



Southwest Metro – Marrickville, Canterbury and Lakemba Station Upgrades Heritage Management Plan

Haslin Stephen Edwards Joint Venture Integrated Management System (IMS)

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Terms and Definitions

Terms	Definitions
AARD	Archaeological Assessment and Research Design
ACHAR	Aboriginal Cultural Heritage Assessment Report
AFG	Aboriginal Focus Group
AHIMS	Aboriginal Heritage Information Management System
AMS	Archaeological Method Statement
AMZ	Archaeological Management Zone
CEMF	Construction Environmental Management Framework
CEMP	Construction Environmental Management Plan
CHL	Commonwealth Heritage List
CoA	Conditions of Approval
CoCB	City of Canterbury-Bankstown Council
CSR	Combined Services Route
CSSI	Critical State Significant Infrastructure
DECC	NSW Department of Environment and Climate Change (now OEH)
DPC	Department of Premier and Cabinet
DPE	Department of Planning and Environment
ECM	Environmental Control Map
ED	Excavation Director
EIS	Environmental Impact Statement
EP&A Act	Environment Planning and Assessment Act 1979 (NSW)
EPA	NSW Environment Protection Authority
ER	Environmental Representative
GST	Galvanised Steel Troughing
HIA	Heritage Impact Assessment
HMP	Heritage Management Plan
HSE JV	Haslin Constructions & Stephen Edwards Constructions Joint Venture
IMS	Sydney Metro Integrated Management System
IWC	Inner West Council
LEP	Local Environmental Plan
Minister, the	The Minister of New South Wales (NSW) Planning
NP&W Act	NSW National Parks and Wildlife Act 1974
NSW	New South Wales
NVMP	Construction Noise and Vibration Management Plan
OEH	NSW Office of Environment and Heritage
PAD	Potential Archaeological Deposit
PIR	Preferred Infrastructure Report

Terms	Definitions
Proponent	The person or organisation identified as the proponent in Schedule 1 of the planning approval. In this case Sydney Metro Authority
RAPs	Registered Aboriginal Parties. As defined in the Aboriginal cultural heritage consultation requirements for proponents 2010
REMM	Revised Environmental Mitigation Measure
Secretary	The Secretary of the Department of Planning, Industry and Environment
SMA	Sydney Metro Authority
SPIR	Submissions and Preferred Infrastructure Report
SSI	State Significant Infrastructure
TfNSW	Transport for New South Wales
WHL	World Heritage List

1. Introduction

1.1. Context and scope of this Sub-Plan

This Heritage Management Plan (HMP or Plan) forms part of the Construction Environmental Management Plan for Southwest Metro – Marrickville, Canterbury and Lakemba Station Upgrades (the Project).

This HMP has been prepared to address the requirements of the Conditions of Approval (CoA) in State Significance Infrastructure (SSI) approval 8256 including Modification 1 determined October 2020, the Revised Environmental Mitigation Measures (REMM) and the Sydney Metro Construction Environmental Management Framework (CEMF) as referenced in Table 4 and Appendix A.

This HMP describes how Haslin Constructions & Stephen Edwards Constructions Joint Venture (HSE JV) proposes to manage and protect Aboriginal and non-Aboriginal heritage during the construction of the Project. The HMP describes how HSE JV will ensure risks associated with heritage management are considered and managed effectively during the construction of the Project. It has been prepared to support and should be read in conjunction with the Sydney Metro CEMF as well as a number of Sydney Metro and HSE JV prepared heritage related plans and procedures.

1.2. Project Background

The Sydney Metro City and Southwest – Sydenham to Bankstown Environmental Impact Statement (EIS) (GHD/AECOM September 2017) assessed the impacts of construction and operation on Non-Aboriginal heritage and Aboriginal heritage within Chapter 14 (Non-Aboriginal heritage) and Chapter 15 (Aboriginal heritage) respectively. The Sydney Metro City and Southwest – Sydenham to Bankstown Upgrade Submissions and Preferred Infrastructure Report (SPIR) (GHD/AECOM June 2018) was prepared in response to the submissions received during the EIS exhibition period. The SPIR revised the scope of the Sydenham to Bankstown Upgrade project, resulting in an overall reduction of potential heritage impacts during construction and the updated Non-Aboriginal Heritage Assessment was included in SPIR Appendix F.

Impact to items in the Project’s study area as assessed in the SPIR are listed in Table 1 and are shown in Figure 1, Figure 2 and Figure 3.

Table 1: Impacts to heritage items (SPIR) relevant to this Project

Item	Significance level	Direct	Visual	Potential direct	Significance retained?
Stone house, including interiors	Local	Neutral	Neutral	Negligible	Yes
Marrickville Railway Station Group	State	Moderate	Moderate	Negligible	Yes
Sewage Pumping Station 271	Local	Neutral	Neutral	Negligible	Yes
Federation Post Office Building (former Canterbury Post Office)	Local	Neutral	Neutral	Negligible	Yes
Inter-War Hotel (former Hotel)	Local	Neutral	Neutral	Negligible	Yes

Item	Significance level	Direct	Visual	Potential direct	Significance retained?
Canterbury					
Old Sugarmill	State	Neutral	Negligible	Negligible	Yes
Canterbury Railway Station Group	State	Moderate	Moderate	Negligible	Yes
Canterbury (Cooks River) Underbridge	Local	Neutral	Negligible	Negligible	Yes
Canterbury (Cooks River/Charles St) Underbridge – Main Line	Local	Minor	Minor	Negligible	Yes
Lakemba Railway Station Group	Local	Moderate	Moderate	Negligible	Yes

Please refer to Section 1 of the CEMP for Project Description.

1.3. Objectives and targets

The HMP provides the basis for the management of heritage issues and aims to minimise the risk of impact during the course of the development, and to mitigate any impact that cannot be avoided. Mitigation and management measures are outlined in Table 13.

