

6.6 Non-Aboriginal heritage

The non-Aboriginal heritage supplementary technical memorandum is provided in **Appendix F**, and a summary is provided below. This section should be read in conjunction with Section 7.6 of the EIS and the non-Aboriginal heritage assessment report provided in Appendix J of the EIS.

6.6.1 Assessment methodology

This assessment focuses on the changes in potential impacts associated with the amended project and involved:

- Desktop assessment carried out in January 2020 to identify known heritage items within the amended study area and to identify any newly listed heritage items within the EIS study area. This involved:
 - Searches of available registers and online databases
 - Review of previous heritage assessments and local heritage studies
 - Review of aerial imagery
- Impact assessment:
 - Level of impact – an assessment of the impact on each heritage item in the amended study area based on the scale, intensity, duration and frequency of the proposed works associated with the amended project
 - Statement of heritage impact – an assessment to identify what impact the amended project would have on specific heritage items prepared in accordance with the NSW Heritage Office (2002) Statements of Heritage Impact Guidelines.

No site investigations or assessments of significance were carried out, as no new non-Aboriginal heritage items were identified within the construction footprint.

The study area was updated for the assessment to accommodate the proposed changes. The amended non-Aboriginal heritage study area is shown on **Figure 6-34**.

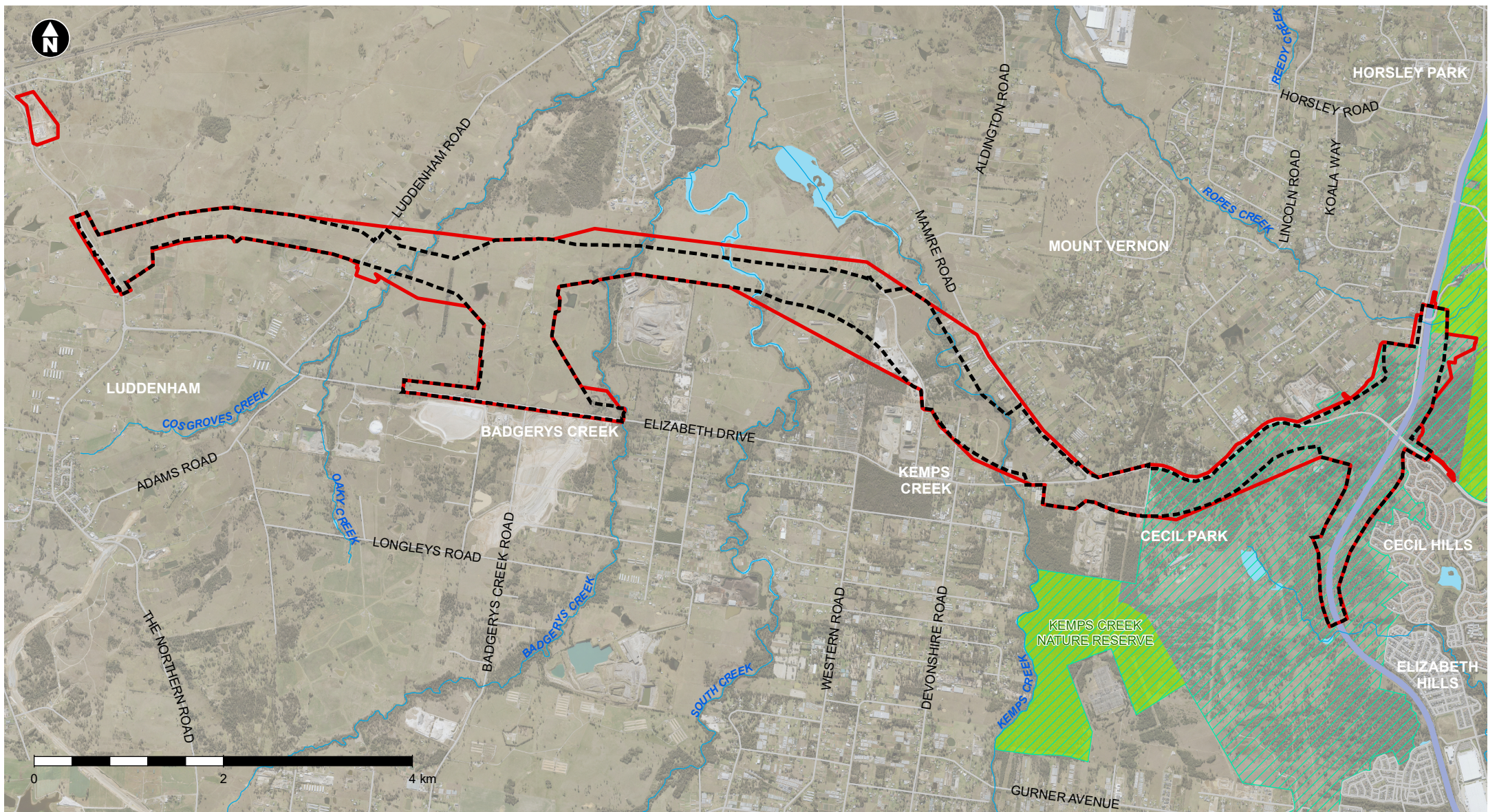
6.6.2 Existing environment

The existing environment is described in Section 7.6.3 of the EIS and is still applicable to the amended project.

The EIS identified nine heritage items of either local, State or potentially National heritage significance within or adjacent to the EIS study area (see **Figure 6-34**). The curtilage of two heritage items identified in the EIS extend further into the amended construction footprint, these are:

- Item 3: Luddenham Road Alignment, listed on the Penrith LEP (PLEP 843)
- Item 8: Cecil Park School, Post Office and School Church.

The desktop assessment and review of aerial imagery did not identify any additional areas of potential heritage items or areas of archaeological sensitivity within the amended study area.



- Study area as per the EIS
- Amended project study area
- Western Sydney Parklands
- NPWS estate / reserves
- Waterways
- Motorway
- Main roads

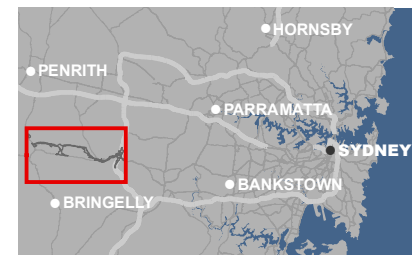


Figure 6-34 Amended non-Aboriginal heritage study area

6.6.3 Assessment of potential impacts

6.6.3.1 Construction impacts

As discussed in **Section 6.6.2**, nine heritage items of either local, State or potentially National heritage significance were identified within or adjacent to the EIS non-Aboriginal heritage study area (see Section 7.6.4 of the EIS). The amended project is not anticipated to have a greater impact on seven of these items. However, the desktop assessment identified that the curtilage of two of the nine heritage items (Item 3 and Item 8) also extend into the amended construction footprint.

An assessment of potential impacts on each of these items has therefore been carried out and is presented in **Table 6-35**. The assessment found that the amended project would not result in a greater impact overall on these items when compared to the project presented in the EIS. A full description and assessment of significance is included in **Appendix F**.

6.6.3.2 Operational impacts

Non-Aboriginal heritage impacts (either direct or indirect) associated with the operation of the amended project are not anticipated, as impacts are related to construction activities and associated ground disturbance. This is consistent with the EIS assessment (see Section 7.6.4 of the EIS).

