relevant Government agencies (taken to be OEH and CoPC). Also, CoA E74 requires the NSW Heritage Council to review and comment on the ARD. NSW Heritage Council delegated this responsibility to NSW OEH.

Accordingly, a consultation workshop for Activity A was held with NSW OEH, CoPC and NSW Heritage Council on 17 December 2019 and 14 January 2019. The document was issued to stakeholders following the workshop for comment. Stakeholder comments were incorporated, and the document was reissued to close out comments. Appendix B provides the full consultation details.

A consultation workshop for Activity B and C was held on the 23 July 2019. Heritage DPC (formerly OEH) and CoPC were in attendance. Revision 3.1 of this document was issued to stakeholders following the workshop for comment. Stakeholder comments were incorporated, and the document was reissued to close out comments. Appendix B provides the full consultation details.

Heritage DPC have been consulted about impacts of the design on heritage significance during the preparation of the plan in order to fulfil E65. Heritage DPC would be consulted during construction if an unexpected heritage find was identified which required any change to the detailed design in accordance with E65.

# 5 Existing environment

The following section summarises what is known about Aboriginal and non-Aboriginal heritage within and next to the Project footprint as detailed in the EIS.

## 5.1 Activity A: Hawkesbury Road Widening

### 5.1.1 Historical Archaeological Management Units

The Project EIS (Technical Paper 11) identified study areas that were divided into a number of project specific historical archaeological management units (HAMU's) which incorporate both the on and off-corridor works.

The key reference documents are:

- Parramatta Light Rail; Non-Aboriginal Archaeological Assessment. Report to WSP/Jacobs on behalf of TfNSW (Artefact 2017a)
- Parramatta Light Rail; Built Heritage Impact Assessment. Report to WSP/Jacobs on behalf of TfNSW (Artefact 2017b)
- Parramatta Light Rail Aboriginal Cultural Heritage Assessment (KNC 2017)

HAMU's were developed based on land-use history, historic plans, pre-existing studies and previous archaeological investigations in the vicinity of the study area.

Following identification of units an assessment of archaeological significance was undertaken and each unit was assigned a zone outlining appropriate recommendations and mitigation of impacts. Zone 1 represents state significant archaeology, zone 2 represents locally significant archaeology, and zone 3 is unlikely to contain significant archaeology.

Relevant HAMUs for these works are HAMU1, HAMU2 and HAMU 37 as identified on Map 5-2. HAMU 1 and HAMU 2 cover the works area on Hawkesbury Road. They have potential to contain heritage items of local significance. HAMU37 covers the stockpile location on Mons Road. It has nil-low archaeological potential. Descriptions of these areas and specific management measures are detailed in the ARD (Section 2.3.3 of the ARD).

HAMU 37 is not in the key reference documents. It was identified for due diligence purposes that identified a new project area. No excavation is anticipated to occur in this area. HAMU 37 is identified as zone 3 in the ARD (Section 2.3.3 of the ARD).

### 5.1.2 Aboriginal heritage

There is no identified Aboriginal heritage objects or places within or adjacent to the project footprint.

### 5.1.3 Built heritage

HRW considered potential heritage impacts during design. The Environmental Design Report identified that the nearest known heritage item is the Westmead University Campus (120m west, refer to Section 5.3.2).

### 5.1.4 Heritage items summary

Table 5-1 lists the heritage places, buildings, works, relics, movable objects, management units, and precincts located within or next to the project footprint. Figure 5-1 shows each item's location in the context of the Project. Figure 5-2 shows the location of HAMU areas. There were no conservation areas or known Aboriginal items located within the project vicinity. In addition, HAMU

1 and 2 were identified in the EIS as potential for local significance and any potential impact to this archaeological heritage would be management by the ARD as required in E72/E73

Table 5-1: Heritage items

Name	Location	Significance
University of Western Sydney (CoPC Local Environmental Plan, I628)	[REDACTED]	Local
Victorian residence (in grounds of University of Western Sydney) (CoPC Local Environmental Plan, I628)	[REDACTED]	Local
HAMU 1	Eastern side of Hawkesbury Road including the road corridor	Local
HAMU 2	Western side of Hawkesbury Road including the road corridor	Local
HAMU 37	Mons Road Stockpile	Local

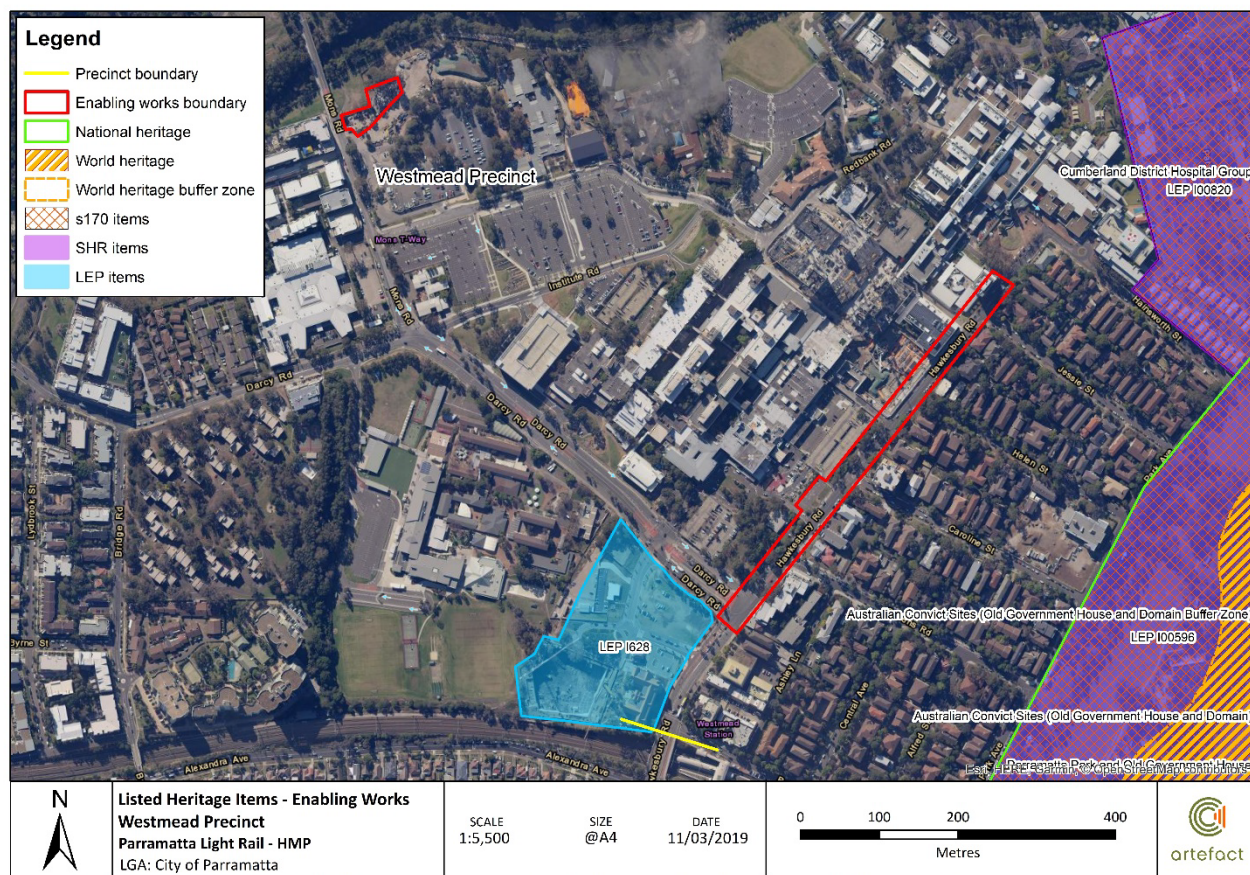


Figure 5-1: Location of heritage items



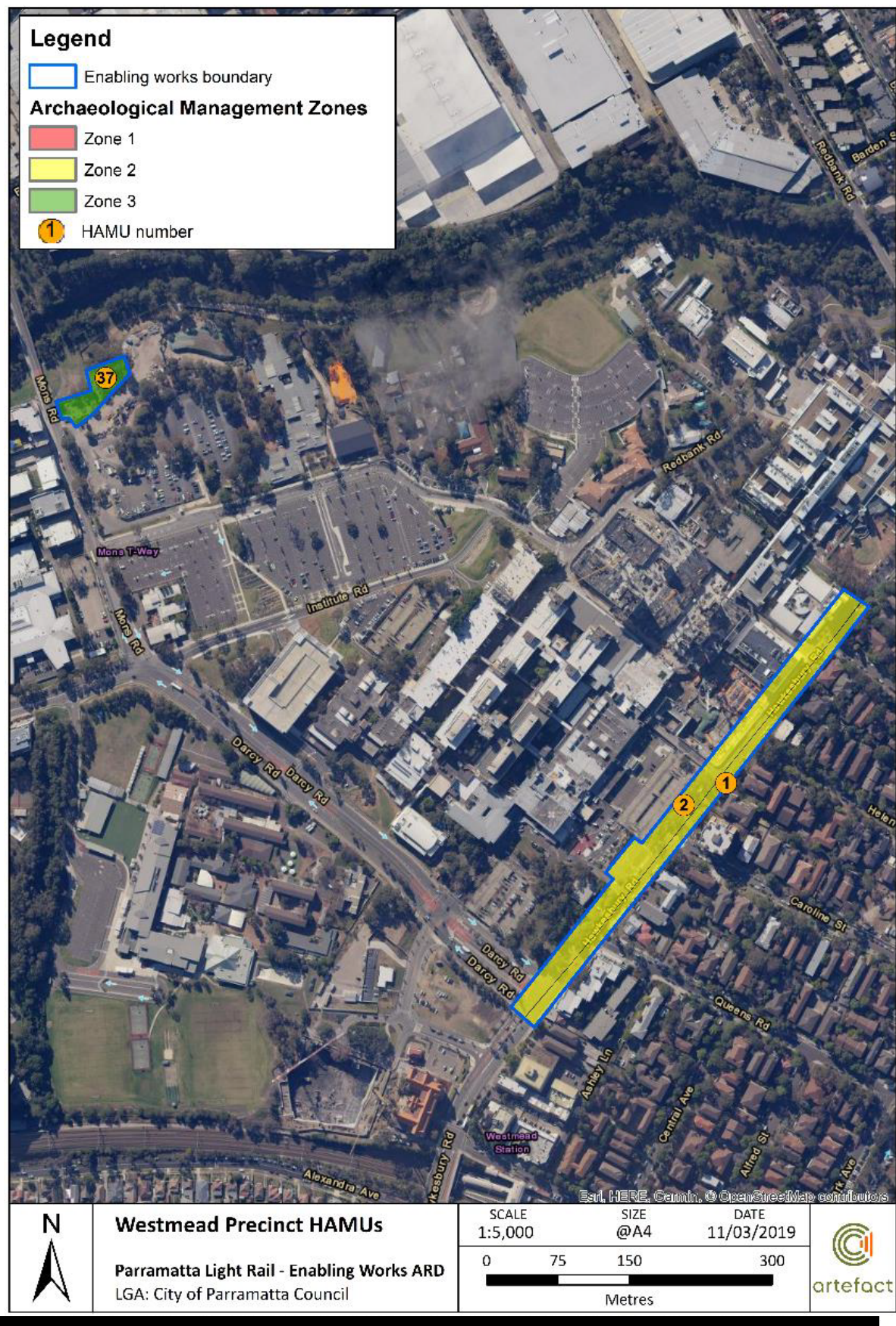


Figure 5-2: Historical Archaeological Management Zones (HAMU) within construction zone

## **Former Reserved Cemetery Area**

The west construction boundary intersects an area formerly reserved on Government plans for a cemetery (Figure 5-3) but the cemetery was not consecrated. The ARD (PLR-HAC-HRW-PE-PLN-000008) discusses this in detail in Section 2.2.3. This area was not identified in the EIS to have potential for human remains. Management measure HER3 (refer to Section 7) will apply to this area to manage potential impacts.

