



Heritage Council
of New South Wales

3 Marist Place
Parramatta NSW 2150

Locked Bag 5020
Parramatta NSW 2124
DX 8225 PARRAMATTA

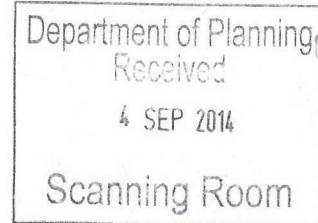
Telephone: 61 2 9873 8500
Facsimile: 61 2 9873 8599

heritage@heritage.nsw.gov.au
www.heritage.nsw.gov.au



Mr Alexander Scott
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Contact: Lily Chu
Phone: (02) 9873 8595
Email: lily.chu@environment.nsw.gov.au
Job no. DOC14/161596
File no. SF14/14803
Your ref. SSI-6148



Dear Mr Scott

WestConnex M4 widening – Notice of Exhibition

Thankyou for your letter dated 11 August 2014 inviting comments and advice on recommended conditions of approval for the WestConnex M4 widening project.

The Heritage Division, Office of Environment and Heritage (OEH), on behalf of the Heritage Council of NSW, has reviewed the documentation associated with the Environmental Impact Statement (EIS). Particular attention had been made to the 'Non-Indigenous Heritage Assessment and Statement of Heritage Impacts' (SoHI) prepared by Artefact Heritage dated July 2014.

Please note that the following comments are provided in relation to non-Aboriginal heritage only, whilst comments on Aboriginal Heritage are provided by a separate section of OEH.

The SoHI identifies that one State Heritage Register item is located in the vicinity of the site, being Electricity substation No. 167 (SHR no. 01790). This substation is located on the north-east corner of Parramatta Road and Silverwater Road, Auburn, near the Silverwater Road entry and exit ramps. There is limited work proposed to the M4 in this location, thus it is expected that there will be no adverse heritage impact on this substation.

The SoHI also identifies 22 heritage items of local significance located within the vicinity. It is noted that:

- The construction of a new bridge over the Duck River would involve the removal of a small area of mangrove to the Lower Duck River Wetlands, listed on the *Auburn Local Environmental Plan 2010*;
- The construction of the on-ramp at Hill Road could impact on a group of remnant plantings, listed on the *Auburn Local Environmental Plan 2010*, however is likely to only affect regrowth;
- The works could potentially involve vibration impacts to eleven heritage listed residences; and
- The location of a site compound near Homebush Bay Drive could have a visual impact on the Welfare Street Conservation Area.

The SoHI proposes six recommendations to mitigate the heritage impacts of the proposal being:

1. Design and construction of the new bridge over Duck River to minimise impact on the listed wetlands.

2. Design and construction of the on-ramp at Hill Road to minimise impacts to the heritage listed mature stand of trees and replanting of vegetation that is impacted.
3. Implementation of measures outlined in the Noise and Vibration Assessments to limit potential damage of buildings.
4. Installation of temporary screening measures to reduce the visual impact of site compounds adjacent to Conservation Areas.
5. Notification to Parramatta City Council of the works at Duck River as they are located within Archaeological Management Unit 2698.
6. Following the Roads and Maritime Services guidelines if unexpected archaeological deposits are found during construction.

Recommendations 1-5 above are supported by OEH, however recommendation 6 is not supported at this stage. The archaeological assessment included at section 6.0 of the SoHI does not contain the level of detail required as per the Heritage Council's Archaeological Assessment guidelines. Furthermore, the Director's General's Requirements outlines an appropriate archaeological assessment methodology and research design which have not been submitted as part of the EIS. At this stage, there has been insufficient archaeological assessment and therefore the OEH does not believe that you have demonstrated that the project will not have an impact on potential historical archaeological remains.

It is recommended that the appropriate archaeological assessments be carried out and submitted to the OEH, prior to the determination of the application so that appropriate conditions can be recommended on the approval.

Should the Department of Planning and Environment wish to determine the application now, it is recommended the following conditions be included:

- Recommendations 1 to 5 of the 'Non-Indigenous Heritage Assessment and Statement of Heritage Impacts' (SoHI) prepared by Artefact Heritage dated July 2014 must be implemented.
- The applicant shall prepare a full archaeological assessment including an archaeological methodology and research design (if appropriate), in accordance with the 1996 Heritage Council Archaeological Assessment Guidelines and submit to the Heritage Division of OEH for comment and endorsement.
- Where substantial intact archaeological relics of State or local significance are discovered during excavation, work must cease in the affected area and the Heritage Council must be notified in writing in accordance with section 146 of the *Heritage Act 1977*.

Please contact Lily Chu, Heritage Officer of OEH at lily.chu@environment.nsw.gov.au or on (02) 9873 8595 for any enquiries regarding this matter.

Yours sincerely



Rochelle Johnston
Manager, Conservation
Heritage Division
Office of Environment and Heritage
As Delegate of the Heritage Council of NSW
02 September 2014