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Ms Naomi Moss
Senior Planning
Department of Planning and Environment
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SYDNEY NSW 2001

NOTE: Redacted sections of this document contained issues not relevant to the Submissions and Preferred Infrastructure Report.

Via Email to: naomi.moss@planning.nsw.gov.au

Dear Ms Moss

WestConnex M4-M5 Link (SSI 7485) – Comments on Response to Submissions

I refer to your email received on 5 February 2018 inviting the Heritage Council of NSW to provide comments on the Response to Submissions (RTS) for the WestConnex M4-M5 Link project. I am responding as the Heritage Council's delegate.

On 16 October 2017, the Heritage Council provided comment on the Environmental Impact Statement (EIS), and recommended conditions of consent for the project. It is noted that the RTS has addressed each comment. Based on a review of these responses, the following comments are provided.

Rozelle Rail Yards

It is understood that as part of separate works undertaken by Roads and Maritime Services (RMS) at the Rozelle Rail Yards, key features of rail-related infrastructure including the Darling Harbour Goods line tracks, overhead rail gantries and the lighting tower have been removed and stored for potential reuse. However, it is unclear where these elements have been relocated to, and whether they have been appropriately catalogued and stored. Details of their storage must be provided to the Heritage Council or its delegate.

It is noted the potential reuse of the salvaged rail related infrastructure will be identified within an Interpretation Strategy to be developed as part of the project. It is recommended that the Strategy is developed by an interpretation specialist in consultation with the Heritage Council. The Strategy must also be developed in conjunction with further detailed design of the project to ensure it is appropriately integrated into the overall design.

It is noted that the Interpretation Strategy will also inform the development of the Urban Design and Landscape Plan (UDLP). The UDLP must consider the former industrial landscape of the Rozelle Rail Yards and address it in terms of any proposed new landscape/beautification scheme.

Southern Penstock

It is understood management measures are proposed to be implemented to protect the southern penstock from damage during construction works. However, until further detailed design is undertaken, the proximity of construction works to this component has not been finalised. In the absence of a stipulated exclusion zone, the Heritage Council's previous

recommendation of a 10 metre exclusion zone around the item must be provided to avoid any potential adverse heritage impacts.

Cadden Le Messurier/ 1878 Former Hotel, 78 Lilyfield Road

The late nineteenth century Cadden Le Messurier and the 1878 Former Hotel have been identified as items of heritage significance (SREP No 26). These items also contribute to the streetscape of Lilyfield Road. Their demolition is not supported.

The response notes the demolition of these two heritage listed items is necessary due to proximity of tunnelling immediately adjacent to the buildings, and the need to locate underground services in this area.

However, it is understood detail design development is still being undertaken. It is therefore premature to give approval to demolish these significant heritage items prior to adequate detail design work being undertaken. It is therefore recommended that the project footprint is realigned during detailed design stage to exclude these properties from the works area.

Ventilation Outlets Rozelle Rail Yards

It is understood the final design of the three ventilation outlets proposed to be located as part of the M03 facility within the Rozelle Rail Yards has not been finalised and that further design refinement is to be undertaken at detailed design stage, including the investigation of measures to reduce the height, bulk, scale and enhance the landscape setting of ventilation outlets.

It is recommended that the design of the ventilation facility (M03) including the ventilation outlets is undertaken in consultation with the Heritage Council or its delegate, to ensure the design of the ventilation outlets are sympathetic to the surrounding character and setting, including the Hornsey Street, Easton Park and Brenan Estate Conservation Areas. Consideration must also be given to ensure the views to the SHR listed White Bay Power Station are not adversely impacted.

Demolition of properties within Iron Cove Link

The proposed demolition of six buildings along Victoria Road, identified as being of potential local heritage significance, is not supported as it would diminish the character of the area. Further, we are concerned that adequate assessment of other potential heritage items has not been undertaken.

The response notes the property at 244 Victoria Road Rozelle was not accessed for its potential heritage significance due to it being obscured by tall fencing and vegetation. This was only raised in response to an Inner West Council comment. It is recommended a comprehensive assessment is undertaken to ensure all items of potential heritage significance are identified, then an assessment be undertaken of the potential impacts of the proposed works.

Should approval for demolition be granted, the Heritage Salvage Strategy proposed as part of the works, must be prepared prior to demolition works commencing. It must be developed in consultation with a heritage consultant and identify appropriate salvage processes including storage procedures on site. Further, workers on site must be made aware of identified items to be recovered to ensure these elements are safeguarded for reuse/relocation.

Ventilation Outlet Iron Cove Link

It is understood the design of the ventilation outlet at the Iron Cove link has yet to be finalised and will be subject to further design refinement including to reduce the height, bulk, scale and enhance the landscape setting of ventilation outlet. This must be undertaken in

consultation with the Heritage Council or its delegate, to ensure its design and placement gives consideration to the surrounding character and setting including the adjacent Iron Cove Heritage Conservation Area.

Former Bank of NSW building

It is understood that the former Bank of NSW building is not listed on any current statutory heritage list. However, it has been identified as having potential local heritage significance. It is also identified as being rare in the context of Parramatta Road as an example of a purpose built inter war commercial building. The proposed demolition of this Inter-War commercial building will result in the significant loss of a landmark building. It will also adversely impact the character of the streetscape. Therefore, demolition is not supported.

The response does not adequately justify why the temporary construction zone cannot be revised to exclude this building from the construction site. It should be noted the footprint of the building is relatively small in comparison to the overall tunnelling site. Further, the response does not justify why the demolition of this building for a short-term activity is appropriate.