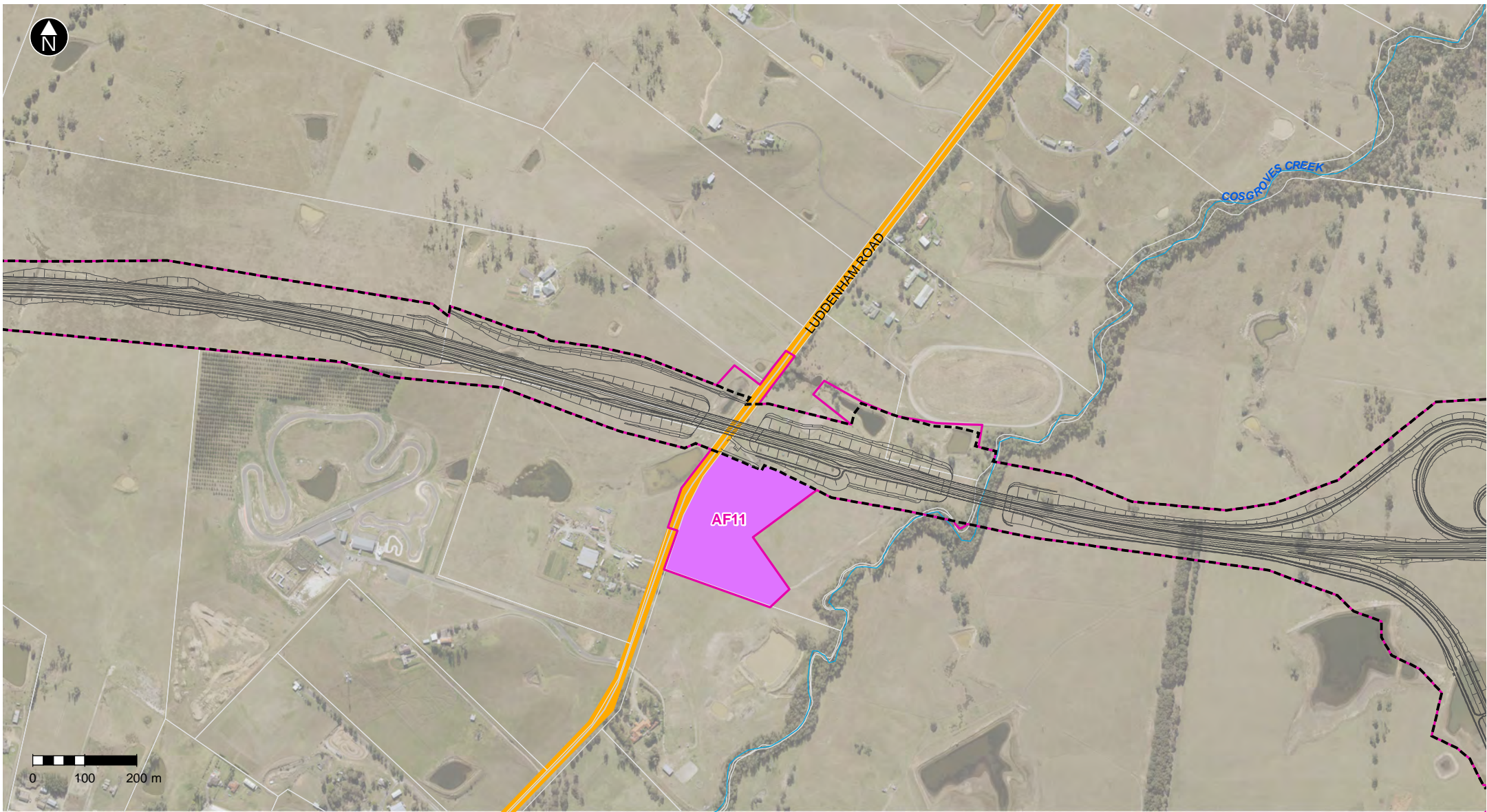
6.6.4 Cumulative impact

The cumulative non-Aboriginal heritage impacts would be likely to remain unchanged from the assessment carried out as part of the EIS and discussed in Section 7.6.5 of the EIS. The contribution of the project to cumulative impacts on non-Aboriginal heritage in the area is minor, considering the heritage impacts would be addressed and managed through the implementation of a range of environmental mitigation measures.

Table 6-35 Summary of potential impacts on heritage items associated with proposed changes

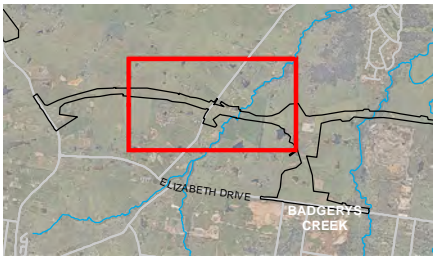
Heritage item	Assessment	Revised impact
Item 3: Luddenham Road Alignment (Penrith LEP 843)	<p>The proposed changes as part of the amended project that would potentially impact this heritage item include:</p> <ul style="list-style-type: none">• Construction of dual carriageway motorway with two lanes in each direction on a bridge over Luddenham Road• Provision of a construction ancillary facility adjacent to Luddenham Road• Relocation of existing overhead powerlines underground along Luddenham Road• New property access and potential drainage culverts to cater for this access. <p>The amended project includes a new construction ancillary facility adjacent to Luddenham Road, which extends around 65 metres further south into this heritage item, see Figure 6-35. Direct physical impacts on the heritage item relate to the installation of underground utilities, new property access points and culverts within the cadastral reserve.</p> <p>The overlap of an additional 65 metres of Luddenham Road as a result of the amended non-Aboriginal study area would not impact on the significance of the heritage item which relates to the road's historical significance as a late nineteenth century road.</p>	<p>Project as per EIS: negligible</p> <p>Amended project: negligible (no change)</p>