The objectives and targets of heritage management and mitigation are outlined below:

- Minimise impacts on items or places of heritage value;
- Avoid accidental impacts on heritage items;
- Maximise workers’ awareness of Aboriginal and non-Aboriginal heritage;
- No disturbance or damage to known heritage sites or items, beyond that approved by the SSI Approval;
- Unknown or undocumented heritage items are not knowingly destroyed, defaced or damaged;
- Consult with Registered Aboriginal Parties and other identified stakeholders prior to impacts in areas which have been assessed to possess archaeological potential, and/or upon the discovery of unexpected Non-Aboriginal and Aboriginal objects or cultural features;
- Any historical relics found on site shall be kept safe for consideration for incorporation into interpretation within the public domain—within the proposed site fixtures as may be supported by the Interpretation Strategy and Plan; and
- No harm, destruction or defacement of human remains, including Aboriginal burials, will occur.

These objectives conform to Sydney Metro’s objectives as described in the CEMF.

1.4. Consultation

CoA C3(d) requires that the HMP be prepared in consultation with the relevant Councils and Department of Premier and Cabinet Heritage NSW (formerly Heritage Division) as delegate

for the NSW Heritage Council. As such the following stakeholders have been consulted with in developing this HMP:

- Heritage NSW;
- City of Canterbury Bankstown Council (CoCB); and
- Inner West Council (IWC).

A summary of the consultation is provided in Table 2 and in Appendix C.

Table 2: Consultation carried out in the development of this Plan

CoA	Agency Consultation	Requirements and date submitted	Key issues raised	HMP Section Reference
C6	Department of Planning and Environment (DPE)	Submitted for Approval	Provide evidence of attempts to consult with CoCB Council	Section 1.4, Appendix C Table 13 (Rev03) and Table 5 / Section 5.2 (Rev02)
			Provide status of preparation of the Excavation Directors Report and confirm it will be prepared in consultation with Heritage NSW. Include the name of the nominated Excavation Director for clarity.	Section 5.3.9 Page 42
			Provide status of the AMS including timing for its completion.	Section 5.3.3 Page 40
			Update the CHMP to correctly note that consultation has now been completed.	Section 1.4 Table 4
C3(d)	Department of Premier and Cabinet Heritage NSW (formerly Heritage Council)	Issued for consultation 4/11/20 Invited to a consultation workshop held on 9/11/20 Responses received 24/11/20 and 25/11/20	Reference to <i>Heritage Council's Criteria for Assessment of Excavation Director's</i> should be 2019, not 2011. Inconsistency between the use of Aboriginal and Indigenous throughout documents. Inconsistency in post-excavation reporting timeframes.	Revisions made to: Section 1.3 Table 5 Section 5.3.3 Table 13

CoA	Agency Consultation	Requirements and date submitted	Key issues raised	HMP Section Reference
	CoCB	<p>Issued for consultation 4/11/20</p> <p>Invited to a consultation workshop held on 9/11/20</p> <p>Followed up with CoCB via email on 19/11/20</p> <p>Followed up with CoCB via phone call on 24/11/20</p> <p>Followed up with CoCB via email on 30/11/20</p> <p>Followed up with CoCB on: 14/12/20</p> <p>Response received 24/12/20</p>	<p>Issues with heritage specialist role titles relating to built heritage in Table 13 of this Sub-plan.</p>	<p>Revisions made to:</p> <p>Table 5</p> <p>Section 5.2</p> <p>Table 13</p>
	IWC	<p>Issued for consultation 4/11/20</p> <p>Invited to a consultation workshop held on 9/11/20</p> <p>Response received 16/11/20</p>	<p>Conflicting heritage specialist role titles and responsibilities within Sub-plan.</p> <p>Request for IWC to receive the Excavation Directors Report.</p>	<p>Revisions made to Section 5.2.13</p>

Consultation with Registered Aboriginal Parties (RAP) was undertaken during concept design as part of the Sydney Metro Sydenham to Bankstown EIS and also during the preparation of the Aboriginal Cultural Heritage Assessment Report (ACHAR). No further RAP consultation is required under the CoA or REMM in the preparation of this HMP.

RAPs will be involved if Aboriginal objects were identified during excavations.

2. Legal and other requirements

The HMP addresses applicable requirements within the following documents:

- The Sydney Metro *City and Southwest - Sydenham to Bankstown Upgrade Conditions of Approval SSI-8256*, determined 12 December 2018 and modified 22 October 2020;
- The Sydney Metro *City and Southwest - Sydenham to Bankstown Upgrade Environmental Impact Statement*, September 2017;
- The Sydney Metro *City and Southwest - Sydenham to Bankstown Upgrade Submissions and Preferred Infrastructure Report*, dated June 2018;
- The Sydney Metro *City and Southwest - Sydenham to Bankstown Upgrade Bankstown Station Modification Report* May 2020;
- The Sydney Metro *Sydenham to Bankstown Staging Report*;
- The Sydney Metro *Construction Environmental Management Framework v3.2*.

The Compliance Matrix in Section 2.2 provides a comprehensive list of compliance requirements, environmental documents and contract documents.

Table 3 details the legislation and planning instruments considered during development of this Plan.

Table 3: Legislation and Planning Instruments

Legislation	Description	Relevance to this HMP
Environmental Planning and Assessment Act 1979	This Act establishes a system of environmental planning and assessment of development proposals for the State.	The approval conditions and obligations are incorporated into this HMP.
Environment Protection and Biodiversity Conservation (EPBC) Act 1999 (Cwth)	The main purpose of this Act is to provide for the protection of the environment, especially those aspects that are of national environmental importance and to promote ecological sustainable development. Heritage places are listed on the National Heritage List (NHL) for their 'outstanding heritage value to the nation' and are owned by a variety of constituents, including government agencies, organisations or individuals. Only items owned or controlled by the Commonwealth that meet the threshold for national heritage listing under the Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act) are listed on the Commonwealth Heritage List (CHL) and/or the World Heritage	Not relevant as no NHL, CHL or WHL items.

