

Ms Belinda Scott
Senior Planning Officer
Transport Assessments
Department of Planning, Industry & Environment
320 Pitt Street
Sydney NSW 2000

By email: Belinda.Scott@planning.nsw.gov.au

Dear Ms Scott

Notice of Exhibition of application for Sydney Gateway Road Project (SSI 9737) – Comments on Environmental Impact Statement

Thank you for inviting the Heritage Council of NSW to provide comment and recommended conditions of approval for the Sydney Gateway Road Project. I am responding as the delegate of the Heritage Council.

I understand that the project would connect Sydney Airport Terminal 1 (the International Terminal) and Terminals 2/3 (the Domestic Terminals) with each other and with the Sydney motorway network via St Peters interchange. It would also facilitate the movement of traffic towards Port Botany via General Holmes Drive. The proposed project would provide three main routes for traffic:

- Between the Sydney motorway network and Terminal 1, and towards the M5 motorway and the Princes Highway;
- Between the Sydney motorway network and Terminals 2/3, and towards General Holmes Drive, Port Botany and Southern Cross Drive; and
- Between Terminal 1 and Terminals 2/3.

The project also provides improved access to Sydney Airport land located on both sides of Alexandra Canal and across the Botany Rail Line.

The proposed SSI 9737 affects the State Heritage Register (SHR) listed item **Alexandra Canal (SHR No. 01621)** which is a built waterway following the former course of Sheas Creek in south-eastern Sydney and runs north-west from its intersection with the Cooks River and terminates 200 metres south of Huntley Street in Alexandria. **Alexandra Canal** is of high historic, aesthetic and technical/research significance. Historically, it is a rare example of a 19th century navigational canal construction in Australia, being one of only two purpose-built canals in the State, with one other known example in Victoria. It has the ability to demonstrate the NSW Government's initiative to create water transport as a means of developing an industrial complex in the Alexandria and Botany areas and exploiting the use of unemployed labour to achieve its scheme.

A review of the Environmental Impact Statement/Preliminary Draft Major Development Plan documentation for SSI 9737 has been undertaken, in particular:

- Section 17 (Non-Aboriginal heritage); Section 18 (Aboriginal heritage); Section 21 (Landscape character and visual amenity)
- Technical Working Paper 9: Statement of Heritage Impact

- Technical Working Paper 13: Urban Design, Landscape Character and Visual Impact Assessment

Based upon this review, the following comments are provided.

GENERAL COMMENTS

As there are local heritage items at the project site and in the vicinity, advice should also be sought from the relevant local councils.

RECOMMENDED CONDITIONS

If approved, the following conditions are recommended.

- Works affecting Alexandra Canal must be guided by the Alexandra Canal **Conservation Management Plan**, prepared by the Government Architect's Office, NSW Department of Commerce, 2004 (endorsed by Heritage Council of NSW on 4 August 2004).
- Suitably qualified and experienced **heritage specialists** must be integrally involved in the detailed design development of the proposed project's components to avoid, minimise or mitigate heritage impacts on Aboriginal, Non-Aboriginal, archaeological, landscape and urban design values along Alexandra Canal. The heritage specialists should guide the compliance with the Alexandra Canal Conservation Management Plan policies.
- The **design of the bridges** over Alexandra Canal must be sympathetic to the industrial and landscape character of the canal and surrounds. The bridges must be designed to avoid, minimise or mitigate physical and visual impacts on the canal and surrounds. The bridge designs must integrate heritage interpretation. The Heritage Council of NSW (or its delegate) should be consulted at appropriate stages and their comments taken into consideration during the development and refinement of the bridge designs.
- The **design of drainage outlets** along Alexandra Canal must be sympathetic to the industrial and landscape character of the canal and its significant fabric. The drainage outlets must be designed to avoid, minimise or mitigate physical and visual impacts on the canal and surrounds. The Heritage Council of NSW (or its delegate) should be consulted at appropriate stages and their comments taken into consideration during the development and refinement of the drainage outlets design.
- A **Heritage Management Plan** would assist positive outcomes and would be best prepared as part of the **Construction Environmental Management Plan** in consultation with appropriate stakeholders, including the Heritage Council of NSW (or its delegate). Specific measures could be identified in consultation with the nominated heritage consultant for the project. The objectives and strategies of the subplan in relation to built heritage should include, but not be limited to, the following:
 - Avoid, minimise or mitigate impacts on Alexandra Canal and its surrounds.
 - Details of management measures to be implemented to avoid or minimise direct and indirect impacts on Alexandra Canal and its surrounds (including archival recordings and/or measures to protect affected sites during construction works in the vicinity).
 - Procedures for the post-construction reinstatement of areas of heritage value that would be temporarily impacted by construction.
 - Heritage monitoring and auditing requirements.