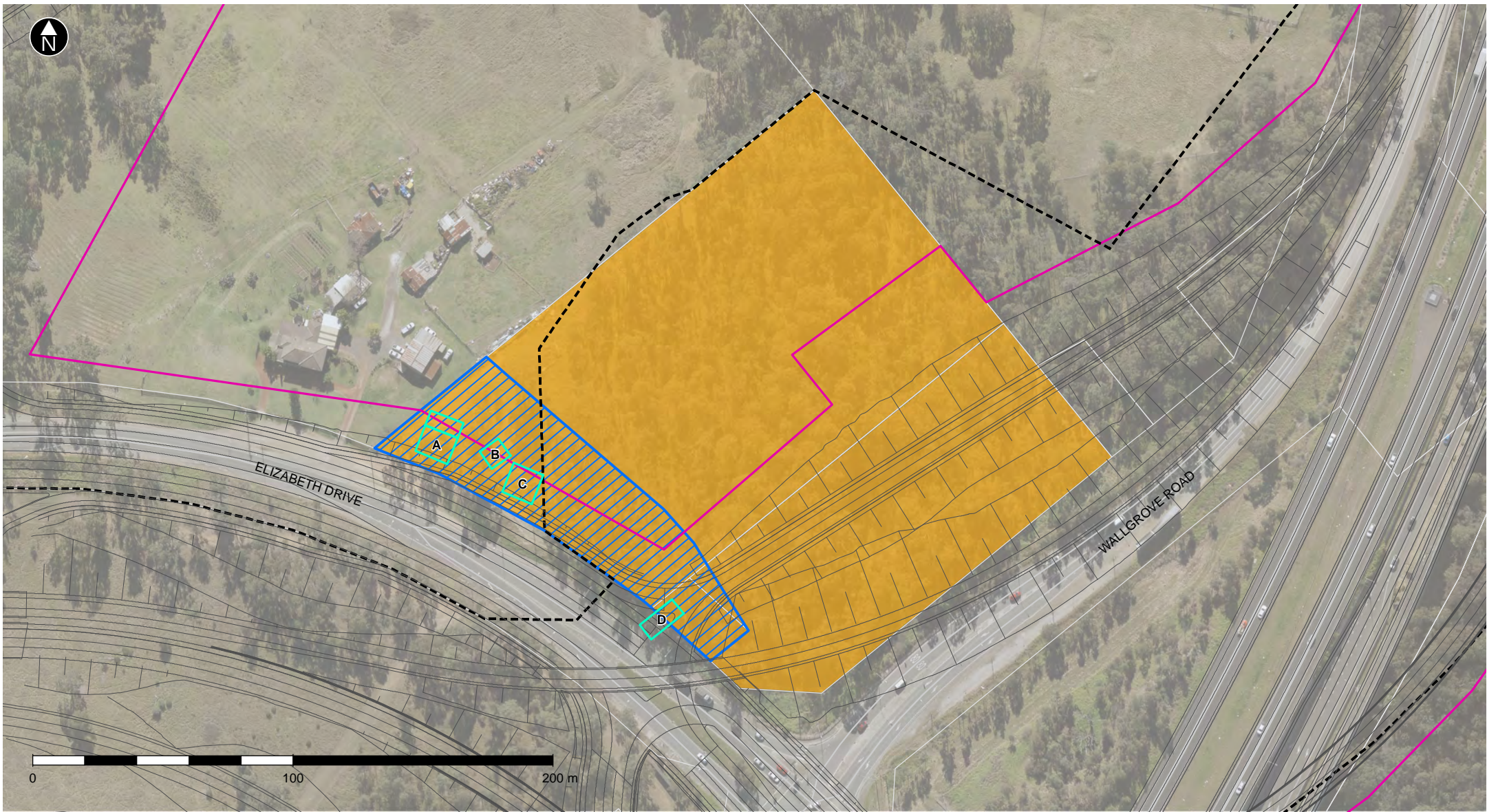
Heritage item	Assessment	Revised impact
Item 8: Cecil Park School, Post Office and School Church	<p>The amended construction footprint has been extended around 58 metres further north resulting in around 18 metres of the amended construction footprint overlapping with the southern curtilage of the heritage item (see Figure 6-36).</p> <p>The widening of Elizabeth Drive under the M7 Motorway and approaches and the amendment of the exit ramps from the M7 Motorway to the M12 Motorway overlap with the former Cecil Park School, Post Office and School Church (historical complex). The works outlined in the EIS would have a direct impact on archaeological deposits of the Cecil Park Post Office and the former Church of St Paul. However with the amended construction footprint extending further to the north, the archaeological deposits of the Cecil Park School would now be completely impacted, rather than partially impacted.</p> <p>The proposed works within the Cecil Park School, Park Post Office and School Church historical complex would still be of medium-large scale and moderate-high intensity, with the changes being permanent and irreversible.</p> <p>While permanent and irreversible impacts would occur through the destruction of the area of archaeological potential, undertaking archaeological salvage investigations would provide opportunity to obtain information about the archaeology and history of the site not available from other sources. An Archaeological Research Design (ARD) for archaeological salvage of Item 8: Cecil Park School, Post Office and School Church has been prepared and is presented in Attachment A of Appendix F.</p>	<p>Project as per EIS: major impact</p> <p>Amended project: major impact (no change)</p>