Legislation	Description	Relevance to this HMP
	List (WHL) and afforded protection under the EPBC Act.	
National Parks and Wildlife Act 1974	The relevance of this Act is firstly in respect to the protection and preservation of Aboriginal artefacts. Discovery of material on site suspected as being of Aboriginal origin must be reported and protected pending assessment and direction by Sydney Metro.	No Aboriginal sites or areas of archaeological potential have been identified within the Project site. An Aboriginal heritage impact permit under section 90 of the National Parks and Wildlife Act 1974 is not required for works approved under Part 5.1 of the EP&A Act.
Heritage Act 1977	This Act provides for the preservation and conservation of heritage items such as buildings, works, relics, places of historic interest, scientific, cultural, social, archaeological, architectural, natural or aesthetic significance. It is an offence under this Act to wilfully and knowingly damage or destroy items of heritage value. Do not demolish, damage, move or develop around any place, building, work, relic, moveable object, precinct, or land that is the subject of an interim heritage order or listing on the State Heritage Register or heritage listing in a Local Environmental Plan without an approval from the Heritage NSW or local council.	Heritage Items are identified on the Project site and addressed as part of the CoA. An approval under Part 4, or an excavation permit under section 139, of the Heritage Act 1977 is not required for works approved under Part 5.1 of the EP&A Act.
Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cwth)	This Act provides for preservation and protection from injury or desecration to areas and objects of particular significance to Aboriginals. Areas and objects can be protected by Ministerial Declaration and it is then an offence to contravene such a declaration.	No areas or objects within the Project have been identified as being subject to such a declaration and this Act is of little relevance to the Project.
Coroners Act 2009	This Act enables coroners to investigate certain kinds of deaths or suspected deaths in order to determine the identities of the deceased persons, the times and dates of their deaths and the manner and cause of their deaths.	This Act is relevant if Human Skeletal Remains are located within the Project area.

A number of heritage reports were prepared during detailed design for the Marrickville, Canterbury and Lakemba Station upgrades, in order to address design related REMM. The findings and recommendations of these reports have been included in the HMP where relevant. It is noted in the compliance matrix where the design related REMM for the project has been fulfilled by these reports (refer to Appendix A).

- Sydney Metro *City and Southwest Movable Heritage Strategy*, March 2021;

- Sydney Metro *City and Southwest Adaptive Reuse Strategy*, November 2021;
- Sydney Metro *City and Southwest Heritage Salvage Strategy*, March 2021;
- Sydney Metro *City and Southwest Significant Elements Register Marrickville Station*, November 2020;
- Sydney Metro *City and Southwest Significant Elements Register Canterbury Station*, November 2020;
- Sydney Metro *City and Southwest Significant Elements Register Lakemba Station*, November 2020;
- Sydney Metro *City and Southwest Heritage Impact Assessment Marrickville Station*, March 2021;
- Sydney Metro *City and Southwest Heritage Impact Assessment Canterbury Station*, March 2021;
- Sydney Metro *City and Southwest Heritage Impact Assessment Lakemba Station*, March 2021;
- Sydney Metro *City and Southwest Photographic Archival Report Marrickville Station*, November 2020;
- Sydney Metro *City and Southwest Photographic Archival Report Canterbury Station*, November 2020;
- Sydney Metro *City and Southwest Photographic Archival Report Lakemba Station*, November 2020;
- Sydney Metro *City and Southwest Heritage Interpretation Plan Marrickville Station*, April 2020;
- Sydney Metro *City and Southwest Heritage Interpretation Plan Canterbury Station*, April 2020; and
- Sydney Metro *City and Southwest Heritage Interpretation Plan Lakemba Station*, April 2020.

2.1. Guidelines

Additional guidelines and standards to the management of heritage include:

- *Code of Practice for the archaeological investigation of Aboriginal objects in NSW*, (OEH 2010);
- *Aboriginal cultural heritage consultation requirements for proponents 2010* (OEH 2010);
- *Due Diligence Code of practice for protection of Aboriginal objects in NSW* (OEH 2010);
- *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2010);
- *Assessing Heritage Significance* (NSW Heritage Office 2001);
- *Levels of Heritage Significance* (NSW Heritage Office 2008);

- *Assessing Significance for Historical Archaeological Sites and Relics* (NSW Heritage Branch, Department of Planning 2009);
- *Investigating Heritage Significance* (NSW Heritage Office 2001);
- *How to Prepare Archival Recording of Heritage Items* (Heritage Branch 1998);
- *Photographic Recording of Heritage Items Using Film or Digital Capture* (Heritage Branch 2006).

2.2. Conditions of Approval

The CoA and CEMF requirements relevant to preparation of this HMP are listed in Table 4. In accordance with CoA C4, the relevant requirements of the CEMF have also been included in Table 4. Table 4 also provides a cross reference to demonstrate where the CoA or REMM is addressed in this HMP or other management documents.

Please refer to Appendix A for all other CoA, CEMF and REMM requirements relevant to development and implementation of this HMP.