Archaeological investigations would be managed by a suitably qualified Primary Excavation Director with experience in the historical archaeology of Parramatta. For sites with potential for State significant archaeology the Primary Excavation Director should meet the NSW Heritage Council criteria for State significant archaeological sites.

The Excavation Director would oversee archaeological works. In accordance with E74 the Excavation Director would attend site where required to appropriately manage archaeological works. The Excavation Director would have the authority to advise on the duration and extent of oversight required during excavation.

The EIS identifies sections of the PLR that have the potential for human remains. Note all these areas identified as having potential for human remains are outside the enabling works boundary. An Exhumation Management Plan is required for these identified areas of potential for human remains, however is not required for works relating to the Project.



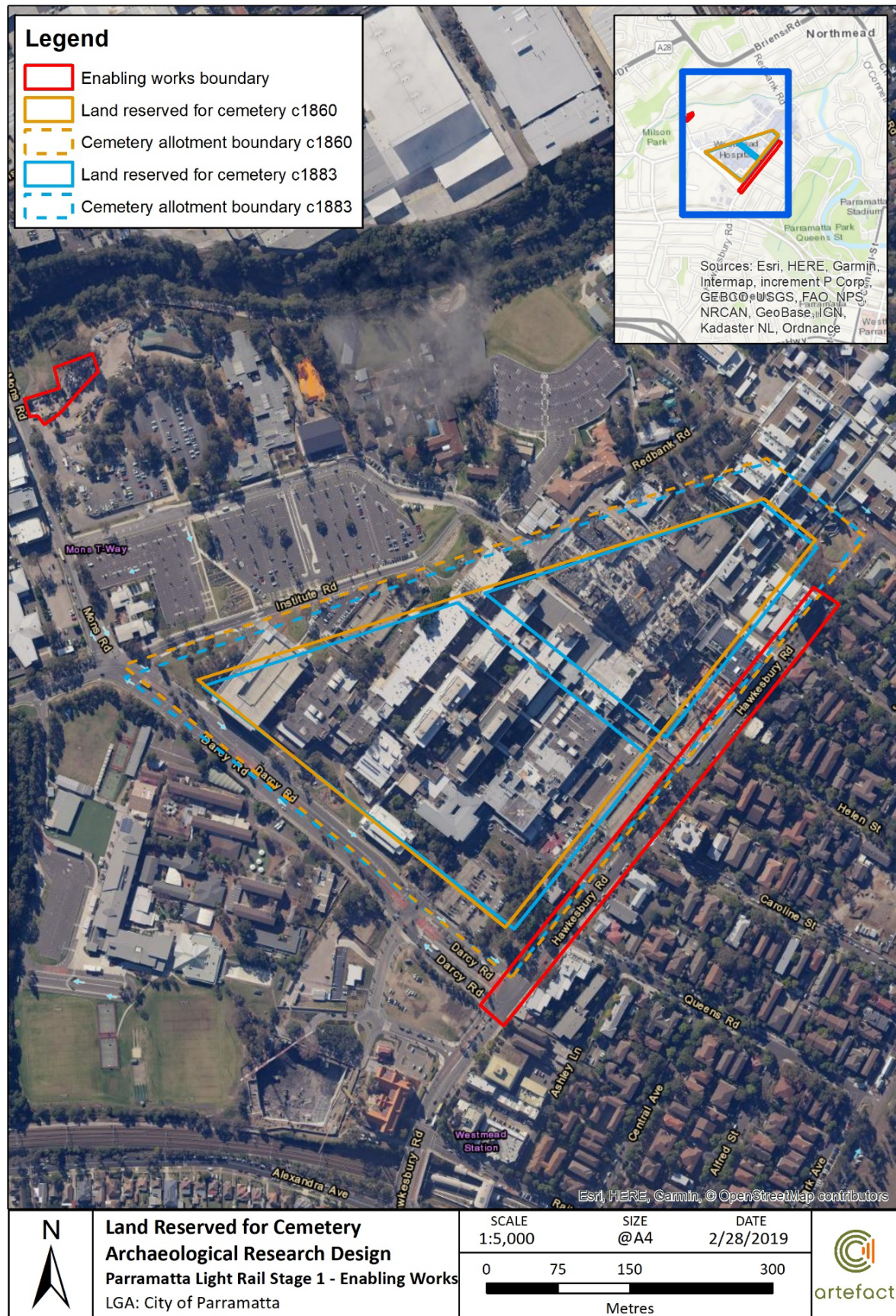


Figure 5-3: Former reserved cemetery area alongside Hawkesbury Road

## **University of Western Sydney (LEP I628)**

The location of the heritage listed structures are shown in Figure 5-1 as area LEP I628. The multi-storeyed brick building has prominent gables at the front and stone facings. It was constructed between 1899-1938. It has rendered brick walls with ashlar markings and Marseille tiled roof. The steep gabled roof has three breakfronts across the front elevation with brick buttresses at each end and parapeted gables mounted by a cross. A sandstone stringline is located above the ground floor and the window openings. The building has two narrow towers with shingled candle-snuffer roofs mounted by decorative cast iron finials. The veranda has a steep pitched roof that has now been reduced and a floor added.

The buildings are located 120m away from the nearest construction works. The nearest works to the buildings are on the corner of Hawkesbury Road and Darcy Road. The works will include saw-cutting, road demolition and trench excavation for relocation of Telstra Conduits. Impacts from the proposed pre-construction minor works have been identified in the "Parramatta Light Rail – Built Heritage Impact Assessment" as negligible. Vibration levels are anticipated to be under the cosmetic damage screening levels and therefore no specific management measures have been recommended to be put in place in relation to this heritage building. Vibrational impacts are detailed in Appendix C1.6 of the Noise and Vibration Management Plan (PLR-HAC-HRW-NV-PLN-000001).

## **5.2 Activity B: Cumberland Hospital (East Campus) Demolition**

### **5.2.1 Historical Archaeological Management Units**

The relevant HAMU for these works is HAMU 4 as identified on Figure 5-4. HAMU 4 was assessed as Zone 1 - having potential to contain State and locally significant archaeological remains.



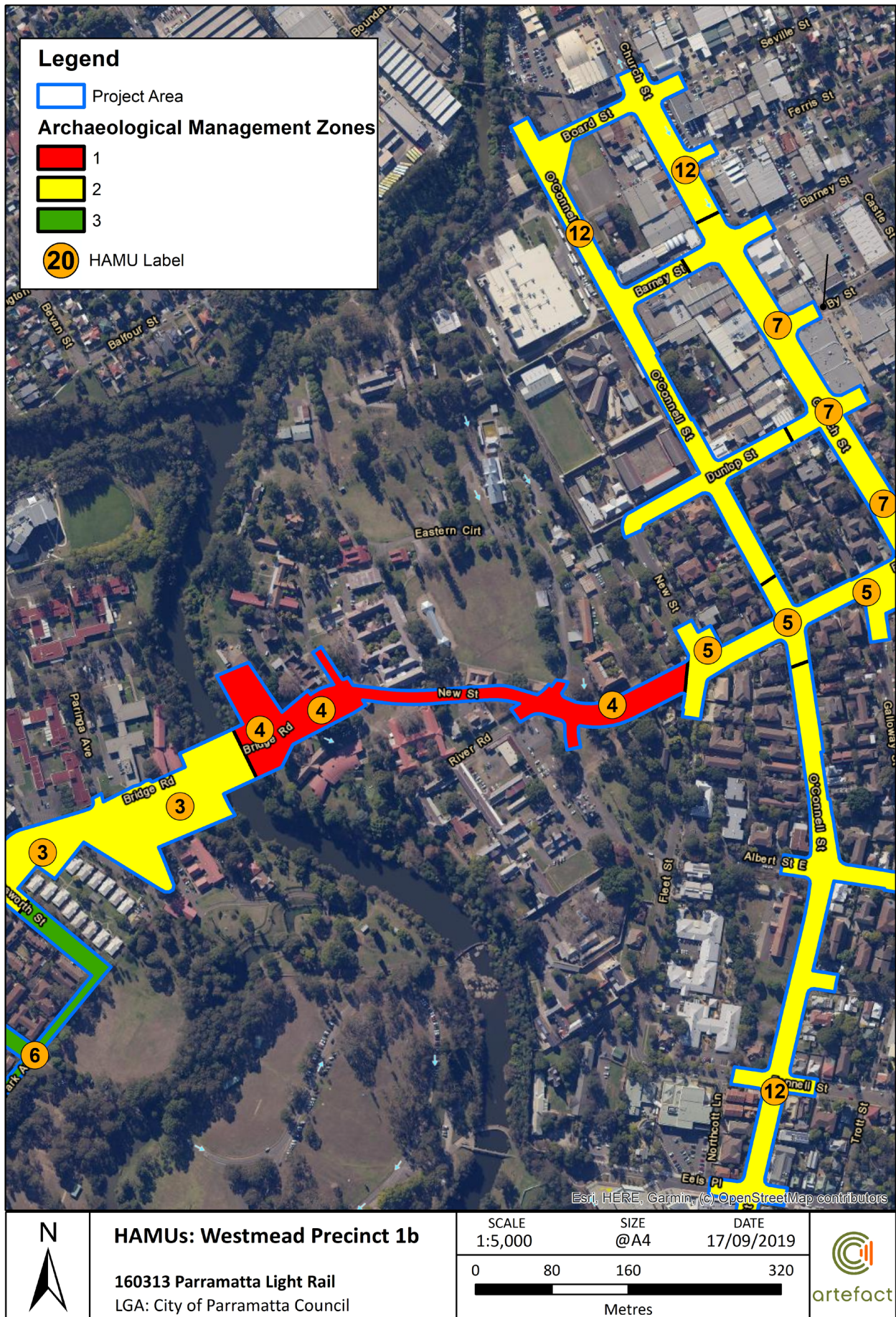


Figure 5-4: Westmead Precinct HAMUs



In 2016-2017 Casey & Lowe Archaeology & Heritage completed a program of archaeological testing within the Cumberland Hospital to inform the development of the Parramatta North Growth Centre (PNGC).<sup>2</sup> The program focused on areas of potential state significant archaeological remains, including locations in the vicinity of the enabling works study area (refer to Figure 5-5), which were referenced as test areas 21 (Mrs Betts' House) and 22 (Charles Smiths' farm). Test trench 22/3 was excavated in approximately the same area as proposed enabling works. Relevant testing results have been included in the following sections.



Figure 5-5: Locations of test trenches in the vicinity of the Cumberland East enabling works study area, undertaken by Casey & Lowe in 2017-2018. Source: Casey & Lowe November 2018

### Test Area 21<sup>3</sup>

Test area 21 (TA21) was excavated approximately 80m to the south and east of the enabling works locations. The trench excavated in this location identified substantial remains associated with the Betts/Blaxland house, including footings and later flooring associated with the hospital. Internal walls, fireplace footings and a later demolition deposit were also identified.

### Test Area 22<sup>4</sup>

Test area 22 (TA22), test trench 3, was located in the immediate vicinity of proposed enabling works. Area 22 test trenches 1 and 2 were excavated appreciatively 70m to the south and east of the enabling works locations.