- The amended project
- The project construction footprint as per the EIS
- The amended project construction footprint
- Amended project ancillary facilities
- Luddenham Road Alignment
- Waterways

Figure 6-35 Luddenham Road Alignment (Penrith LEP 843) (Item 3) in relation to the amended project





- The project construction footprint as per the EIS
- The amended project construction footprint
- Archaeological potential
- Subject site boundary
- Cecil Park former building locations
- A Cecil Park School
- B Teacher's Residence
- C Cecil Park Post Office
- D School Church of St Paul

Figure 6-36 Cecil Park School, Post Office and Church (Item 8) in relation to the amended project



6.6.5 Environmental management measures

The environmental management measures identified in Section 7.6.6 of the EIS are considered appropriate to manage the non-Aboriginal heritage impacts associated with the amended project. However environmental management measure NAH09 has been revised, as shown in **Table 6-36**, to acknowledge the preparation of the archaeological research design and methodology for Item 8: Cecil Park School, Post Office and School Church (see Attachment A of **Appendix F**). Additional text is shown in **bold** and text that has been removed is shown in strikethrough text (~~example~~).

Table 6-36 Revised environmental management measures (non-Aboriginal heritage) (bold and strikethrough text shows change from EIS)

Impact	Reference	Environmental management measures	Responsibility	Timing
Cecil Park School, Post Office and Church Site (Item 8)	NAH09	<ul style="list-style-type: none"> TfNSW will liaise with local museums and/or historical societies to arrange a long-term secure artefact repository for the artefact assemblage. Once that arrangement has been made, DPC (Heritage) will be notified for their records. In the short term, TfNSW will provide secure short-term secure storage for the assemblage. Archaeological salvage excavations will be carried out for the Cecil Park School, Post Office and Church Site (Item 8) in accordance with the research design and methodology outlined in the <i>M12 Motorway: Former Cecil Park Historical Complex Historical Archaeological Salvage Research Design and Methodology</i> (Jacobs, 2020). An Archaeological Research Design (ARD) for archaeological salvage of the former historical complex will be prepared and implemented prior to construction commencing by a suitably qualified historical archaeologist who fulfils the Heritage Council's Excavation Director Criteria to conduct open area excavation of a locally significant archaeological site. The ARD will include a revised impact assessment, revised research questions and a methodology to ensure archaeological relics within the project construction footprint are adequately investigated in accordance with standard NSW archaeological practice. 	Contractor / TfNSW	Detailed design