Table 4: HMP Compliance Matrix

No.	Requirement	Reference	How addressed?			
Conditions of Approval						
C3	<p>The CEMP Sub-plans must be prepared in consultation with the relevant government agencies identified for each CEMP Sub-plan and be consistent with the CEMF and CEMP referred to in Condition C1:</p> <table border="1"> <tr> <td>(d)</td> <td>Heritage</td> <td>Heritage Council (or its delegate) and relevant council(s)</td> </tr> </table>	(d)	Heritage	Heritage Council (or its delegate) and relevant council(s)	Section 1.4 Appendix C	This Plan has been prepared in accordance with this condition and describes how HSE JV proposes to manage heritage during construction of the Project. This Plan has been provided to Heritage NSW, City of Canterbury Bankstown and Inner West Council for consultation. Details of consultation are provided in Section 1.4 and Appendix C.
(d)	Heritage	Heritage Council (or its delegate) and relevant council(s)				
C4	The CEMP Sub-plans must be prepared in accordance with the CEMF	This Table	Table 4 demonstrates how this Plan has been prepared in accordance with the relevant requirements of the CEMF.			
C5	Details of all information requested by an agency to be included in a CEMP Sub-plan as a result of consultation, including copies of all correspondence from those agencies, must be provided with the relevant CEMP Sub-Plan.	Section 1.4 Appendix C	This Plan has been provided to Heritage NSW, City of Canterbury Bankstown and Inner West Council for consultation. Details of consultation are provided in Section 1.4 and Appendix C.			
C6	Any of the CEMP Sub-plans may be submitted along with, or subsequent to, the submission of the CEMP but in any event, no later than one (1) month before Construction.	Refer to section 1.2 of the CEMP	This Plan will be submitted for approval to DPE along with or subsequent to the final submission of the CEMP for DPE approval, and no later than one month prior to construction.			
C7	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary, including any minor amendments approved by the ER must be implemented for the duration of Construction. Where Construction of the CSSI is staged, Construction of a stage must not commence until the CEMP and CEMP Sub-plans for that stage have been approved by the Planning Secretary.	Refer to section 1.2 of the CEMP	Construction will not commence until the CEMP and all CEMP Sub-plans have been approved by DPE. The CEMP and Sub-plans will be implemented for the duration of construction.			
E10	Following completion of Work described in the documents listed in Conditions A1 and A2 in relation to heritage items, a Heritage Report including the details of any archival recording, further historical research either undertaken or to be carried out and archaeological excavations (with artefact analysis and identification of a final repository for finds), must be prepared in accordance with any guidelines and standards required by the Heritage Council of NSW and OEH.	Section 5.2.3 Section 5.3.8	The Heritage Report will be completed at the completion of the works in compliance with CoA E10. This is detailed in sections 5.2.3 and 5.3.9 of the Heritage Management Plan.			

No.	Requirement	Reference	How addressed?
E11	An Excavation Director’s Report (EDR) must be prepared for any heritage items of State significance that are discovered during Work. The EDR must be prepared in consultation with OEH.	Section 5.3.8 Table 13	The Historical Archaeological Excavation Report will be prepared at the completion of the works and in accordance with CoA E11 and as detailed in sections 5.3.9 and 7.3 of the Heritage Management Plan.
E12	The Heritage Report and Excavation Directors Report must be submitted to the Planning Secretary, the Heritage Council of NSW and OEH for information no later than 24 months after the completion of Work referred to in Condition E10.	Section 5.3.8 Table 13	The Heritage Report will be completed at the completion of the works in compliance with CoA E10. This is detailed in sections 5.2.3 and 5.3.9 of the Heritage Management Plan. The Historical Archaeological Excavation Report will be prepared at the completion of the works and provided to the relevant agencies in compliance with CoA E12. This is detailed in sections 5.3.9 and 7.3 of the Heritage Management Plan.
E13	The Proponent must prepare a Heritage Interpretation Strategy which outlines a process to interpret key Aboriginal and non-Aboriginal heritage values and stories of heritage items in the final project design. The Heritage Interpretation Strategy must be prepared in consultation with the Heritage Council of NSW and submitted to the Planning Secretary for information before the commencement of Construction.	Section 5.2.4	Sydney Metro prepared the Sydney City and Southwest: Sydenham to Bankstown Line Heritage Interpretation Strategy, and issued this for information to DPE on 3 June 2020. Details included in section 5.2.4 of this Heritage Management Plan.
E14	A Heritage Interpretation Plan(s) must be prepared, consistent with the Heritage Interpretation Strategy which identifies heritage items to be used in the final design of the project. The plan(s) must identify how items will be interpreted and provide a timeframe for their implementation which must be no later than the commencement of Operation. Heritage interpretation in any station precinct must be identified in the relevant Station Design and Precinct Plan(s) required in Condition E56. The Heritage Interpretation Plan must be prepared in accordance with the NSW Heritage Manual, the NSW Heritage Office’s Interpreting Heritage Places and Items: Guidelines (August 2005), and the NSW Heritage Council’s Heritage Interpretation Policy.	Section 5.2.4	In accordance with CoA E14, individual Heritage Interpretation Plans have been prepared by Metron T2M for each station precinct as part of the Sydney Metro Sydenham to Bankstown upgrade detailed design process. These requirements have been met during the detailed design phase.

No.	Requirement	Reference	How addressed?
E15	Unexpected Heritage Finds and Human Remains Procedure must be prepared to manage unexpected heritage finds in accordance with the guidelines and standards prepared by the Heritage Council of NSW or OEH.	Section 5.1.3 Section 5.3.4 Sydney Metro Unexpected Finds Procedure (Appendix D) Sydney Metro Exhumation Management Plan	An Unexpected Heritage Find Procedure has been prepared by Sydney Metro and incorporated into the Sydney Metro Integrated Management System (IMS); Document reference SM-18-00105232. This has been prepared in accordance with guidelines and standards. The above has been incorporated by HSEJV in this Heritage Management Plan.
E16	The Unexpected Heritage Finds and Human Remains Procedure must be prepared by a suitably qualified and experienced heritage specialist in consultation with the Heritage Council of NSW and submitted to the Planning Secretary for information no later than one (1) month before the commencement of Construction.	Section 5.1.3 Section 5.3.4 Sydney Metro Unexpected Finds Procedure (Appendix D) Sydney Metro Exhumation Management Plan	Sydney Metro has prepared the Unexpected Finds Procedure, which has been incorporated by HSEJV in Appendix D of this Heritage Management Plan. Sydney Metro's Unexpected Finds Procedure was submitted to the Planning Secretary for information on 9 July 2019 (Unexpected Finds Procedure v2.0, EMP v3.0).
E17	The Unexpected Heritage Finds and Human Remains Procedure, as submitted to the Planning Secretary, must be implemented for the duration of Construction and during Operational maintenance Work. Note: Human remains that are found unexpectedly during Work are under the jurisdiction of the NSW State Coroner and must be reported to the NSW Police immediately.	Section 5.1.3 Section 5.3.4 Sydney Metro Unexpected Finds Procedure (Appendix D)	The Unexpected Heritage Finds and Human Remains Procedure, as submitted to the Planning Secretary, would be implemented for the duration of Construction and during Operation maintenance Work. It is noted that any Human remains found unexpectedly during Work are under the jurisdiction of the NSW State Coroner and would be reported to the NSW Police immediately.
Construction Environmental Management Framework			
10.2(a)	Principal Contractors will develop and implement a Heritage Management Plan which will include as a minimum:	-	This Plan