The trenches were designed to determine whether evidence of Charles Smith's use of the land was had survived. Historical research undertaken by Casey & Lowe suggests that Smith may have

<sup>2</sup> Casey & Lowe Historical Archaeology Testing Report Parramatta North Growth Centre report to UrbanGrowth NSW Development Corporation, November 2018

<sup>3</sup> Casey & Lowe, November 2018 p. 282

<sup>4</sup> Casey & Lowe Historical Archaeology Testing Report Parramatta North Growth Centre report to UrbanGrowth NSW Development Corporation, November 2018 p. 283

constructed a residence on his property, and TA22 was located within a rise in the landscape, close to a surveyor's mark believed to represent the house.<sup>5</sup>

Overall, no evidence of Smith's farm was identified during the testing program, although the trenches did contain evidence of later use of the land, including agricultural furrows (TA22/3) and remains of a surfaced carriageway / path and drains (TA22/1 and T122/2).

The Cumberland East enabling works require minimal excavation impacts. In-ground impacts are also focused in areas previously impacted by utility installation.

While the methodology for utility capping has not yet been confirmed, four locations have been identified as potentially requiring in-ground works (see Figure 5-6). These locations would be subject to capping of existing gas main locations. Excavation dimensions in each location marked on Figure 5-6 is expected to measure 1000mm x 1000mm and extend to an approximate depth of 800mm. This is a worst-case assumption and it is possible excavation may not be required.



Figure 5-6: Approximate location of in-ground enabling works

### Archaeological resource

On analysis of the testing results obtained by Casey & Lowe, in conjunction with archaeological assessment produced for the EIS and analysis of existing utilities corridors, this ARD has made the following conclusions regarding the archaeological potential of the Cumberland East enabling works study areas:

- Nil- low potential to contain remains associated with Charles Smith's farm and residence (state significant)

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<sup>5</sup> Casey & Lowe November 2018



- Low potential to contain remains associated with the Mrs Betts' house and outbuildings (state significant)
- Low potential to contain outbuildings associated with the Lunatic Asylum/The Superintendent's Office (local significance)
- Moderate potential to contain evidence of former carriageway/path infrastructure and utilities (nil - local significance).

Archaeological management would be required in accordance with the Archaeological Research Design for the project which would include nomination of an Excavation Director and archaeological monitoring (HER1 and HER3).

In accordance with E74 the Excavation Director will attend an initial induction prior to any excavation works occurring. The duration of Excavation Director oversight of excavation is dependent on construction methodology and archaeological finds, therefore the Excavation Director would communicate with the site manager to confirm attendance based on schedule and would inform the site manager of any additional oversight needed if archaeology was found. The Excavation Director would only be required in areas that have been assessed as having potential for significant archaeological remains.

### **Buildings archaeology**

The Archaeological Management Strategy for the Cumberland Hospital East Precinct addressed buildings archaeology which refers to archaeological remains that are not buried, but found within extent structures. "Any works that involve the removal of building fabric that may expose previously hidden voids or cavities may disturb concealed objects. This is particularly relevant where earlier timber floors, ceilings or walls are known to have existed, despite refurbishment and modification"<sup>6</sup>. Building 52 is identified as having low-moderate potential for locally significant buildings archaeology which may be uncovered during salvage or demolition. The methodology of the Archaeological Management Strategy would then be followed as per HER11.

### **5.2.2 Aboriginal heritage**

There are no known Aboriginal heritage objects or places identified within or adjacent to the project footprint. Aboriginal site AHIMS #45-6-3195 is adjacent to the site compound to the west of building 52. The Aboriginal site will not be impacted as it will be protected by an exclusion zone and barrier fencing/signage.

If an unexpected find is made the TfNSW Unexpected Heritage Finds Guideline in Appendix A will be implemented.

It is noted that a recent archaeological testing program undertaken by Comber Consultants for the Parramatta Growth Centre project identified portions of the enabling works project area as having archaeological potential that were not identified by KNC as sensitive in the PLR CHAR. Comber notes that much of the site is covered by around one metre of fill which would not have archaeological potential. Comber also notes the cultural significance of the area to Aboriginal people. As the excavation proposed for the Cumberland East site are less than one meter in depth it is unlikely that Aboriginal archaeological deposits would be encountered. If Aboriginal objects were identified during archaeological monitoring for non-Aboriginal archaeology for the gas main capping, the Unexpected Finds Procedure would be implemented.

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<sup>6</sup> Casey and Lowe Parramatta North Growth Centre Parramatta North Archaeological Management Strategy Archaeological Research Framework July 2019, page 56

### 5.2.3 Built heritage

Impacts within the Cumberland District Hospital Group SHR curtilage will be limited to the following buildings which will be demolished down to slab:

- Building 52 (convalescent ward/south wing) – moderate significance
- Building 67 (Palm House) – little significance
- Building 71 (Recreation Department Store) – little significance
- Building 72 (Bridgeway Centre) – little significance
- Building 73 (ECAV Training Centre). – little significance

The EIS assessment also identified the CHIP Hostel No. 1 within the Cumberland Hospital (East) campus as potentially requiring demolition. Changes have been made during detailed design which means that this building will no longer be impacted by activity B or package 2.

Note that the EIS assessment and this Plan use existing historical information and significance assessments contained in the most recent Conservation Management Plan (CMP) for the site, the 'Parramatta North Historic Sites: Consolidated Conservation Management Plan – Part B Cumberland Hospital (East Campus) Site, Heritage Significance Assessment' (Tanner Kibble Denton Architects, March 2017) (CMP 2017).

As building 52 (southern wing) abuts the adjacent 1909 central wing which is of high heritage significance, care would be taken during dismantling of the fabric immediately adjacent to the retained wall. A demolition and make-good methodology is currently in preparation by The Contractor and would be reviewed by a heritage specialist and Heritage DPC prior to demolition.

Stone kerbing, which is identified as of heritage significance, is located within the proximity of the works however this would not be impacted (Figure 5-7). Impacts to the kerbing would be avoided by implementing the relevant management measures.



Figure 5-7: Stone kerbing approximate location shown in red

## 5.2.4 Heritage items summary

Table 5-2 lists the heritage places, buildings, works, relics, movable objects, management units, and precincts located within or next to the project footprint. Figure 5-4 shows the location of HAMU areas.

Activity B is within the SHR listed Cumberland Hospital site. There were no conservation areas or known Aboriginal items located within the project vicinity. In addition, HAMU 4 was identified in the EIS as potential for State/locally significant archaeology, and any potential impacts would be management by the ARD as required in E72/E73.

All significant elements of the SHR item not approved for impact are shown as no-go zones on the Environmental Control Maps (ECM), Appendix A7 of the CEMP.

Table 5-2: Heritage items

Name	Location	Significance
Cumberland District Hospital Group - SHR 00820; NSW Department of Health s170 Heritage and Conservation Register; Parramatta LEP I00820	Cumberland District Hospital Group	State
HAMU 4	Cumberland District Hospital Group	State

## 5.3 Activity C: Cumberland Hospital (West Campus) Demolition

### 5.3.1 Historical Archaeological Management Units

The relevant HAMU for these works is HAMU3 as identified on Figure 5-4. HAMU 3 was assessed as Zone 2 - having potential to contain archaeological remains of local significance associated with early subdivision and agricultural use. Remains are likely to be ephemeral.

### 5.3.2 Aboriginal heritage

There are no identified Aboriginal heritage objects or places within or adjacent to the project footprint.

### 5.3.3 Built heritage

The enabling works are within the SHR listed Cumberland Hospital Group. The project would include removal and relocation of five recovery cottages and the Boronia Ward.

The recovery cottages are contemporary one-storey brick residences used for long-term accommodation by hospital patients. The Boronia Ward is a contemporary brick building used as a non-acute rehabilitation unit. The buildings are contemporary and have little significance.

The surrounding buildings on the Cumberland West Campus are also contemporary and have little heritage significance however they lie within the SHR listed Cumberland Hospital Group.

### 5.3.1 Heritage items summary

Table 5-3 lists the heritage places, buildings, works, relics, movable objects, management units, and precincts located within or next to the project footprint. Figure 5-4 shows the location of HAMU areas.

The project would include removal and relocation of five recovery cottages and the Boronia Ward. The buildings are contemporary and have little significance.

There were no conservation areas or known Aboriginal items located within the project vicinity. In addition, HAMU 3 identified in the EIS as having the potential for locally significant archaeology although as no subsurface impacts are proposed there would be no archaeological impacts and Excavation Director oversight would not be required.

Table 5-3: Heritage items

Name	Location	Significance
Cumberland District Hospital Group- SHR 00820; NSW Department of Health s170 Heritage and Conservation Register; Parramatta LEP I00820	Cumberland District Hospital Group	State
HAMU 3	Cumberland District Hospital Group	Local



## 6 Environmental aspects and impacts

This section describes what construction activities have the potential to impact heritage and what known Aboriginal and non-Aboriginal heritage items may be impacted through these activities.

### 6.1 Activity A: Hawkesbury Road Widening

#### 6.1.1 Construction activities

Key aspects of the Project that could result in an adverse heritage impact include:

- Pre-construction works, including non-substantial construction activities such as services relocations
- Excavation works
- Initial vegetation clearing and/or grubbing
- Initial topsoil removal
- Temporary access roads during construction.

#### 6.1.2 Aboriginal heritage impacts

There is no known Aboriginal heritage objects or places identified within or adjacent to the project footprint therefore no identified actual or potential impacts.

If an unexpected find is made the TfNSW Unexpected Heritage Finds Guideline in Appendix A will be implemented.

#### 6.1.3 Non-Aboriginal Heritage impacts

The Project must be carried out in compliance with the follow conditions:

- CoA E60 states that the Proponent (and Contractor) must not modify or otherwise physically affect heritage items (including Aboriginal objects), outside of the CSSI footprint.
- CoA E61 states that nothing in this approval permits the Proponent (and Contractor) to harm, modify, or otherwise impact human remains uncovered during the construction and operation of the CSSI
- CoA E65 and REMMM AB-2 state that identified impacts on heritage items, and heritage conservation areas, must be minimised through both detailed design and construction in consultation with the Heritage Council (or its delegate). The measures to manage this must be detailed in the Heritage Management Sub-plan required by Condition C3.

Table 6-1 summarises identified impacts and management measures in relation to non-Aboriginal heritage.

Table 6-1: Heritage: impacts and mitigation

Name	Impact	Management
University of Western Sydney (I628)	No Impact: <i>Trucks passing while travelling between site and storage facilities. No greater impact than standard traffic.</i>	NA
Victorian residence (in grounds of University of Western Sydney) (I628)	No Impact: <i>Trucks passing while travelling between site and storage facilities. No greater impact than standard traffic.</i>	Site protected by fencing identifying area and preventing access.  This is identified on the environmental control maps.
HAMU 1	Direct Impact: <i>Excavations occurring within area. Potential disturbance historical archaeology.</i>	ARD
HAMU 2	Direct Impact: <i>Excavations occurring within area. Potential disturbance historical archaeology.</i>	ARD
HAMU 37	No Impact: <i>Materials being stored on site, large vehicles utilising site but no subsurface impacts expected</i>	NA
Unexpected finds	Unknown	TfNSW Unexpected Heritage Finds Guideline Appendix A

## 6.2 Activity B: Cumberland Hospital (East Campus) Demolition

### 6.2.1 Construction activities

Key aspects of the Project that could result in an adverse heritage impact include:

- Demolition of five structures down to slab
- Capping of gas mains with excavation expected to be localised and 800mm deep (as a worst-case assumption).

Prior to the commencement of the main construction program, a program of enabling works are required. For the Cumberland East enabling works study area these works would be primarily associated with the demolition of six buildings to ground level. In-ground impacts would be minimal and involve the disconnection of utility services from the buildings to be demolished (Figure 5-6).