As the Heritage Council's concerns have not been sufficiently addressed, it is still recommended the project footprint is amended to retain the former Bank of NSW building.

79 Pyrmont Bridge Road

The storage warehouse building at 79 Pyrmont Bridge Road, contributes to the industrial streetscape along Pyrmont Bridge Road. It is understood, due to the large footprint of the building, that the full retention of this building will limit the temporary construction site. It is therefore recommended that a significant portion of the building fronting the street of the storage warehouse building be retained to ensure impact to the character of the streetscape is minimised.

Haberfield/ Ashfield

It is acknowledged that the two additional construction ancillary facilities (Parramatta Road East civil and tunnel site (PRE), and Parramatta Road West civil and tunnel site (PRW)), are located adjacent and not within the Haberfield Conservation Area. However, the proposed demolition will expand the construction footprint of the project, further adversely impacting on the already heavily impacted Haberfield Conservation Area and the area more generally.

The RTS does not adequately justify why the further degradation of the Haberfield area, through additional demolition is required. It also does not address the cumulative impact of expansion of the construction footprint within the Haberfield area.

It is therefore recommended that the already existing construction sites be reused for the purposes of tunnelling support during construction and the additional construction ancillary facilities (PRE/PRW) be removed from the scope of works.

General Comments

It is understood that detail of the design and construction approach presented in the EIS and RTS is indicative only and will be subject to further detailed design development and construction planning. The Heritage Council reiterates its advice for the further mitigation of the proposed adverse heritage impacts during the project's detailed design development, with ongoing input from heritage specialists and the Heritage Council.

In addition, the design and requirements for the associated motorway infrastructure, such as electronic toll gantries, traffic lights, signage etc are still to be developed. These have the potential to have visual impacts on the setting of heritage items and the character of the Heritage Conservation areas within the project corridor. We reiterate that input from heritage

specialists and the Heritage Council should be sought during any further design development so that any potential impacts can be minimised.

Historical Archaeology

The response to the EIS provided that additional archaeological investigation would be required to better inform the significance and rarity of the archaeology at HAMUs 3, 5, 6, 9, 10 and 11. The Heritage Division recommended further archaeological investigation be undertaken involving archaeological testing prior to works to confirm the location, integrity and extent of archaeological resources within the site. Additionally, the EIS recognised HAMU 7 – White Bay Power Station as having potential to contain archaeological resources. Archaeological investigation including test excavation was recommended by the Heritage Division to manage relics of local significance. It was recommended that areas of State significant archaeology and areas of substantially intact archaeological evidence be avoided where feasible as part of the delivery of the project.

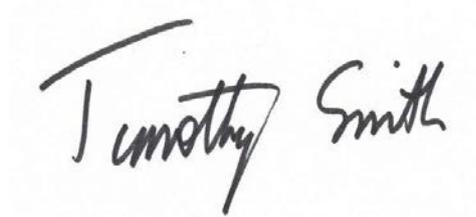
The RtS provided the following response to the recommendations made by the Heritage Division:

- Section C20.2.1 of the RtS indicated that deep excavation works may be required at HAMU 3, which may potentially result in major impacts to potential historical archaeological resources of local significance. Activities associated with surface earthworks, drainage and finishing works would have localised impacts resulting in moderate to minor impact on potential historical archaeological resources. The respondent indicated a HARD would be prepared to establish the significance of the findings. It is further noted that a suitably qualified Excavation Director would be engaged to oversee the archaeological excavation.
- The area identified as HAMU 5 has a low potential for archaeological remains as the subject to significant disturbance, where it is not likely to meet the threshold for local significance. The respondent noted that it is unlikely that the proposed works would have an impact on significant archaeological remains. The assessment indicated that no further archaeological investigation is required. The Heritage Division note that the assessment of potential and significance of archaeological resources within HAMU 5 were not clearly established. The RtS does not respond to the recommendations of additional archaeological investigation outlined in the EIS.
- Works proposed within the area of HAMU 6 require deep excavation in areas of potential yet to be established. It is noted that the works would have a moderate to minor impact on potential remains, dependant on the extent and integrity of the remains. The RtS notes a HARD would be prepared prior to start of proposed works within HAMU 6.
- The RtS indicated that that the extent and location of the works in HAMU 7 have yet to be determined. The Heritage Division reiterate the proposed mitigation strategies outlined in our previous comments in which archaeological investigation followed by testing within the area of proposed excavation would be undertaken to appropriately manage the archaeological resources. Additionally, areas of State significant archaeology and areas of substantially intact archaeological evidence shall be avoided where feasible as part of the delivery of the project.
- The RtS does not address the recommendations provided to the EIS and has struck out further consideration for the area identified as HAMU 9. As provided in the Heritage Division response to the EIS for this area, further archaeological investigation is warranted to establish the significance and rarity of potential archaeological remains.
- The RtS notes that the area of HAMU 10 has potential for archaeological remains to survive beneath the existing floor slab and between building footings as outlined in the EIS. It is noted in the RtS that a HARD proposing test excavation to determine the nature, condition and extent of potential archaeological remains is recommended prior to the start of works.

- The RtS indicates at the revised Summary of environmental management measures that the area identified as HAMU 11 would be further investigated with the preparation of a HARD to establish the significance and rarity of archaeological remains.

Should you have any queries, please contact David Nix, Senior Heritage Officer, Major Projects at the Heritage Division on (02) 9895 6523 or at david.nix@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 Heritage Operations
Heritage Division
Office of Environment and Heritage
As Delegate of the Heritage Council of NSW
20 February 2018