No.	Requirement	Reference	How addressed?
i.	Evidence of consultation with Registered Aboriginal Parties and the NSW Heritage Council	Section 1.4 Appendix B Appendix C	RAP consultation was undertaken, however no PADS were identified for HSE JV's scope of works. As outlined in Section 1.4, the key stakeholders related to Heritage who will be consulted in finalisation of this HMP are <ul style="list-style-type: none"> Heritage NSW (delegate of the Heritage Council) City of Canterbury Inner West Council
ii.	Identify initiatives that will be implemented for the enhancement of heritage values and minimisation of heritage impacts, including procedures and processes that will be used to implement and document heritage management initiatives	Table 13	Table 13 includes detailed management and mitigation measures which include all relevant requirements of the CoA, REMM and recommendations of the Heritage Impact Assessment reports prepared during detailed design, as outlined in Section 2.
iii.	The heritage mitigation measures as detailed in the environmental approval documentation	Section 5 Table 13 Appendix A	The Table in Appendix A outlines how the heritage mitigation measures as detailed in the environmental approval documentation have been considered in the development of this Plan.
iv.	The responsibilities of key project personnel with respect to the implementation of the plan	Section 2.3 Table 5	Section 2.3 and Table 5 outline roles and responsibilities of key Project personnel with respect to the implementation of this Plan.
v.	Procedures for interpretation of heritage values uncovered through salvage or excavation during detailed design	Section 2 Section 5.2.4	As outlined in Section 2 and 5.2.4, a Heritage Interpretation Strategy has been prepared for the Sydney Metro Sydenham to Bankstown upgrade project and individual Heritage Interpretation Plans have been prepared for each station precinct by Artefact Heritage as part of detailed design. This requirement has been met during design phases.
vi.	Procedures for undertaking salvage or excavation of heritage relics or sites (where relevant), consistent with and any recordings of heritage relics prior to works commencing that would affect them	Section 5.3.2	An Archaeological Method Statement (AMS) has been prepared for this Project which will include appropriate archaeological management strategies in accordance with the Archaeological Assessment and Research Design (AARD).
vii.	Details for the short term and/or long-term management of artefacts or movable heritage	Section 5.3.7	The Sydenham to Bankstown Moveable Heritage Strategy outlines retention, storage and reinstatement requirements for moveable heritage identified at Marrickville, Canterbury and Lakemba Stations.

No.	Requirement	Reference	How addressed?
viii.	Details of management measures to be implemented to prevent and minimise impacts on heritage items (including further heritage investigations, archival recordings and/or measures to protect unaffected sites during construction works in the vicinity)	Section 5 Table 13	As outlined in Section 5 and Table 13 the following measures have been put in place to minimise adverse impacts: <ul style="list-style-type: none"> • Exclusion zones; • Recommendations of the station specific heritage impact assessments as outlined in Table 13 will be adhered to; • Use of a heritage architect/heritage engineer where required; • Sydney Metro Unexpected Heritage Finds Procedure; • Archaeological management under the AARD and AMS.
ix.	Procedures for unexpected heritage finds, including procedures for dealing with human remains	Section 5.1.3 Section 5.3.4 Sydney Metro Unexpected Heritage Finds Procedure (Appendix D)	The Sydney Metro Unexpected Heritage Finds Procedure will be implemented for the Project. It is not expected that human remains will be encountered as no potential for burials has been identified. The Sydney Metro Exhumation Plan will be implemented where required.
x.	Heritage monitoring requirements	Section 7	Monitoring of works within Archaeological Management Zones will occur in accordance with the requirements of the relevant AMS and the instruction of the Excavation Director.
xi.	Compliance record generation and management	Section 7	Compliance record generation and management in relation to this Plan will be undertaken in accordance with Section 7.

2.3. Roles and responsibilities

The roles and responsibilities of key personnel with respect to heritage management are as followed in Table 5. All personnel are responsible for ensuring that heritage items are protected.

Table 5: Roles and responsibilities

Roles	Responsibilities
Department of Planning, Industry and Environment	<ul style="list-style-type: none"> • Approval of the Heritage Management Plan • Monitor HSE JV compliance with the Heritage Management Plan.
Project Director	<ul style="list-style-type: none"> • Ensure that sufficient resources are allocated for the implementation of this HMP • Ensure that the CEMP covers the management and mitigation measures presented in this HMP • Ensure that the outcomes of the visual checks/ compliance construction monitoring/ incident reporting are systematically evaluated as part of ongoing management of construction activities • Ensure audits of construction site records/ monitoring records/ incident reports are undertaken and findings are shared with relevant site personnel and corrective actions are implemented • Authorise all monitoring reports and any revisions to this HMP.



Roles	Responsibilities
<p>Environment Manager</p>	<ul style="list-style-type: none"> • Oversee the overall implementation of this HMP • Site Inductions • Ensure all relevant personnel have access to and understand the most up-to-date copy of this HMP • Ensure that any required actions arising from the detection of unexpected heritage items or if works are required outside of the approved development footprint are reported to the relevant personnel for further action and ensure that the actions are effectively implemented • Ensure all monitoring reporting requirements are met and maintained on site.
<p>Construction supervisors Subcontractors</p>	<ul style="list-style-type: none"> • Understand and implement mitigation protocols as required in the HMP and any other required measures during construction • Undertake relevant training to implement the requirements of this HMP • All personnel are responsible for ensuring that heritage items are protected • All site personnel to undertake toolbox talks in relation to the reporting process for unexpected finds • Informing the Environmental