### 6.2.2 Aboriginal heritage impacts

There are no known Aboriginal heritage objects or places identified within the project footprint. Aboriginal site AHIMS #45-6-3195 is adjacent to the site compound to the west of building 52. The

Aboriginal site will not be impacted as it will be protected by an exclusion zone and barrier fencing/signage.

If an unexpected find is made the TfNSW Unexpected Heritage Finds Guideline in Appendix A will be implemented.

### 6.2.3 Non-Aboriginal Heritage impacts

The Project must be carried out in compliance with the follow conditions:

- CoA E60 states that the Proponent (and Contractor) must not modify or otherwise physically affect heritage items (including Aboriginal objects), outside of the CSSI footprint.
- CoA E61 states that nothing in this approval permits the Proponent (and Contractor) to harm, modify, or otherwise impact human remains uncovered during the construction and operation of the CSSI
- CoA E65 and REMMM AB-2 state that identified impacts on heritage items, and heritage conservation areas, must be minimised through both detailed design and construction in consultation with the Heritage Council (or its delegate). The measures to manage this must be detailed in the Heritage Management Sub-plan required by Condition C3.

Table 6-2 summarises identified impacts and management measures in relation to non-Aboriginal heritage. No vibration intensive plant will be used to demolish buildings as part of Activity B and therefore the potential for vibration impacts at surrounding buildings is low. In relation to the southern wing of building 52, there will be make good refurbishment for the remnant portion of building 52 due to the removal of part of the building. These works shall remedy any minor cosmetic damage if caused by the demolition works.

Inspection/dilapidation survey of building 52 will be carried out however this is not driven by the potential for vibration impacts, neither due to the heritage listing nor comfort and cosmetic levels.

Once the nature of excavation for the gas capping (if any) are known a work method statement (WMS) will be prepared in accordance with the ARD which will assess impacts to potential archaeology and outline required management in accordance with the ARD. The WMS will be provided to TfNSW.

Table 6-2: Heritage: impacts and mitigation

Name	Impact	Management
Cumberland District Hospital Group- SHR 00820; NSW Department of Health s170 Heritage and Conservation Register; Parramatta LEP I00820 Cumberland Hospital Present State	Direct Impact: <i>Four buildings of little significance and one building of moderate significance to be demolished down to slab (no demolition or excavation would occur under slab)</i>	Archival recording Salvage strategy and moveable heritage strategy Demolition and make good methodology Archaeological management of 'buildings archaeology'
HAMU 4	Direct Impact: <i>Minor excavations for gas main capping occurring within area. Potential disturbance historical archaeology.</i>	ARD and WMS
Unexpected finds	Unknown	TfNSW Unexpected Heritage Finds Guideline Appendix A

## 6.3 Activity C: Cumberland Hospital (West Campus) Demolition

### 6.3.1 Construction activities

Key aspects of the Project that could result in an adverse heritage impact include:

- Demolition of six structures down to slab

### 6.3.2 Aboriginal heritage impacts

There are no known Aboriginal heritage objects or places identified within or adjacent to the project footprint therefore no identified impacts.

If an unexpected find is made the TfNSW Unexpected Heritage Finds Guideline in Appendix A will be implemented.

### 6.3.3 Non-Aboriginal Heritage impacts

The Project must be carried out in compliance with the follow conditions:

- CoA E60 states that the Proponent (and Contractor) must not modify or otherwise physically affect heritage items (including Aboriginal objects), outside of the CSSI footprint.
- CoA E61 states that nothing in this approval permits the Proponent (and Contractor) to harm, modify, or otherwise impact human remains uncovered during the construction and operation of the CSSI
- CoA E65 and REMMM AB-2 state that identified impacts on heritage items, and heritage conservation areas, must be minimised through both detailed design and construction in consultation with the Heritage Council (or its delegate). The measures to manage this must be detailed in the Heritage Management Sub-plan required by Condition C3.

Table 6-3 summarises identified impacts and management measures in relation to non-Aboriginal heritage. No vibration intensive plant will be used to demolish buildings as part of Activity C and therefore the potential for vibration impacts at surrounding buildings, which have been identified as being of little heritage significance, is low.

Table 6-3: Heritage: impacts and mitigation

Name	Impact	Management
Cumberland District Hospital Group- SHR 00820; NSW Department of Health s170 Heritage and Conservation Register; Parramatta LEP I00820 Cumberland Hospital Present State	Direct Impact: <i>Boronia Ward and five recovery cottages to be demolished. All buildings are of little heritage significance</i>	Archival recording
HAMU 3	No Impact: <i>No subsurface impacts, demolition is down to slab (no demolition or excavation would occur under slab)</i>	n/a

Name	Impact	Management
Unexpected finds	Unknown	TfNSW Unexpected Heritage Finds Guideline Appendix A

## 7 Management measures

This section describes the specific measures and requirements to address contract specification, CoA and REMMMs in relation to Aboriginal and non-Aboriginal heritage. Table 7-1 describes these measures.

Table 7-1: Heritage management measures

ID	Management Action	Trigger/Timing	Responsibility	Description of Management Action	Relevant REMM/CoA or document	Activity A	Activity B	Activity C
<b>GENERAL ABORIGINAL AND NON-ABORIGINAL HERITAGE MANAGEMENT MEASURES</b>								
H1	Implementation of CHMP	Construction	Environmental Manager	Section 6.1, 6.2 and 6.3 outlines the construction activities covered by this Plan	<b>CoA:</b> C3(d) <b>REMM:</b> AB-2, HE-21	✓	✓	✓
H2	No Aboriginal or Non-Aboriginal heritage items outside the Project footprint or uncovered during construction may be destroyed or otherwise physically affected.	Construction	The Contractors Associates and Subcontractors	There are no known Aboriginal sites within the project area (Section 5). Aboriginal site AHIMS # 45-6-3195 is adjacent to the site compound of Activity B. Exclusion zones shall be provided to protect the nearby identified Aboriginal site AHIMS 45-6-3195 as per AB-4.  The Unexpected Heritage Finds Guideline (TfNSW, 2015) shall be applicable.  Where works is required outside the project area, a consistency assessment must be prepared which would assess any potential heritage impacts.	<b>CoA:</b> E60, E76 <b>REMM:</b> AB-2	✓	✓	✓
H3	Unexpected finds would generally be managed under the Unexpected Heritage Finds Guideline (TfNSW, 2015) (Appendix A)	Pre-Construction	The Contractors Associates and Subcontractors	Although the Unexpected Heritage Finds Guideline (TfNSW, 2015) includes human remains as an example of an unexpected find it does not specify the required procedure for reporting the find. The procedure for human remains is included in Appendix A.	<b>CoA:</b> E61, E62, E63, E77 <b>REMM:</b> AB-2	✓	✓	✓
H4	Review and revision of this plan if new works are proposed	Construction	Environmental Manager	Any new, approved, works will need capturing by revising this Plan to assess any potential impact and set out any additional management measures  New areas have to be assessed in terms of the impact of construction activities that could result in an adverse heritage impact  Any future revision of this Plan relating to changes in management measures or impacts must be referred to the Heritage DPC for review	Good practice	✓	✓	✓
H5	Heritage inductions	Pre-construction	Project Manager	All personnel including sub-contractors working on site will undergo induction training relating to heritage management issues before starting work. Heritage concerns will be raised and discussed at regular toolbox-talks.	Good practice	✓	✓	✓

ID	Management Action	Trigger/Timing	Responsibility	Description of Management Action	Relevant REMM/CoA or document	Activity A	Activity B	Activity C
	<b>SITE SPECIFIC ABORIGINAL HERITAGE MANAGEMENT MEASURES</b>							
A1	Any Aboriginal objects discovered will be identified in a heritage interpretation strategy.	If Aboriginal objects are uncovered	Environmental Manager	<p>No Aboriginal sites or areas of Aboriginal archaeological potential are located within the project area.</p> <p>If any Aboriginal objects are discovered they will be added to the Package 4 and SOM heritage interpretation strategy.</p> <p>The strategy will be updated within 6 months to update the additional finds.</p>	CoA: E64a	✓	✓	No excavation
	<b>SITE SPECIFIC NON – ABORIGINAL HERITAGE MANAGEMENT MEASURES</b>							
HER1	Historical Archaeological Research Design and Excavation Methodology (ARD) preparation and consultation	Pre-construction	Environmental Manager	<p>An ARD will be prepared by a suitably qualified archaeologist before works begin within a Historical Archaeological Management Unit</p> <p>The ARD will be submitted to the Heritage Council of NSW (or its delegate) for review and comment before finalisation.</p>	REMM: E72, E73	✓	✓	No excavation
HER2	Notification of a relic	Pre-construction Construction	Environmental Manager	If relics are identified Heritage DPC as a delegate of the NSW Heritage Council must be notified in accordance with s146 of the NSW Heritage Act, which is not switched off by the CSSI approval.	CoA: E73 s146 of the NSW Heritage Act	✓	✓	No excavation
HER3	Excavation Director involvement	Construction, specifically excavation	Environmental Manager	<p>The Excavation Director shall oversee archaeological works including potential archaeological sites such as the former reserved cemetery area. In accordance with E74 the Excavation Director would attend site where required to appropriately manage archaeological works. The Excavation Director would have the authority to advise on the duration and extent of oversight required during excavation.</p> <p>The Excavation Director has the authority to advise on the duration and extent of oversight required.</p> <p>Where the unexpected heritage finds guideline is triggered in any Zone or outside the project area the Excavation Director must oversee its implementation during excavation.</p>	CoA: E74 REMM: HE-21	✓	✓	No excavation



ID	Management Action	Trigger/Timing	Responsibility	Description of Management Action	Relevant REMM/CoA or document	Activity A	Activity B	Activity C
HER4	Archaeological excavation report preparation and submission	If archaeological relics are discovered.	Environmental Manager	<p>In the event that archaeological relics are discovered, an Archaeological Excavation Report will be prepared containing the findings of any excavations, including artefact analysis and the identification of a final repository of any relics.</p> <p>The report will be submitted to the Secretary, for information, within 12 months of completing all archaeological investigations, unless otherwise agreed with the Secretary.</p> <p>The Archaeological Excavation Report will also be submitted to the NSW Heritage Council, the local library and the local Historical Society in CoPC. A copy of the Archaeological Excavation Report will be provided with the relics.</p>	CoA: E75	✓	✓	No excavation
HER5	Salvage strategy for significant fabric	Pre-construction	Environmental Manager	<p>A salvage strategy will be prepared in accordance with the requirements for E70 for significant fabric to be impacted within or adjacent to demolished structures for Activity B. Structures demolished as part of Activity C are contemporary and do not require salvage.</p> <p>A process for nominating a suitable repository location(s) including required consultation with Council and Heritage DPC would be established in the report. A process for managing residual items and materials will also be included in the report.</p> <p>Following salvage the material will be tested and if found to be contaminated would be disposed of appropriately. If the salvage material is appropriate for reuse a recommendation would be made by the heritage consultant as to what elements (if any) would be appropriate for interpretation in accordance with the Package 4 Heritage Interpretation Strategy. The Package 4 Contractor would be given the option to take on the material which would be done prior to Package 4 early works being completed.</p> <p>Where the material is not accepted for the purpose of interpretation, the fabric will be divested in the following diminishing priorities:</p> <ul style="list-style-type: none"> <li>Offered to asset managers within the Cumberland Hospital Group for the purpose of heritage restoration of similar heritage fabric.</li> <li>Offered to other heritage restoration projects requiring similar heritage fabric.</li> <li>Offered to a heritage salvage yard.</li> </ul>	CoA: E70, E71 REMM: HE-15	X	✓	X