- Management guidelines that are consistent with NSW heritage guidelines and the Airport Heritage Management Plan.
- We support the preparation of an **Urban Design and Landscape Plan** to include **heritage interpretation**. Aboriginal and Non-Aboriginal heritage values would be integrated in the heritage interpretation strategy (subplan) and be interpreted holistically. A interpretation framework should be prepared in accordance with the *Interpreting Heritage Places and Items Guidelines* (NSW Heritage Office, 2005). We would recommend the Heritage Council of NSW (or its delegate) and the Aboriginal Cultural Heritage Advisory Committee (ACHAC) being consulted at appropriate stages, and their comments taken into consideration during the development and refinement of the heritage interpretation.
- We would strongly support the Proponent engaging a suitably qualified and experienced specialist to prepare an **Archival Recording** of Alexandra Canal and its adjacent surrounds that are affected by the proposed works, prior to the commencement of any works. The photographic digital recording could be supplemented with a video flyover above and along the canal and 3D imaging as a digital record.

Where appropriate, we would recommend the recording of the site and canal “before, during and after any major changes and use this record in the site’s interpretation”, as per Policy 82 in the Alexandra Canal Conservation Management Plan.

Measured drawings of fabric/areas/elements subject to major alterations (for example, embankments walls where drainage outlets are proposed to be installed) should be prepared, as per Policy 13 in the Alexandra Canal Conservation Management Plan.

The archival recording to be prepared in accordance with 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).

Within 12 months of completing the archival recording, the Proponent should be required to submit the **Archival Recording** to Heritage NSW and relevant local councils.

- Where significant fabric is to be removed from Alexandra Canal, we recommend that it be **salvaged, securely stored and reused** for repair and maintenance of other sections of the canal, as per policies in the Conservation Management Plan. It can also be used as part of heritage interpretation scheme.
- The potential for **vibration impacts** on Alexandra Canal must be formally assessed during the detailed construction planning. Specific measures to mitigate any indicated impacts on Alexandra Canal must be included in relevant management plans for the project.
- We strongly suggest that where works are to take place within 10 metres of the State Heritage Register-listed Alexandra Canal, **heritage protection zones and protective barriers** be established around Alexandra Canal and its adjacent surrounds, prior to and during the construction program.
- Where State significant archaeology and substantially intact archaeological resources would be affected by the project, the impacts should be mitigated through the following measures.

An **Historical Archaeological Assessment and Research Design and Excavation Methodology** to guide the approach to any archaeological excavation should be prepared by a suitably qualified and experienced excavation director who fulfils the Heritage Council’s Excavation Director Criteria.