Roles	Responsibilities
	<p>Manager of any heritage issues as they arise.</p>
<p>Environmental Representative</p>	<ul style="list-style-type: none"> • Receive and respond to communications from the Secretary in relation to the environmental performance of the Project; • Receive and respond to communication from the Planning Secretary in relation to the environmental performance of the CSSI; • Consider and inform the Planning Secretary of matters specified in the terms of this approval; • Consider and recommend to the Proponent any improvements that may be made to work practices to avoid or minimise the adverse impact on the environment and on the community; • Review documents identified in Conditions C1, C3 and C8 and any other documents that are identified by the Planning Secretary, to ensure they are consistent with requirements in or under this approval and if so: <ul style="list-style-type: none"> ○ (i) make a written statement about this effect before the submission of such documents to the Planning



Roles	Responsibilities
	<p>Secretary (if those documents are required to be approved by the Planning Secretary), or</p> <ul style="list-style-type: none"> ○ (ii) make a written statement about this effect before the implementation of such documents (if those documents are required to be submitted to the Planning Secretary for information or are not required to be submitted to the Secretary); • Regularly monitor the implementation of the documents listed in Conditions C1, C3 and C8 to ensure implementation is being carried out in accordance with the document and the terms of this approval; • As may be requested by the Planning Secretary, help plan, attend or undertake audits of the development commissioned by the Department including scoping audits, programming audits, briefings and site visits, but not independent environmental audits required under Condition A34 of this approval; • As may be requested by the



Roles	Responsibilities
	<p>Planning Secretary, assist the Department in the resolution of community complaints;</p> <ul style="list-style-type: none"> • Assess the impacts of minor ancillary facilities as required by Condition A19 of this approval; • Consider any minor amendments to be made to the documents listed in Conditions C1, C3 and C8 and any document that requires the approval of the Planning Secretary that comprise updating or are of an administrative or minor nature and are consistent with the terms of this approval and the documents listed in Conditions C1, C3 and C8 or other documents approved by the Planning Secretary and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of this approval; and • Prepare and submit to the Planning Secretary and other relevant regulatory agencies, for information, an Environmental Representative Monthly Report detailing the ER's actions and decisions on matters for which the ER was responsible in the preceding month. The Environmental Representative

Roles	Responsibilities
	<p>Monthly Report must be submitted within seven (7) days following the end of each month for the duration of the ER's engagement for the CSSI.</p>
<p>Primary Excavation Director</p>	<ul style="list-style-type: none"> • The Primary Excavation Director must be suitably qualified and be someone who meets the Heritage Council of NSW's Criteria for Assessment of Excavation Directors (September 2019) to oversee and advise on matters associated with historic archaeology and advise DPE and Heritage NSW • The Excavation Director must be present to oversee excavation and advise on archaeological issues. • The Excavation Director has the authority to advise on the duration and extent of oversight required as informed by the provisions of the approved AARD and Excavation Methodology • The HSE JV will nominate an Excavation Director who is able to manage State significant archaeology under the NSW Heritage Council Excavation Directors Criteria • The Primary Excavation Director will be engaged by HSE JV.



Roles	Responsibilities
Heritage Consultant	<ul style="list-style-type: none">The Heritage consultant will be responsible for providing advice and guidance to manage and minimise potential impacts to any built heritage values through a variety of means, prepare heritage impact assessment reports for built heritage and to undertake required archival recording of the heritage items in accordance with the approval and relevant documentsThe Heritage Consultant will be engaged by HSE JV.
Forensic Anthropologist	<ul style="list-style-type: none">The Forensic Anthropologist will respond to the finding of potential human remains in accordance with the Sydney Metro Exhumation Management PlanThe Forensic Anthropologist will be engaged by HSE JV if required.
Conservation Architect	<ul style="list-style-type: none">The Conservation Architect will provide advice and review work methodologies where direct impacts to significant fabric of heritage are proposedThe Conservation Architect will be engaged by HSE JV.

3. Existing environment

3.1. Context

The existing environment and heritage context of the Project has been assessed in the following background reports prepared to support the EIS and SPIR prepared for the Sydney Metro Sydenham to Bankstown upgrade project:

- Sydney Metro *City and Southwest – Sydenham to Bankstown: Aboriginal Heritage Archaeological Assessment*, prepared by Artefact Heritage (2017a).
- Sydney Metro *City and Southwest – Sydenham to Bankstown: Non-Aboriginal Heritage Impact Assessment*, prepared by Artefact Heritage (2017b).
- Sydney Metro *City and Southwest Heritage Impact Assessment Marrickville Station*, October 2020
- Sydney Metro *City and Southwest Heritage Impact Assessment Canterbury Station*, October 2020
- Sydney Metro *City and Southwest Heritage Impact Assessment Lakemba Station*, October 2020.

Additional reports, which have been prepared for the project and have been used to support this Plan also include:

- Sydney Metro *City and Southwest – Sydenham to Bankstown Historical Archaeological Assessment and Research Design (AARD)*, prepared by Artefact Heritage (2017c); and
- Sydney Metro *City and Southwest – Sydenham to Bankstown: Aboriginal Cultural Heritage Assessment Report (ACHAR)*, prepared by Artefact Heritage (2017d).

These reports have been written to inform this Plan in regard to the existing environment, heritage significance and archaeological potential.

3.2. Aboriginal heritage

Artefact Heritage (2017a) undertook a heritage assessment of the Sydney Metro City and Southwest – Sydenham to Bankstown Project. An ACHAR was also prepared in consultation with the RAPs (2017d). No previously registered Aboriginal sites were located within the Project area. Two areas of potential archaeological deposits (PAD) were located during the site survey for the EIS study, but these are outside the Project area, near Belmore and Punchbowl Stations. The remainder of the EIS project area was found to have low Aboriginal archaeological potential and significance.

3.3. Built heritage

The Project works would be largely within the listed curtilages for Marrickville, Canterbury and Lakemba Stations and will affect platform, platform buildings and areas within the rail corridor. A number of heritage items will be adjacent to the Project works areas but will not be directly impacted. Consideration will be given to indirect impacts such as vibration and visual impacts. These heritage items and their registered listings are shown in Table 6.