ID	Management Action	Trigger/Timing	Responsibility	Description of Management Action	Relevant REMM/CoA or document	Activity A	Activity B	Activity C
HER6	Moveable heritage strategy	Pre-construction	Environmental Manager	A moveable heritage strategy shall be prepared in accordance with the requirements for E70 for significant moveable items as identified during the archival recording for Activity B, to be impacted within or adjacent to demolished structures. Structures demolished as part of Activity C are contemporary and would contain significant moveable heritage.	REMM: HE-13	X	✓	X
HER6	Photographic Archival recording	Pre-construction	Environmental Manager	An archival recording report shall be prepared in accordance with the requirements for E70 for Activities B and C within the SHR listed Cumberland Hospital Group.	CoA: E70, E71 REMM: HE-14	X	✓	✓
HER7	Management of demolition of building 52 Cumberland East	Pre-construction	Environmental Manager	An appropriately qualified and experienced heritage consultant will review the demolition and make good methodologies for the southern wing of building 52 to ensure that impacts to significant fabric were avoided and any make good was appropriately conducted. The demolition and make good methodologies must also be reviewed by Heritage DPC.	Heritage DPC consultation CoA: E66	X	✓	X
HER8	Consultation with Heritage DPC for impacts to Cumberland District Hospital Group	During construction	Environmental Manager	In accordance with E65 consultation with Heritage DPC as a delegate of the Heritage Council must be undertaken where identified impacts to heritage items and heritage conservation areas are to occur to demonstrate impacts have been minimised during detailed design and construction. Heritage DPC has been consulted during the preparation of this plan (Appendix B).  Should further assessment be required if an unexpected find requires a change to detailed design.	CoA: E65	X	✓	✓
HER9	Compound site location	During construction	Environmental Manager	In accordance with VL-17 the extent of compound sites within the Cumberland East Precinct must be minimised and location chosen in order to reduce visual impacts to the heritage item.  The extent of the site compound for Activity B has been optimised to minimise impacts on the Cumberland Hospital East Aboriginal site. Other compound sites are not within areas for heritage sensitivity.  Site compounds must be installed as per the Environmental Control Maps and Section 4.6 of the CEMP.	REMM VL-17	X	✓	✓

ID	Management Action	Trigger/Timing	Responsibility	Description of Management Action	Relevant REMM/CoA or document	Activity A	Activity B	Activity C
HER10	Archaeologist advice in regard to 'buildings archaeology'	During construction	Environmental Manager	As building 52 has a low-moderate potential for buildings archaeology, an archaeologist must inspect the structure once vacant and before demolition and recommend whether further management was required in accordance with the <i>Parramatta North Growth Centre Parramatta North Archaeological Management Strategy Archaeological Research Framework</i> <sup>7</sup> Section 8.3 discusses this process.	Casey and Lowe Parramatta North Growth Centre Parramatta North Archaeological Management Strategy Archaeological Research Framework July 2019, page 56	X	✓	X
HER11	Protection of stone kerbing	During construction	Environmental Manager	Stone kerbing would not be impacted by the works and would be protected by a physical barrier where construction works are undertaken in the vicinity, as shown in the Environmental Control Maps. The stone kerbing adjacent to Building 67 would be protected by fencing and signage during works to Building 67.	Heritage DPC consultation <b>CoA:</b> E66	X	✓	X
HER12	Hoarding	During construction	Environmental Manager	Hoarding would be installed around the site compound and construction work areas where practical to minimise visual impact during demolition works.	<b>CoA:</b> C4 (b)	X	✓	✓

<sup>7</sup> Casey and Lowe *Parramatta North Growth Centre Parramatta North Archaeological Management Strategy Archaeological Research Framework* July 2019, page 56

# 8 Compliance management

This section describes how compliance will be achieved and the responsible parties for all requirements.

## 8.1 Roles and responsibilities

The Contractor's organisational structure and overall roles and responsibilities are outlined in Section 3.2 of the CEMP. Section 7 of this document describes specific responsibilities pertinent to this Plan.

Artefact Heritage is the engaged advisor to oversee matters related to preparation and compliance with the ARD.

## 8.2 Training

All personnel including sub-contractors working on site will undergo induction training relating to heritage management issues before starting work. The induction training will address elements related to heritage management including:

- Existence and requirements of this Plan
- Relevant legislation
- Roles and responsibilities for heritage management, including the need for the Excavation Director to attend site if required
- Location of identified heritage sites and no-go areas
- Proposed heritage management and protection measures
- Procedure to follow in the event of an unexpected heritage find or discovery of human remains

Section 3.4 of the CEMP provides further details regarding staff induction and training.

## 8.3 Monitoring and inspections

Table 7-1 documents specific monitoring requirements for the duration of the Project. This includes the inspection of sensitive areas and activities with the potential to impact heritage items or values.

Regular monitoring of works will be undertaken as described in Section 3.9 of the CEMP. This monitoring will include heritage observations such as checking works remain in the project boundary.

### 8.3.1 Buildings archaeology

Where inspection / monitoring is recommended, the following steps should be taken:

- When a building becomes vacant, an archaeologist should be called in to inspect the interior and assess the potential for buildings archaeology based on the condition of the original structure and any destructive modifications to the areas of potential.
- The archaeologist may at this stage assess that no further archaeological work is required; or
- The archaeologist may advise that monitoring of certain stages of demolition or alterations are required; or

- The archaeologist may advise that a building-specific heritage induction for future workers at the site should take place; and
- That the proposed works may require an Archaeological Assessment, Impact Statement and/or ARD that specifically addresses the potential for buildings archaeology.
- If monitoring is required, any works that are considered sensitive or may require the removal of relics should be monitored by an archaeologist. Short stoppages may take place while the archaeologist records and removes any archaeological artefacts in accordance with the approval.
- A building-specific or works-specific heritage induction may be recommended for all workers involved in certain tasks. This induction will include protocols for the workers to follow if archaeological items are encountered.
- The unexpected finds protocol should be in place at all times.

## 8.4 Auditing

Auditing to assess the effectiveness of environmental controls and compliance with this Plan, CoA, REMMMs, Contractor requirements, and other relevant approvals, licenses and guidelines will be carried out in accordance with the auditing scheduled described in Section 3.10 of the CEMP.

## 8.5 Reporting

In accordance with the CoA, REMMM, and Contractor Requirements:

- CoA E63: the TfNSW **Unexpected Heritage Finds Procedure** was submitted to the Secretary on 25 March 2019.
- CoA E73: the draft **Historical Archaeological Research Design and Excavation Methodology** for Activity A was submitted to OEH as delegate of the NSW Heritage Council on 09 January 2019 following a period of consultation on 17 December 2018. (as per CoA E72). The draft **Historical Archaeological Research Design and Excavation Methodology** for Activity B was submitted to OEH as delegate of the NSW Heritage Council on 26 July 2019.

While carrying out the Project the Proponent (and Contractor) will:

- CoA E75: In the event that non-Aboriginal or post-contact archaeological relics are discovered, the Proponent must prepare and submit an **Archaeological Excavation Report** containing the findings of any excavations, including artefact analysis and the identification of a final repository of any relics. The report will be submitted to the Secretary, for information, within 12 months of completing all archaeological investigations, unless otherwise agreed with the Secretary. The **Archaeological Excavation Report** must also be submitted to the NSW Heritage Council, the local library and the local Historical Society in the local government area. A copy of the **Archaeological Excavation Report** must be provided with the relics.

Section 3.10.4 of the CEMP documents the additional reporting requirements and responsibilities.

# 9 Review and improvement

This section describes how and when this Plan will be updated.

## 9.1 Continuous improvement

Continuous improvement of this Plan will be achieved by the ongoing evaluation of environmental management performance against environmental policies, objectives and targets for the purpose of identifying opportunities for improvement.

The continuous improvement process will be designed to:

- Identify areas of opportunity for improvement of environmental management and performance
- Determine the cause or causes of non-conformances and deficiencies
- Develop and implement a plan of corrective and preventative action to address any non-conformances and deficiencies
- Verify the effectiveness of the corrective and preventative actions
- Document any changes in procedures resulting from process improvement
- Make comparisons with objectives and targets. Due to the short nature of the works at all sites, The Contractor will not implement a formal continuous improvement system but will work proactively with the Environmental Representative to identify and improve environmental management across the project and address any non-compliances.

## 9.2 HMP update and amendment

The processes described in Chapter 3.11.2 of the CEMP may result in the need to update or revise this Plan. This will occur as needed.

Only The Contractor's Environment Manager, or delegate, has the authority to change any of the environmental management documentation. These changes must be approved by the Environmental Representative (ER) or DPIE. The ER has the authority to approve minor amendments to plans in consultation with the DPIE. Only DPIE has the authority to approve major amendments to plans. See Section 3.11.2 in the CEMP.

A copy of the updated plan and changes will be distributed to all relevant stakeholders in accordance with the approved document control procedure (refer to Section 3.11.3 of the CEMP).

# Appendix A – TfNSW Unexpected Heritage Finds Guideline:

The TfNSW Unexpected Heritage Finds Guideline is considered appropriate by the project archaeologists who have authored the Historical Archaeological Research Design and Excavation Methodology (ARD) required by CoA E72.

Although the Unexpected Heritage Finds Guideline (TfNSW, 2015) includes human remains as an example of an unexpected find it does not specify the required procedure for reporting the find.

In the event of identifying potential human remains during construction of the PLR enabling works the following must be undertaken in consultation with the Environmental Representative (ER):

- Stop work and secure the site
- Notify the site manager, the ER and TfNSW
- Engage a technical specialist (archaeologist or forensic anthropologist) to assess the nature of find
- Contact the NSW Police and coroner if remains are found to be human
- Once confirmation is received from the technical specialist that the remains are of human origin, there are three possible statutory pathways to follow based on the assessment:

Forensic case (remains are less than 100 years old): If it is determined by specialist assessment that the remains are forensic, the remains would come under the jurisdiction of the State Coroner and the Coroners Act 2009. The NSW Police would likely secure the site and will advise on the procedure to be followed which would include involvement of the Coroner.

Archaeological – non-Aboriginal human remains (more than 100 years old): Notification to Heritage DPC. Additional consultation and approvals would be required in order to impact remains under the CSSI. The police and coroner may still have involvement in order to confirm that they have no jurisdiction under the Corners act.

Archaeological – suspected Aboriginal human remains (more than 100 years old): The RAPs must be present where it is reasonably suspected that Aboriginal burials or human remains have been encountered. Recording of Aboriginal ancestral remains must be undertaken by, or be conducted under the direct supervision of a specialist. The police and coroner may still have involvement in order to confirm that they have no jurisdiction under the Corners act.

Notification to DPC and the RAPs. Additional consultation and approvals would be required in order to impact remains under the CSSI.

Note that the approval does not allow impact to human remains under the CSSI.

Work will only restart once the requirements of that Guideline have been satisfied.

Where relevant, Aboriginal objects will be registered in AHIMS.



# Unexpected Heritage Finds Guideline

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3TP-SD-115/2.0

Supporting Document – Applicable to Transport Projects  
Delivery Office

## Quality Management System

Status:	Approved
Version:	2.0
Branch:	Planning and Environment Services
Business unit:	Environmental Management
Date of issue:	14 April 2015
Review date:	14 April 2016
Audience:	Project Delivery/External TSR
Asset classes:	<input checked="" type="checkbox"/> Heavy Rail; <input checked="" type="checkbox"/> Light Rail; <input checked="" type="checkbox"/> Multi Sites; <input checked="" type="checkbox"/> Systems; <input checked="" type="checkbox"/> Fleets
Project delivery model:	TP Project/Alliance/Novo Rail
Project type:	Not Applicable
Project lifecycle:	<input type="checkbox"/> Feasibility; <input type="checkbox"/> Scoping; <input type="checkbox"/> Definition; <input checked="" type="checkbox"/> Construction readiness; <input checked="" type="checkbox"/> Implementation; <input checked="" type="checkbox"/> Finalisation; <input type="checkbox"/> Not applicable
Process owner:	Technical Director Planning and Environment Services

## Document history

Version	Date of approval	Doc. control no.	Notes
1.0	11 July 2014	3164499_5	First issue
2.0	14 April 2015	3164499	Updated to be published to TfNSW website

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## 1. Purpose

The purpose of this document is to provide guidance to site personnel in the event that an unexpected heritage find is encountered on a Transport Projects Delivery Office (TPO) site.

