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

Sent by e-mail to: [naomi.moss@planning.nsw.gov.au](mailto:naomi.moss@planning.nsw.gov.au)

Dear Ms Moss

**RE: SSI 17\_8256 – Sydney Metro - City & Southwest Project (Sydenham to Bankstown, T3 line upgrade) – Exhibition of Preferred Infrastructure Report**

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I respond to your invitation to comment on the Preferred Infrastructure Report (PIR) for the Sydney Metro (Sydenham to Bankstown) project.

On 11 October 2017, the Heritage Council of NSW submitted a response to the Environmental Impact Statement (EIS). The response identified that the project has potential to have a major-to-moderate impact on ten heritage listed railway stations. This included direct physical impacts on:

- three State Heritage Register (SHR) listed railway station precincts: Marrickville (SHR No. 01186), Canterbury (SHR No. 01109) and Belmore (SHR No. 01081); and,
- seven railway stations listed on Local Environmental Plans and Section 170 heritage & conservation registers.

We have reviewed the Response to Submissions documentation, in particular:

- Sydney Metro: Sydenham to Bankstown, Submissions and Preferred Infrastructure Report, June 2018.
- Appendix A – Issue categories and where to find responses to issues raised in submissions.
- Appendix B – Preferred project description.
- Appendix F – Non-Aboriginal heritage assessment.
- Appendix I – Archaeological Assessment and Research Design Report.

Key issues of community concern identified in the 563 submissions to the EIS included impacts to heritage-listed stations and local character. The revised PIR design for Metro has generally reduced heritage impacts. The main changes to the project's scope are:

- retention and re-purposing of heritage-listed station buildings, rather than construction of new operational facilities and amenities blocks
- re-levelling of station platforms and installation of mechanical gap fillers, rather than demolishing and straightening heritage platforms
- reuse of existing station entrances and concourses, rather than constructing new overhead concourses (to the exception of Dulwich Hill Station where a new overhead connection to the light rail stop is proposed for interchange reasons).

In response to the design changes, the I note that the non-Aboriginal heritage mitigation measures have been modified, as outlined in Section 16.1 (Table 16.1) of the PIR, as NAH1 to NAH22.

### **Built heritage**

The PIR proposes the reuse of the station buildings to accommodate Metro operational facilities. This will potentially result in additional heritage impacts to these elements. The proposed mitigation measures in the PIR to address these concerns include:

- the development of an adaptive reuse strategy for retained items (NAH5)
- controls for repurposing significant station buildings (NAH8)
- management and mitigation measures identified to minimise direct and indirect impacts to heritage items including further consideration of detailed design (NAH1 to NAH4).

These measures are considered acceptable. It is recommended that the following be included in the Conditions of Approval:

- The proposed mitigation and management measures outlined in Section 16.1 of the PIR and Appendix F - Non-Aboriginal heritage assessment, must be implemented. The condition should state that detailed design must comply with the mitigation measures.
- Detailed design and installation of platform screens and mechanical gap fillers must be developed to minimise impact to significant platform profiles as much as possible.
- The heritage sub-plan of the Construction Environmental Management Plan must include a transition management strategy to minimise the impacts of the transfer from Sydney Trains to Metro operations on significant elements and buildings. The strategy should ensure that impacts to significant fabric are minimised during operational changes, including staging infrastructure installation. The strategy must also prescribe utilising the spaces vacated by Sydney Trains for public amenity, such as for waiting rooms, where possible.
- The commitment to interpretation for this project is addressed in the PIR as NAH6. A revised commitment should be adopted as a condition of consent to include results of the archaeological program undertaken for the project.

### **Non-Aboriginal archaeology**

Previous Heritage Council comments on the project indicated the need for an archaeological assessment and research design to be provided for the management of impacts to historic archaeology along the project route, which is addressed in the PIR report. This document provides an adequate assessment of archaeological potential and significance of archaeological information within the project area. The following comments are made on the archaeological methods proposed in the PIR:

- The Archaeological Research Design (ARD) has not been updated since the project has been revised, which reduces the relevance of the PIR. The key issue of impact to archaeological information is thus inadequately assessed at this stage. An updated report incorporating the preferred infrastructure is required.
- The ARD does not provide enough documentation on how the archaeological resource will be managed, leaving detail to Archaeological Work Method Statements (AWMS) to be prepared once construction impacts are known. This does not allow the Heritage Council to properly review the archaeological methods for the project. These management measures should be added to the ARD based on the known heritage constraints, or alternatively, a commitment should be made that the Heritage Council of NSW or its delegate be consulted during the preparation of the AWMS. The AWMS should include, provision for artefact sampling to focus the archaeological program, where appropriate.
- The research questions provided are not sufficiently specific for each site. They should be updated to present key phases and expected archaeological remains at each project area. Additionally, this large-scale project presents an opportunity to compare sites across the

project footprint. This will guide the provision of archaeological themes which will also be relevant for interpretation.