Table 6: Heritage listed Items in and near the Project area

Item	Listings	Significance
Stone house, including interiors	<ul style="list-style-type: none"> Marrickville LEP 2011 (I114) 	Local
Marrickville Railway Station Group	<ul style="list-style-type: none"> SHR (01186) RailCorp S.170 Heritage and Conservation Register (4801091) Marrickville LEP 2011 (I89) 	State
Sewage Pumping Station 271	<ul style="list-style-type: none"> Marrickville State SHR (01342) Sydney Water S.170 Heritage and Conservation Register (4571727) Marrickville LEP 2011 (I67) 	Local
Federation Post Office Building (former Canterbury Post Office)	<ul style="list-style-type: none"> Canterbury LEP 2012 (I66) 	Local
Inter-War Hotel (former Hotel Canterbury)	<ul style="list-style-type: none"> Canterbury LEP 2012 (I68) 	Local
Old Sugarmill	<ul style="list-style-type: none"> SHR (00290) Canterbury LEP 2012 (I82) 	State
Canterbury Railway Station Group	<ul style="list-style-type: none"> SHR (01109) RailCorp S.170 Heritage and Conservation Register (4801100) Canterbury LEP 2012 (I67) 	State
Canterbury (Cooks River) Underbridge	<ul style="list-style-type: none"> RailCorp S.170 Heritage and Conservation Register (4801568) Canterbury LEP 2012 (I72) 	Local
Canterbury (Cooks River/Charles St) Underbridge – Main Line	<ul style="list-style-type: none"> RailCorp S.170 Heritage and Conservation Register (5062566) 	Local
Lakemba Railway Station Group	<ul style="list-style-type: none"> RailCorp S.170 Heritage and Conservation Register (4801916) Canterbury LEP 2012 (I143) 	Local



Source: D:\GIS\GIS_Mapping\19052_Southwest Metro Corridor\19052_south west Metro



Heritage Curtilages Marrickville Station

19052 Southwest Metro Corridor
LGA: Canterbury-Bankstown & Inner West

Scale: 1:3500
Size: A4
Date: 28-10-2020

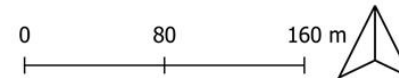
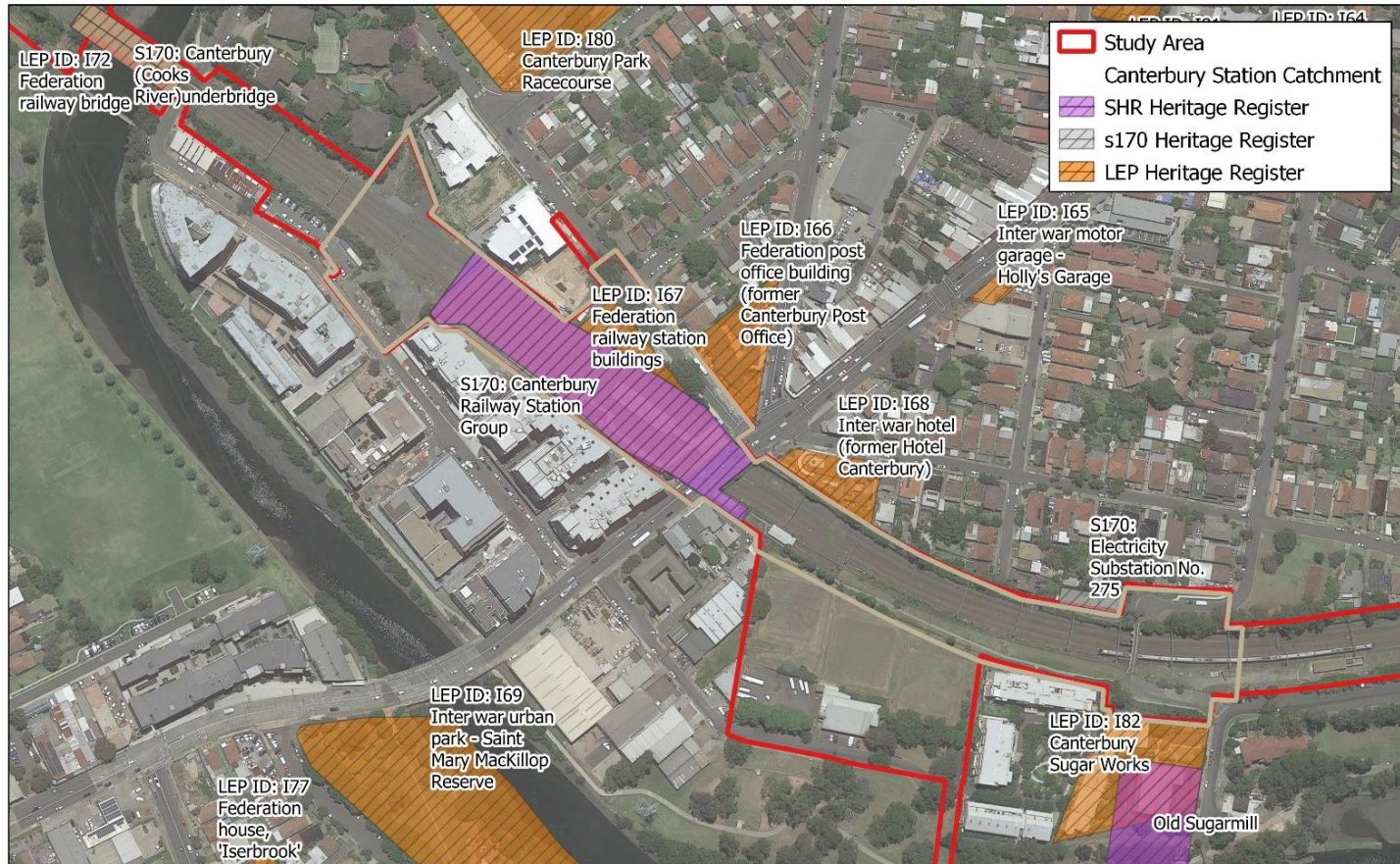


Figure 1 Heritage items – Marrickville Station



Source: D:\GIS\GIS_Mapping\19052 Southwest Metro Corridor\19052 south west Metro Corridor.mxd