An 'unexpected heritage find' can be defined as any unanticipated archaeological discovery, that has not been previously assessed or is not covered by an existing excavation permit, and that has potential heritage value.

In New South Wales, there are strict laws to protect and manage heritage objects and relics. As a result, appropriate heritage management measures need to be implemented to minimise impacts on heritage values, ensure compliance with relevant heritage notification and other obligations, and to minimise the risk of penalties to individuals, TPO and its contractors.

## 2. Scope

In some instances, even when appropriate and robust cultural heritage assessments are undertaken during the environmental impact assessment process, some heritage objects or relics are not identified, and are subsequently found on a TPO site. This guideline outlines the procedure that should be followed in those circumstances.

This guideline includes references to some of the relevant legislative and regulatory requirements but is not intended to replace them. It is not intended to replace any requirements identified as part of the environmental impact assessment process

This guideline does not apply to:

- Aboriginal and non-Aboriginal cultural heritage objects or relics found during investigations undertaken to inform the environmental assessment, in accordance with relevant legislation and the [Guide for Planning and Environmental Approvals – 2TP-ST-051](#). These environmental impact assessments typically identify all heritage items before the project is implemented
- cultural heritage investigations undertaken to comply with conditions set out in any land use planning approval for a project
- archaeological investigations permitted under the *National Parks and Wildlife Act 1974* (NPW Act) or the *Heritage Act 1977* (Heritage Act).

## 3. Definitions

All terminology in this document is taken to mean the generally accepted or dictionary definition with the exception of the following terms which have a specifically defined meaning:

<b>CEMP</b>	Construction environmental management plan
<b>EM</b>	Contractor/alliance environment manager
<b>EP&amp;A Act</b>	NSW <i>Environmental Planning and Assessment Act 1979</i>
<b>EPM</b>	TPO environment and planning manager
<b>Heritage Act</b>	NSW <i>Heritage Act 1977</i>
<b>NPW Act</b>	NSW <i>National Parks and Wildlife Act 1974</i>
<b>NSW</b>	New South Wales
<b>OEH</b>	NSW Office of Environment and Heritage

<b>PME</b>	Principal Manager Environmental Management
<b>TPO</b>	Transport Projects Delivery Office (TfNSW)
<b>TSR</b>	TfNSW Standard Requirement

## 4. Accountabilities

The Technical Director Planning and Environment Services is accountable for this document including authorising the document, monitoring its effectiveness and performing a formal document review.

Project directors are accountable for ensuring the requirements of this document are implemented within their area of responsibility.

Project directors who are accountable for specific projects/programs are accountable for ensuring associated contractors follow this document to the extent they are required under TSR E – Environmental Management and the contract.

Contractors are accountable for following this document, where this guideline forms a part of their contract.

## 5. Legislative requirements

Table 1 identifies some of the relevant legislation/regulations for the protection of heritage and the management of unexpected heritage finds in NSW. It should be noted that significant penalties exist for breaches of the listed legislation as a result of actions that relate to unauthorised impacts on heritage items. Further, it is noted that heritage that has been assessed and is being managed in accordance with an environmental impact assessment is exempt from these offences.

To avoid breaches of legislation, it is important that TPO and its contractors are aware of their legislative obligations under relevant legislation and that appropriate management measures are in place to avoid impacts on unexpected heritage items during construction. Contractors/alliances will need to ensure that they undertake their own due diligence to identify any other legislative requirements that map apply for a given project.

**Table1 Legislation and guidelines for management of unexpected heritage finds**

Relevant Requirement	Objectives and offences
<b><i>Environmental Planning and Assessment Act 1979 (EP&amp;A Act)</i></b>	Requires heritage to be considered within the environmental impact assessment of projects.  This guideline is based on the premise that an appropriate level of Aboriginal and non-Aboriginal cultural heritage assessment and investigations and mitigation have already been undertaken under the relevant legislation, including the EP&A Act, during the assessment and determination process. It also assumes that appropriate mitigation measures have been included in the conditions of any approval.
<b><i>National Parks and Wildlife Act 1974 (NPW Act)</i></b>	Provides for the protection and management of Aboriginal objects.  An Aboriginal object is defined as: <i>'any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains'</i> .

Relevant Requirement	Objectives and offences
	<p>It is an offence to harm or desecrate an Aboriginal object or place. These are strict liability offences. An offence cannot be upheld where the harm or desecration was authorised by an Aboriginal heritage impact permit and the permit's conditions were not contravened.</p> <p>A person must notify the Heritage Branch of OEH if a person is aware of the location of an Aboriginal object.</p> <p>Penalties for some of the offences can include 2 years imprisonment and/or up to \$550,000 (for individuals), and a maximum penalty of \$1.1million (for corporations).</p>
<b>Heritage Act 1977</b>	<p>Provides for the care, protection and management of relics.</p> <p>A relic is defined as: <i>'any deposit, artefact, object or material evidence that: (a) relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement, and (b) is of State or local heritage significance.'</i></p> <p>It is an offence to disturb or excavate any land knowing or having reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed, unless the disturbance or excavation is carried out in accordance with an excavation permit issued by the Heritage Branch of the OEH.</p> <p>A person must notify the Heritage Branch of OEH, if a person is aware or believes that they have discovered or located a relic. Penalties for offences under the Heritage Act can include 6 months imprisonment and/or up to \$1.1million.</p>

## 6. Unexpected heritage finds protocol

### 6.1. What is an unexpected heritage find?

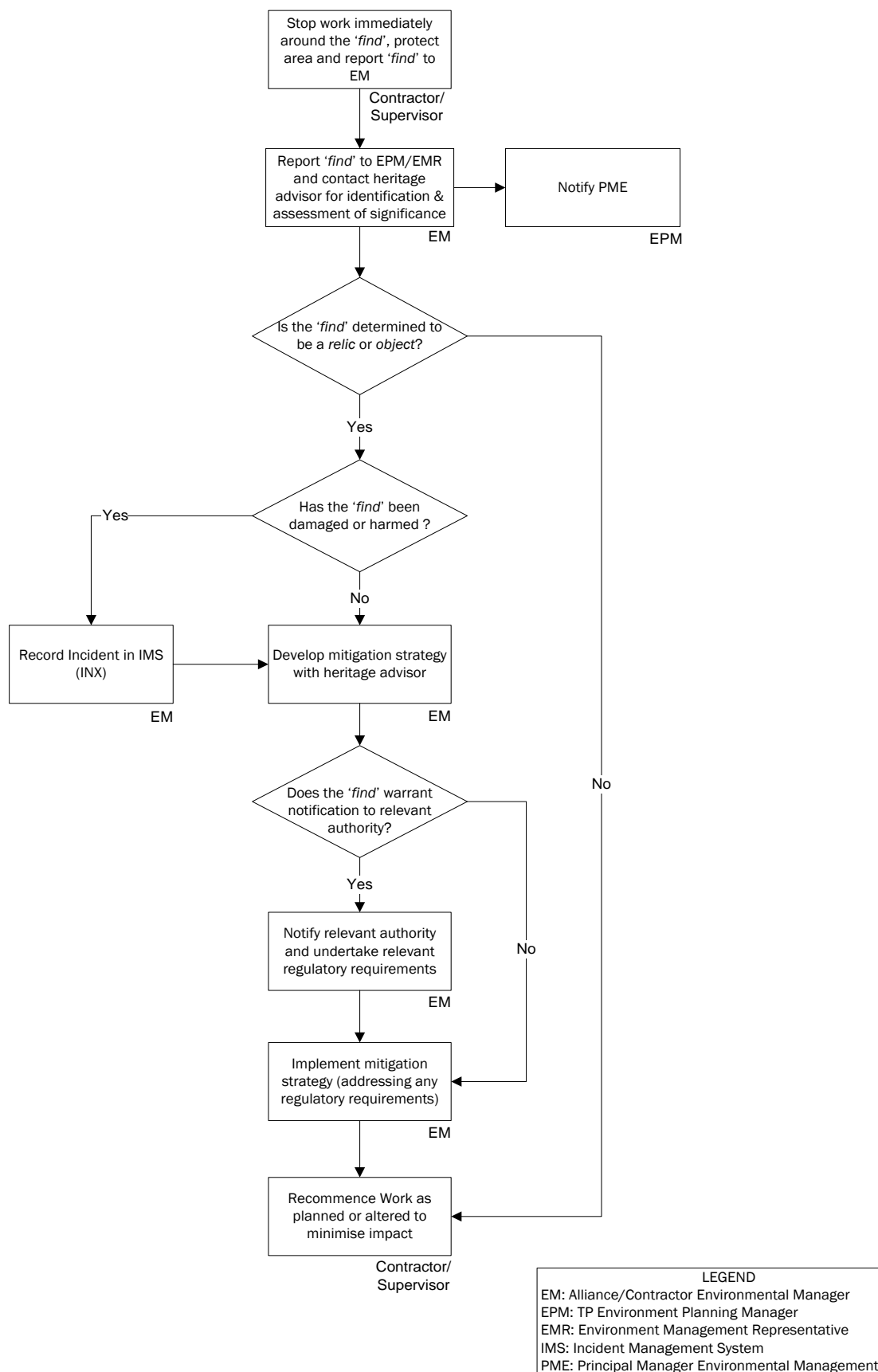
An 'unexpected heritage find' can be defined as any unanticipated archaeological discovery that has not been identified during a previous assessment or is not covered by an existing permit under relevant legislation such as the NPW Act or Heritage Act. The find may have potential cultural heritage value, which may require some type of statutory cultural heritage permit or notification if any interference of the heritage item is proposed or anticipated.

The range of potential archaeological discoveries can include but are not limited to:

- Aboriginal stone artefacts, shell middens, burial sites, engraved rock art, scarred trees
- remains of rail infrastructure including buildings, footings, stations, signal boxes, rail lines, bridges and culverts
- remains of other infrastructure including sandstone or brick buildings, wells, cisterns, drainage services, conduits, old kerbing and pavement, former road surfaces, timber and stone culverts, bridge footings and retaining walls
- artefact scatters including clustering of broken and complete bottles, glass, ceramics, animal bones and clay pipes
- archaeological human skeletal remains.

## **6.2. Managing unexpected heritage finds**

In the event that an unexpected heritage find (the 'find') is encountered on a TPO site, the flowchart in Figure 1 should be followed. Table 2 indicates roles and responsibilities referred to in Figure 1.



**Figure 1: Unexpected heritage finds flowchart**

**Table 2: Roles and responsibilities within Figure 1**

Abbreviation used in flowchart	Role	Responsibility or role under this Guideline
Contractor/supervisor	Contractor / supervisor	Stop work immediately when an unexpected heritage find is encountered. Cordon off area until EM advises that work can recommence.
EM	Contractor or alliance environment manager	Manage the process of identifying, protecting and mitigating impacts on the 'find'. Liaise with heritage advisor and relevant authorities on significance of the find, mitigation and regulatory requirements. Complete incident report and review CEMP for any changes required. Propose amendments to the CEMP if any changes are required. Advise Contractor / supervisor to recommence work.
Heritage advisor	Contractor's or project heritage advisor or consultant	Provide expert advice to the EM on 'find' identification, significance, mitigation, legislative procedures and regulatory requirements.
EPM	TPO environment and planning manager	Notify PME of 'find' and manage incident reporting once completed by EM.
Relevant authorities	Environment Protection and Regulation Group of OEH (for Aboriginal objects)	Regulate the care, protection and management of Aboriginal objects. Issue Aboriginal heritage impact permits.
	Heritage Branch of OEH (for relics)	Regulate the care, protection and management of relics. Issue excavation permits.

