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File No: SF18/95643 Ref No: DOC18/838807 Your Ref: SSI 8931

Keith Ng Senior Planning Officer Transport Assessments Department of Planning & Environment GPO Box 39 SYDNEY NSW 2001

By email: keith.ng@planning.nsw.gov.au

Dear Mr Ng

RE: HERITAGE DIVISION COMMENTS ON EXHIBITION OF F6 EXTENSION STAGE 1 (SSI 8931)

I refer to your letter 2 November 2018 inviting comments and recommended conditions of consent on the above State Significant Infrastructure application which includes:

- An underground connection to the New M5 at Arncliffe;
- Twin motorway tunnels between the New M5 at Arncliffe and Rockdale Bicentennial Park. Each tunnel would be around four kilometres in length;
- A tunnel portal at Brighton-Le-Sands within Rockdale Bicentennial Park (within the existing F6 reserved corridor) connecting to on-and off-ramps;
- A new road interchange at Brighton-Le-Sands within Rockdale Bicentennial Park and Memorial Fields (within the existing F6 reserved corridor), to provide connections to President Avenue, Kogarah;
- A widened President Avenue at the location of the interchange with the project, including slip lanes to provide a connection to the project;
- Mainline tunnel stubs to allow for connections to the future stages of the F6 Extension;
- Ancillary infrastructure and operational facilities for signage (including electronic signage), ventilation structures and systems, operational water treatment facility, fire and safety systems, and emergency evacuation and smoke extraction infrastructure;
- New service utilities and modifications to existing service utilities; and
- Temporary construction and ancillary facilities and temporary works to facilitate the construction of the project.

A search of relevant heritage registers shows:

- There are no SHR items within the project area.
- Two SHR items are located well above the proposed tunnel locations:

- Arncliffe Market Gardens (SHR No. 01395).
- o Wilsons Farm House (SHR No. 00487).
- Three items listed in Schedule 5 of the Rockdale LEP are located within or adjacent to the project area:
 - Kings Wetland (within project area)
 - Patmore Swamp (within project area)
 - o Brighton-Le-Sands Public School (adjacent to project area).
- There are an additional 17 sites listed in Schedule 5 of the Rockdale LEP 2011 and Kogarah LEP 2012 that are located well above the tunnel route.

Chapter 19 and Appendix N of the Environmental Impact Statement (EIS) address cultural heritage issues and conclude:

- The project will result in potential impacts to both the local heritage listed items, Kings Wetland and Patmore Swamp.
- Impacts to the Kings Wetland site will involve the removal of vegetation along the eastern boundary of the site. At the end of construction works, the area will be rehabilitated back to the original state of the wetlands prior to construction.
- Impacts to Patmore Swamp include the acquisition of a 30-metre strip along the frontage of President Avenue for the upgrade of President Avenue. A shared pedestrian and cyclist bridge will also be constructed over President Avenue. The shared pedestrian and cycle pathway will continue south through Patmore Swamp and will link up with Annette Avenue. This section of the shared pathway will be raised above the current ground level of Patmore Swamp. The shared pathway will be approximately 150 metres long and up to six metres at its widest point through the swamp.
- Analysis of mapped heritage items has identified there is only one heritage item within 25 metres of the proposed surface works with a potential for vibration impacts. This is the locally significant Shop and Residence (Kogarah LEP 2012 item 97). No direct impacts are proposed for this item which is located at 111 Princes Highway, adjacent to proposed surface works in that area (approximately seven metres from the closest work area location).

I provide the following advice based on our review of the information provided.

Kings Wetland

- The proposed haulage road will impact vegetation on the eastern side of Kings Wetland.
- The area to the south of Kings Road forms part of the 1940s reclamation works. The area to the north of Kings Road is remnant vegetation.
- A landscape rehabilitation plan is proposed to be developed in conjunction with Bayside Council.
- There is no detail in the EIS that shows the exact route of the haulage road and where it will feed into the existing road network adjacent to Kings Wetland.
- Remnant vegetation in Kings Wetland is an important part of its identified significance.
 Damage to remnant vegetation is to be avoided.

Patmore Swamp

- A 30m section of Patmore Swamp will be reclaimed for the President Avenue Upgrade.
- A new shared cycle-pedestrian way will be constructed through Patmore Swamp.
- The total area to be impacted is approximately 4% of the Patmore Swamp.
- Protection areas will be established alongside works areas in Patmore Swamp to limit extent of damage
- A heritage interpretation strategy is proposed to be prepared to outline opportunities for interpretation to be integrated into the design of the shared cycle and pedestrian pathway through Patmore Swamp.
- No specific detail around the content, approach or timing of the heritage strategy has been provided.
- The Construction Heritage Management Plan to be prepared for the project should contain a timeline for the development and implementation of the heritage interpretation strategy for Patmore Swamp.

General Matters

- The proponent has committed to the preparation of a Construction Heritage Management Plan for the project. The plan will detail measures to minimise impacts on identified heritage features within the project boundary and will also detail procedures to manage unexpected heritage finds.
- An archaeological assessment was completed as part of the Statement of Heritage Impact. No historical archaeological sites were identified or predicted. The commitment to manage unexpected finds through the Construction Heritage Management Plan is appropriate.

Recommendations

The following conditions of consent are recommended.

- The proposed haulage road in Kings Wetland should not damage remnant vegetation north of Kings Road.
- The landscape rehabilitation plan should include timeframes for completion and an ongoing monitoring program to assess the success of the rehabilitation. It is recommended that a time limit of six months from the end of use of the haul road be conditioned for the completion of all landscape rehabilitation.
- The Construction Heritage Management Plans should be submitted to the Heritage Council of NSW prior to finalisation.
- The Construction Heritage Management Plan should contain a commitment that the proponent will complete and implement a heritage interpretation strategy within 6 months of the issue of approval.
- The heritage interpretation strategy should include the following:
 - Discussion of the heritage significance of Patmore Swamp.
 - o Consultation plan that describes how interpretation will be developed in consultation with the local community and Bayside Council.

- A commitment that consultation will inform the content and nature or prosed interpretation.
- o Implementation schedule including timeframes for the installation of interpretation.
- The site protection measures should be implemented to minimise impacts to Patmore Swam

If you have any questions regarding the above advice, please contact Verena Mauldon, Senior Heritage Officer, at the Heritage Division on (02) 9895 6512 or at verena.mauldon@environment.nsw.gov.au.

Yours sincerely

Tim Smith OAM

Director Heritage Operations
Heritage Division
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As Delegate of the Heritage Council of NSW

3 December 2018