- The project is expected to require archaeological monitoring and excavation as archaeological relics are likely. To ensure artefacts are appropriately collected, analysed and stored, additional management measures are required for the collection of artefacts on site, the discard of artefacts on-site and off-site, and methods for long-term storage and re-use. It is also reiterated that archaeological information should be included in the interpretation of the project and this should be made clear in commitment NAH6.
- No excavation team has been provided, though the document does acknowledge the need to have Excavation Directors (EDs) who are suitably qualified to manage State and locally-significant sites. This information should be prepared and communicated to the Heritage Council for comment.

It is recommended that the following be included in the Conditions of Approval:

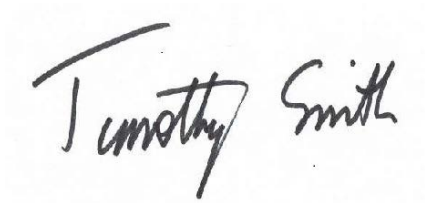
- **Historical Archaeological Management Documents:** The Archaeological Assessment Research Design Report (AARD) listed in the A1 documents shall be implemented. Final Archaeological Method Statements (AMSs) must be prepared in consultation with the Heritage Council of NSW (or its delegate) before commencement of archaeological excavation works. The AMS shall be submitted for the approval of the Department of Planning and Environment. The final methodology must include:
  - a) detailed site-specific research to inform the proposed methodology and include relevant research questions to guide the archaeological investigation. The AMS must also include a clear assessment of impacts to archaeology
  - b) an artefact storage and discard protocol to ensure appropriate management of artefacts during and after the project. This should include a protocol for retention and discard policies. It should also include provision for artefact sampling to focus the archaeological program, where appropriate
  - c) include a sampling strategy for the site, where appropriate, to focus the archaeological investigation and adequately address the research questions
  - d) The AMS must identify the nominated archaeological team proposed to manage the works including the nominated Excavation Director.
- **Historical Archaeological Excavation Directors:** Before excavation of archaeological sites, the Proponent must nominate a suitably qualified Excavation Director (ED) to direct the historical archaeological program during the project. The nominated Excavation Director nominated must satisfy the significance level and excavation type for the site against the *Heritage Council of NSW Excavation Director Criteria 2011*. The Excavation Director shall ensure the provisions of the approved AARD and mitigation measures developed in the approved AMS are implemented for the project.
- **Archaeological Reporting:** A final archaeological excavation report shall be prepared within one (1) year of the completion of archaeological excavation for each stage of the project. This report shall include relevant comparative analysis and at a minimum address the research questions raised in the ARD and the AWMSs for the project. It should also reference the final artefact storage location and include a summary of ongoing conservation and protection in perpetuity.

A final consolidated archaeological report for the project must be submitted to the Heritage Council of NSW within one (1) year of the completion of all archaeological excavation for the approval. The report must include consolidated project reports and information for the entire historical archaeological program relating to this SSI approval. This report must be provided to the Department of Planning and Environment, the Heritage Council and to the relevant Council Local Studies units.

We reiterate the importance and value of continuing to involve the Heritage Council as the project's detail design develops, to understand and ensure that design options considered will have minimal archaeology and heritage impacts.

If you have any questions regarding the above matter please contact Alexander Timms, Senior Heritage Officer at the Heritage Division, Office of Environment and Heritage, on (02) 8837 6067 or at [alexander.timms@environment.nsw.gov.au](mailto:alexander.timms@environment.nsw.gov.au)

Yours sincerely

A handwritten signature in black ink that reads "Timothy Smith". The signature is written in a cursive style with a large, sweeping initial 'T'.

**Tim Smith OAM**  
Director Operations  
Heritage Division, Office of Environment & Heritage  
**As Delegate of the Heritage Council of NSW**  
11 July 2018