## 7. Related documents and references

### Related Documents

[Environmental Incident Classification and Reporting – 9TP-PR-105](#)  
[Guide to Environmental Control Map – 3TP-SD-015](#)



[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, 19 February 2019 2:50 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** [External] RE: Unexpected Finds Procedure Certification

Hi [REDACTED]

The UFP is appropriate to be used for the project.


Regards  
[REDACTED]

[REDACTED]  
**Managing Director**

**ARTEFACT**

**Telephone:** [REDACTED] **Mobile:** [REDACTED]  
**Address:** Level 4, Building B, 35 Saunders Street, Pyrmont NSW 2009  
**Web:** [www.artefact.net.au](http://www.artefact.net.au)

Cultural Heritage Management | Archaeology | Heritage Interpretation

 We acknowledge the Traditional Custodians of Country in which we live and work, and pay our respects to them, their culture and their Elders past, present and future

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If you are not the intended recipient you must not disseminate, copy or take any action in reliance upon it.  
If you received this in error, please notify us immediately.

---

**From:** [REDACTED]  
**Sent:** Tuesday, 19 February 2019 1:53 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Unexpected Finds Procedure Certification

Hi [REDACTED]

Please find attached a copy of the Unexpected Finds Procedure proposed for use on the Hawkesbury Road Widening Works.

This is the TfNSW UFP (document number 3TP-SD-115/2.0)

In accordance with CoA E62, could you please provide written certification of this procedure?

Kind Regards,

[REDACTED]

Arup  
Level 5, 151 Clarence Street, Sydney NSW 2000  
d: [REDACTED] skype: [REDACTED]  
[www.arup.com](http://www.arup.com)

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, 8 January 2020 7:10 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** [External] RE: HMP revised

Hi [REDACTED]

The TfNSW UFP (document number 3TP-SD-115/2.0) is appropriate to be used on the PLR early works Activities B and C.

Regards


[REDACTED]

[REDACTED]  
**Managing Director**

**ARTEFACT**

**Telephone:** [REDACTED] **Mobile:** [REDACTED]  
**Address:** Level 4, Building B, 35 Saunders Street, Pyrmont NSW 2009  
**Web:** [www.artefact.net.au](http://www.artefact.net.au)

Cultural Heritage Management | Archaeology | Heritage Interpretation

 *We acknowledge the Traditional Custodians of Country in which we live and work, and pay our respects to them, their culture and their Elders past, present and future*

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# Appendix B – Consultation

# Appendix B1 - Activity A: Hawkesbury Road Widening

This is a log of consultation with the following Government Stakeholders as per CoA A5, C3(d) and E74:

- Office of Environment and Heritage (OEH)
- City of Parramatta Council (CoPC)
- NSW Heritage Council

Table B1: Log of consultation with stakeholders as per A5 (b) and (c)

Table B2: Outline of issues raised, how they have been addressed, including evidence that party is satisfied the issues have been addressed CoA A5(d) and (e)

Table B1: Engagement log with government stakeholders

In / Out	Date	Type of Communication	Stakeholders
Outgoing	06 December 2018 5.33pm	Email: Invitation from Arup ( [REDACTED] ) to attend Workshop on 17 December 2018	INVITEES COPC: [REDACTED] OEH: [REDACTED]
Outgoing	06 December 2018 7.26pm	Email: Invitation from Arup ( [REDACTED] ) to attend Workshop on 14 January 2019	INVITEES COPC: [REDACTED] OEH: [REDACTED]
Outgoing	14 December 2018 2.45pm	Email: [REDACTED] sent a reminder to invitees who did not accept and alternative attendees to the Workshop on 17 December 2018	INVITEES COPC: [REDACTED] OEH: [REDACTED]
Workshop	17 December 2018 1-4pm	Workshop: TfNSW Offices [REDACTED]	ATTENDEES COPC: [REDACTED]
Outgoing	17 December 2018 10.26pm	Email: [REDACTED] emailed the Heritage Management Plan and Archaeological Research Design to Stakeholders for consultation and review.	STAKEHOLDERS OEH: [REDACTED] [REDACTED]
Outgoing	20 December 2018 3.19pm	Email: [REDACTED] emailed the Heritage Management Plan and Archaeological Research Design to Stakeholders for consultation and review.	STAKEHOLDERS COPC: [REDACTED] OEH: [REDACTED] [REDACTED]
Outgoing	11 January 2018 6.44pm	Email: [REDACTED] sent a reminder to attendees for the Workshop on 14 January 2019	INVITEES COPC: [REDACTED] OEH: [REDACTED]

Workshop	14 January 2018 1pm-1.30pm	Workshop: TfNSW Offices [REDACTED]	<b>ATTENDEES</b> <b>COPC:</b> [REDACTED] <b>OEH:</b> [REDACTED]
Outgoing	15 January 2019 5.35pm	Email: [REDACTED] emailed the Heritage Management Plan and Archaeological Research Design to Stakeholders for consultation and review.	<b>STAKEHOLDERS</b> <b>OEH:</b> [REDACTED] [REDACTED]
Outgoing	18 January 2019 10.48am	Email [REDACTED] sent email reminder to stakeholders of consultation closing for Heritage Management Plan on 21 January 2019.	<b>STAKEHOLDERS</b> <b>COPC:</b> [REDACTED] <b>OEH:</b> [REDACTED] [REDACTED]
Incoming	23 January 2019 12.00pm	Email Comments received from OEH  Comment reference numbers: 1 – 5	<b>STAKEHOLDERS</b> <b>OEH:</b> [REDACTED] [REDACTED]
Outgoing	25 January 2019 4.28pm	Email [REDACTED] sent email reminder to stakeholders of consultation closing for Heritage Management Plan on 21 January 2019.	<b>STAKEHOLDERS</b> <b>OEH:</b> [REDACTED] [REDACTED]
Incoming	25 January 2019 4.30pm	Email Comments received from OEH, Planning Team Greater Sydney Branch  Comment reference numbers: 6	<b>STAKEHOLDERS</b> <b>OEH:</b> [REDACTED]
Incoming	31 January 2019 5.06pm	Email Comments received from COPC  Comment reference numbers: 7, 8	<b>STAKEHOLDERS</b> <b>COPC:</b> [REDACTED]

Outgoing	06 March 2019 12.54pm	Email [REDACTED] sent out updated HMP to stakeholders requesting review the Plan to ensure that their comments have been addressed satisfactorily.	<b>STAKEHOLDERS</b> <b>COPC:</b> [REDACTED]
Outgoing	08 March 2019 4.44pm	Email [REDACTED] sent follow-up email to COPC to request comments.	<b>STAKEHOLDERS</b> <b>COPC:</b> [REDACTED]
Outgoing	12 March 2019 1.44pm	Email [REDACTED] sent follow-up email to COPC to request comments.	<b>STAKEHOLDERS</b> <b>COPC:</b> [REDACTED]
Incoming	12 March 2019 1.44pm	Email [REDACTED] - she had no response from their Heritage Specialist yet.	<b>STAKEHOLDERS</b> <b>COPC:</b> [REDACTED]
Outgoing	19 March 2019 2.46pm	Email [REDACTED] sent follow-up email to COPC to request comments.	<b>STAKEHOLDERS</b> <b>COPC:</b> [REDACTED]
Outgoing	20 March 2019 1.08pm	Email [REDACTED] sent follow-up email to COPC to request comments by COB.	<b>STAKEHOLDERS</b> <b>COPC:</b> [REDACTED]
Incoming	20 March 2019 1.44pm	Email [REDACTED] closing out comments reference numbers 07 and 08.	<b>STAKEHOLDERS</b> <b>COPC:</b> [REDACTED]



Table B2: Log of issues raised by government stakeholders

Comment Reference No.	Comment	How addressed and management plan reference	A description of any outstanding issues and the reason why
OEH			
1	The Division notes the commitments in the EIS and PIR for investigation of the identified former cemetery in Zone 2 for HAMU 2 has been revised in the Research Design to an Unexpected Finds Protocol. This follows additional research undertaken for the ARD for the identified general c.1859 Cemetery. The Heritage Division notes there may now be a lack of consistency between the commitments in the PIR/EIS for the project and the approach being undertaken for this Enabling package, with unexpected finds rather than detailed archaeological investigation now proposed.	Management Measure HER3, Section 7: The Excavation Director would oversee archaeological works. In accordance with E74 the Excavation Director would attend site where required to appropriately manage archaeological works. The Excavation Director would have the authority to advise on the duration and extent of oversight required during excavation.  The environmental control maps will identify this heritage area and appropriate management measures.	Closed
2	Section 1.3: It would be clearer if the scope of the sub plan states this document forms one of several enabling works packages to be undertaken prior to the Infrastructure Construction commencing	<b>Section 1.3:</b> Text has been updated to reflect this	Closed
3	It is noted no heritage items will be impacted by the Enabling Works. The CEMP sub plan clearly outlines the parts of the PLR which will be considered and managed within the HWR part of this project. This approach is clear and supported.	N/A	Closed
4	Section 3: Responses under EMMM are established against all conditions relevant to heritage	N/A	Closed
5	There is adequate reference to adoption of the unexpected finds protocol for this package of works and description of that protocol	N/A	Closed

Comment Reference No.	Comment	How addressed and management plan reference	A description of any outstanding issues and the reason why
OEH, Planning Team Greater Sydney Branch			
6	Planning Team Greater Sydney Branch, Office of Environment and Heritage has no comments to make	N/A	Closed
COPC			
7	Council believes that the documents should pay more attention to built heritage items and structures as the report generally focuses on Archaeology. Suggest to review the prescribed approach, determine whether it is suitable for each individual site and prepare a more tailored approach for each specific site.	<p>There are no listed built heritage items in the impact area. Information has been provided on adjacent items and exclusion zones. The ARDs purpose is to deal with archaeology only.</p> <p>The Heritage Management sub plan has been prepared to identify and protect built heritage structures in the surrounding area.</p>	Closed
8	Council believes these documents are overly voluminous and ineffective to navigate by the end-users when on site. Consider deriving a document which will be more site specific and summarises the actions which are applicable to each site, allowing for clearer and certain use by end users.	The CHMP is in standard TfNSW format and includes information as required by DPE under the approval conditions. The ARD includes management mapping and a summary section which would serve as an easy reference guide.	Closed

# Appendix B2 - Activity B and C: Cumberland Hospital (East and West campus) Demolition

This is a Log of consultation with the following Government Stakeholders as per CoA A5, C3(d) and E74:

- City of Paramatta Council (CoPC)
- Department of Premier and Cabinet (Heritage) (Formerly: Office of Environment and Heritage (OEH))
- NSW Health
  - HETI
  - Western Sydney Local Health District (WSLHD)
- NSW Heritage Council

Table B3: Log of consultation with stakeholders as per A5 (b) and (c)

Table B4: Outline of issues raised, how they have been addressed, including evidence that party is satisfied the issues have been addressed CoA A5(d) and (e).