- The **Historical Archaeological Assessment and Research Design and Excavation Methodology** be submitted to the Heritage Council of NSW (or its delegate) for review and

comment prior to finalisation. The Historical Archaeological Research Design and Excavation Methodology must:

- (a) be consistent with the NSW Heritage Council's *Archaeological Assessments Guideline* (1996) or as updated;
 - (b) provide for the detailed analysis of any heritage items discovered during the investigations;
 - (c) include management options for discovered heritage items, whether known or unexpected finds (including options for avoidance, salvage, relocation and display);
 - (d) for unexpected finds that are determined to be relics, set out the assessment process that will determine an appropriate archaeological response to managing their significance;
 - (e) include procedures for notifying the Heritage Council of NSW (or its delegate) and Secretary of any relic findings; and
 - (f) if the findings of the investigations are significant, provide for the preparation and implementation of a **Heritage Interpretation Plan**.
- Where excavation works are required in the vicinity of potential archaeological sites, the Excavation Director be consulted to advise on how the works are to be managed and any archaeological impact minimised. The Excavation Director be given the authority to advise on the duration and extent of oversight required during excavation.
 - Works within the vicinity of the find not recommence until the relevant requirements of the **Historical Archaeological Assessment and Research Design and Excavation Methodology** or advice on unexpected finds from the Excavation Director have been met.
 - The Proponent prepare an **Archaeological Excavation Report** containing the findings of any excavations, including artefact analysis and the identification of a final repository of any finds. The report be submitted to the Secretary within 12 months of completing all archaeological investigations. The **Archaeological Excavation Report** must also be submitted to the Heritage Council of NSW, relevant local libraries and local historical societies in the respective local government areas. A copy of the **Archaeological Excavation Report** be retained with the relics at all times.
 - Preparation of final reporting to include the following:
 - (a) An executive summary of the archaeological programme;
 - (b) Due credit to the client paying for the excavation, on the title page;
 - (c) An accurate site location and site plan (with scale and north arrow);
 - (d) Historical research, references, and bibliography;
 - (e) Detailed information on the excavation including the aim, the context for the excavation, procedures, treatment of artefacts (cleaning, conserving, sorting, cataloguing, labelling, scale photographs and/or drawings, location of repository) and analysis of the information retrieved;
 - (f) Nominated repository for the items;
 - (g) Detailed response to research questions (at minimum those stated in the Department of Planning, Industry and Environment approved Research Design);
 - (h) Conclusions from the archaeological programme. This information must include a reassessment of the site's heritage significance, statement(s) on how archaeological

investigations at this site have contributed to the community's understanding of the Site and other Comparative Site Types and recommendations for the future management of the site;

- (i) Details of how this information about the excavations have been publicly disseminated (for example, include copies of press releases, public brochures and information signs produced to explain the archaeological significance of the sites).
- We recommend the Proponent be required to ensure that if unexpected archaeological deposits or relics not identified and considered in the supporting documents are discovered, work must cease in the affected area(s) and the Heritage Council of NSW must be notified. Additional assessment and approval may be required prior to works continuing in the affected area(s) based on the nature of the discovery.
- An **Unexpected Heritage Finds Procedure** must be prepared:
 - (a) to manage unexpected heritage finds in accordance with any guidelines and standards prepared by the Heritage Council of NSW or Heritage NSW; and
 - (b) by a suitably qualified and experienced heritage specialist.

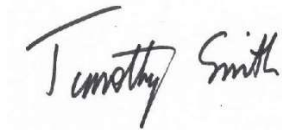
The Procedure must be included in the **Construction Cultural Heritage Management Plan**.

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.

- Should any Aboriginal 'objects' be uncovered by the work, excavation or disturbance of the area stop immediately and the Chief Executive is to be notified in accordance with Section 89A of the *National Parks and Wildlife Act 1974* (as amended). Works affecting Aboriginal 'objects' on the site must not continue until Heritage NSW has been informed. Aboriginal 'objects' must be managed in accordance with the *National Parks and Wildlife Act 1974*.

If you have any questions regarding our comments on SSI 9737 (Sydney Gateway Road Project), please contact Hendry Wan, Senior Heritage Officer - Major Projects at Heritage NSW, Department of Premier and Cabinet, on (02) 8837 6090 or at Hendry.Wan@environment.nsw.gov.au

Yours sincerely



Tim Smith OAM

Director, Heritage Operations

Heritage NSW

Department of Premier and Cabinet

As Delegate of the Heritage Council of NSW

20 December 2019