Table B3: Engagement log with government stakeholders

In / Out	Date	Type of Communication	Stakeholders
Outgoing	8 July 2019 5:12pm	Email: Invitation from Arup ( ) to attend workshop on 23 July 2019	<b>INVITEES</b> <b>Department of Premier and Cabinet (Heritage):</b> <b>NSW Heritage Council:</b> 
Outgoing	8 July 2019 5:52pm	Email: Invitation from Arup ( ) to attend workshop on 23 July 2019	<b>INVITEES</b> <b>CoPC:</b> 
Outgoing	12 July 2019 3:46pm	Email: Invitation from Arup ( ) to attend Workshop on 29 July 2019	<b>INVITEES</b> <b>WSLHD:</b> 
Outgoing	12 July 2019 4:53pm	Email: Invitation from Arup ( ) to attend workshop on 24 July 2019	<b>INVITEES</b> <b>HETI:</b> <b>WSLHD:</b> 
Workshop	23 July 2019 9am – 12:00pm	Workshop:  	<b>ATTENDEES</b> <b>CoPC:</b> <b>Department of Premier and Cabinet (Heritage):</b> 
Workshop	24 July 2019 1pm – 2:45pm	Workshop:  Cumberland Hospital Comment reference numbers: 1, 2	<b>ATTENDEES</b> <b>HETI:</b> <b>WSLHD:</b> 
Outgoing	26 July 2019 9:28am	Email: Arup ( ) issued the Management Plan to stakeholders to review	<b>STAKEHOLDERS</b> <b>CoPC:</b> <b>Department of Premier and Cabinet (Heritage):</b>  <b>Council:</b> 

In / Out	Date	Type of Communication	Stakeholders
Workshop	29 July 2019 10am – 11:45am	Workshop: [REDACTED]	<b>ATTENDEES</b> <b>WSLHD:</b> [REDACTED] [REDACTED]
Outgoing	29 July 2019 6:16pm	Email: Arup [REDACTED] issued the Management Plans to stakeholders for review	<b>STAKEHOLDERS</b> <b>HETI:</b> [REDACTED] <b>WSLHD:</b> [REDACTED] [REDACTED]
Incoming	6 August 2019 3:52pm	Email: Comments received from WSLHD Comment reference numbers: 10	<b>STAKEHOLDERS</b> <b>WSLHD:</b> [REDACTED]
Incoming	6 August 2019 5:44pm	Email: Comments received from WSLHD Comment reference numbers: 11  This was also received from [REDACTED] [REDACTED] 8 August 2019 12:51pm.	<b>STAKEHOLDERS</b> <b>WSLHD:</b> [REDACTED]
Incoming	8 August 2019 11:27am	Email: Comments received from WSLHD Comment reference numbers: 12	<b>STAKEHOLDERS</b> <b>WSLHD:</b> [REDACTED]
Incoming	12 August 2019 12:03pm	Email: Comments received from WSLHD Comment reference numbers: 13	<b>STAKEHOLDERS</b> <b>WSLHD:</b> [REDACTED]
Outgoing	12 August 2019 12:48pm	Email: Arup ([REDACTED]) sent email reminder to stakeholders of consultation closing for Heritage Management Plan on 13 August 2019	<b>STAKEHOLDERS</b> <b>CoPC:</b> [REDACTED]

In / Out	Date	Type of Communication	Stakeholders
Outgoing	12 August 2019 12:59pm	Email: Arup ( ) sent email reminder to stakeholders of consultation closing for Heritage Management Plan on 13 August 2019	<b>STAKEHOLDERS</b> <b>Department of Premier and Cabinet (Heritage):</b> ( ) ( ) <b>NSW Heritage Council:</b> ( ) ( )
Incoming	13 August 2019 3:03pm	Email: Comments received from Department of Premier and Cabinet (Heritage) and NSW Heritage Council  Comment reference numbers: Department of Premier and Cabinet (Heritage): 1-9 NSW Heritage Council: 14	<b>STAKEHOLDERS</b> <b>Department of Premier and Cabinet (Heritage):</b> ( ) ( ) <b>NSW Heritage Council:</b> ( ) ( )
Outgoing	20 August 2019 11:25am	Email: Arup ( ) reminded stakeholders of closed consultation period and requested comments.	<b>STAKEHOLDERS</b> <b>CoPC:</b> ( )
Outgoing	22 August 2019 12:02pm	Phone: Arup ( ) called stakeholders to follow up about consultation and left a message on voicemail.	<b>STAKEHOLDERS</b> <b>CoPC:</b> ( )
Outgoing	27 August 2019 2:03pm	Email: Arup ( ) emailed CoPC requesting comments on plan.	<b>STAKEHOLDERS</b> <b>CoPC:</b> ( )
Incoming	28 August 2019 6:08pm	Email: CoPC stated that they would follow up with comments on 29 August 2019	<b>STAKEHOLDERS</b> <b>CoPC:</b> ( )
Outgoing	11 November 2019 9:26am	Email: Arup ( ) issued the Heritage Management Plan to stakeholders to close comments.	<b>STAKEHOLDERS</b> <b>Department of Premier and Cabinet (Heritage):</b> ( ) <b>NSW Heritage Council:</b> ( ) ( )
Outgoing	18 November 2019 9:32am	Call: Arup ( ) contacted Department of Premier and Cabinet (Heritage) to follow up on close of consultation.  Voicemail was left.	<b>STAKEHOLDERS</b> <b>Department of Premier and Cabinet (Heritage):</b> ( )
Outgoing	18 November 2019 1:52pm	Email: Arup ( ) contacted Department of Premier and Cabinet (Heritage) to follow up on close of consultation.	<b>STAKEHOLDERS</b> <b>Department of Premier and Cabinet (Heritage):</b> ( )

In / Out	Date	Type of Communication	Stakeholders
Incoming	18 November 2019 1:53pm	Email: Automatic reply from Department of Premier and Cabinet (Heritage) advising an alternative out of office contact	<b>STAKEHOLDERS</b> <b>Department of Premier and Cabinet (Heritage):</b> [REDACTED]
Outgoing	19 November 2019 9:36am	Email: Arup ([REDACTED]) contacted Department of Premier and Cabinet (Heritage) to follow up on close of consultation	<b>STAKEHOLDERS</b> <b>Department of Premier and Cabinet (Heritage):</b> [REDACTED] [REDACTED]
Outgoing	25 November 2019 11:14am	Call: Arup ([REDACTED]) contacted Department of Premier and Cabinet (Heritage) to follow up on close of consultation.	<b>STAKEHOLDERS</b> <b>Department of Premier and Cabinet (Heritage):</b> [REDACTED]
Incoming	25 November 2019 11:30am	Call: Department of Premier and Cabinet (Heritage) called to discuss close of consultation.	<b>STAKEHOLDERS</b> <b>Department of Premier and Cabinet (Heritage):</b> [REDACTED]
Incoming	25 November 2019	Letter: Letter received from Department of Premier and Cabinet (Heritage) closing consultation.	<b>STAKEHOLDERS</b> <b>Department of Premier and Cabinet (Heritage):</b> [REDACTED] [REDACTED]



Table B4: Log of issues raised by government stakeholders

Comment Reference No.	Comment	How addressed and management plan reference	A description of any outstanding issues and the reason why
CoPC			
N/A	No comments received from CoPC	N/A	N/A
Department of Premier and Cabinet (Heritage)			
1	1.2.3 (pg 7) states buildings are to be demolished down to slab level. The buildings all appear to be suspended slabs. It is unclear if any demolition will occur under slab level. Clarification required.	Clarification added as a footnote in Section 1.2.3 and 1.2.4 to specify no under slab demolition	Closed
2	3.3 (pg 15) should include reference to MMM VL-17 construction compounds; AB-4 exclusion zones; and, NV-7 vibration controls	Three additional REMMMS added to Table 3-2	Closed
3	HE-22 (pg 31) it is noted that no vibration impacts have been identified within Activity B. However, there are a number of significant buildings, in particular Building c52, adjacent to building proposed to be demolished. Further clarification is required to ensure impacts to significant buildings and landscaping (including sandstone kerbing) is avoided	HER7 addresses Heritage consultant and Heritage DPC review of demolition methodologies. Added to HE-22 as a reference.  No vibration intensive plant shall be used for Activity B therefore impacts to surrounding buildings and the sandstone kerbing from vibration shall not be significant.  In addition, areas including sandstone kerbing have been identified as no-go areas in the environmental control maps.	Closed
4	5.2.3 (pg 45) the demolition and make good methodology should be reviewed by the Heritage Division - prior to demolition	Review by Heritage DPC added to Section 5.2.3	Closed

Comment Reference No.	Comment	How addressed and management plan reference	A description of any outstanding issues and the reason why
5	Table 6-2 (pg 50) Management should include vibration monitoring	The assessment of vibration impacts is included in Appendix C of the noise and vibration management plan. No vibration intensive equipment will be used for either Activity B or C and therefore vibration monitoring is not required as impacts would be negligible.	Closed
6	7 (pg 51) should include reference to MMM VL-17 construction compounds; AB-4 exclusion zones; and NV-7 vibration controls	Reference to AB-4 included in H2, VL-17 addressed in additional management measure HER9.  As noted in response to comment 5, no vibration management is required as vibration intensive plant will not be used.  The site compounds have been selected to avoid heritage areas where possible based on information available from the EIS.  Site compounds shall be installed as per the Environmental Control Maps and Section 4.6 of the CEMP.	Closed
7	H4 (pg 55) Any future revision of this Plan should be referred to the Heritage Division for review	Text added to H4 - Any future revision of this Plan shall be referred to the Heritage Division for review	Closed
8	HER7 (pg 60) The Heritage Division should be included in reviewing the make good methodologies to building B52	Heritage Division/Heritage DPC review of demolition and make good methodology added, prior to demolition occurring.	Closed

Comment Reference No.	Comment	How addressed and management plan reference	A description of any outstanding issues and the reason why
9	HER8 (pg 60) This should be provided prior to works occurring and the allowance of appropriate time for the Heritage Division to review and comment.	Consultation has occurred with Heritage DPC throughout the preparation of this plan. The wording of HER8 has been amended and Section 4 outlines the consultation process.  Further advice memos if required, should an unexpected find require a change to the detailed design, will be supplied to Heritage DPC for a consultation period of two weeks.	Closed
NSW Health (WSLHD)			
10	No objections to the application of 'unexpected finds procedure' but this was not attached at Appendix A on pg 64. Accordingly, it was unclear how such finds/actions would be communicated to the LHD. Consistent with feedback in other sub-plans, it is recommended that this should form part of a Communication Plan with WSLHD staff working in Cumberland East and West.	Noted, UFP has been included as an appendix in final version	Closed
11	Cumberland Hospital was officially established in December 1849, so is approaching its "170th Birthday" later this year. Within a number of staff families, multiple generations have proudly worked at Cumberland Hospital. They have strong ties to the location, the buildings and to the long-standing patients they worked with over extended periods of time.  At the workshop and subsequently, a number of staff identified that a large mural in the part of building B52 listed for demolition is	Noted as per comment 13 below that mural will not be impacted	Closed

Comment Reference No.	Comment	How addressed and management plan reference	A description of any outstanding issues and the reason why
	important to retain as it was painted by a patient over an extended period of time. Apparently at an earlier date a petition was signed by 40+ staff to ensure its continuation. The creativity and tenacity of that painter patient is respected and so it is very important that efforts be made to transfer it to a new location e.g capture images of the large mural prior to demolition as outlined in the draft heritage sub-plan.		
12	Agree with above - nil further	N/A	Closed
13	since doing the response that was submitted last week, we've worked out that the mural referred to in the 'Heritage' section of the paper is NOT in the to-be-demolished section of building B52. However, it is nearby so the demolition process will need to take that into account and take care of the mural. I understand this has been raised with the builder already in the weekly site meetings.	N/A	Closed
NSW Heritage Council			
14	No specific comments provided on Heritage Management Plan, comments have been included in the ARD	N/A	N/A