Heritage Curtilages Canterbury Station

19052 Southwest Metro Corridor
LGA: Canterbury-Bankstown & Inner West

Scale: 1:3500
Size: A4
Date: 28-10-2020

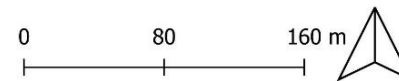
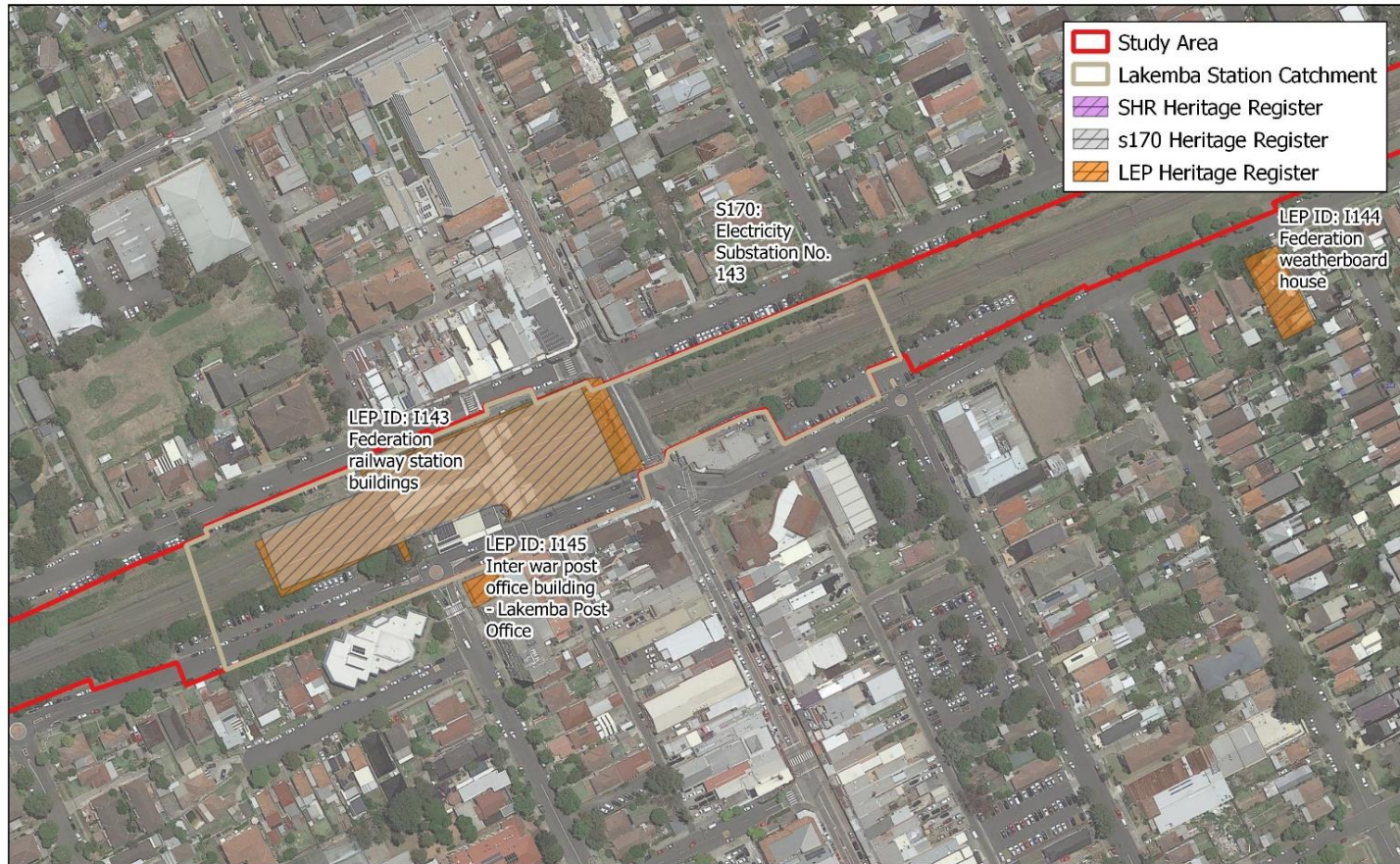


Figure 2 Heritage items – Canterbury Station



Source: D:\GIS\GIS_Mapping\19052 Southwest Metro Corridor\19052 south west Metro



Heritage Curtilages Lakemba Station

19052 Southwest Metro Corridor
LGA: Canterbury-Bankstown & Inner West

Scale: 1:3000
Size: A4
Date: 28-10-2020

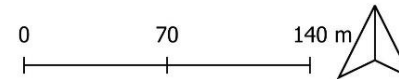


Figure 3 Heritage items – Lakemba Station

3.4. Non-Aboriginal archaeology

A summary of archaeological potential and significance is provided below with figures indicating areas of archaeological potential and required archaeological management from the SPIR shown in Figure 4 to Figure 9.

3.4.1. Marrickville Railway Station

The Project area includes a portion of the rail corridor through Marrickville Railway Station which was assessed in the AARD as having moderate-high potential for locally significant archaeology associated with the development of rail infrastructure. The area to be impacted by the Project works is designated in the AARD partly requiring an Archaeological Method Statement (AMS) and possibly archaeological management such as salvage excavation and monitoring, while a portion will be managed under the Sydney Metro Unexpected Heritage Finds Procedure. A former air raid shelter was also identified to the west of the station, which depending on intactness has the potential to reach the threshold of local significance.

The AARD assessed that there would be nil to low potential for archaeological remains associated with nineteenth century farming. Any remains are unlikely to have research value. There is moderate to high potential for archaeological remains associated with the late nineteenth and early twentieth century development of the Bankstown rail line, Marrickville Station and the Earlwood tramline, although they are likely to be truncated. These archaeological remains have potential to reach the threshold for local heritage significance, depending on the intactness. Potential archaeological remains of the WWII air raid shelter would be of local significance for research potential, associative and technical significance, and for demonstrating the historical and physical elements of Sydney’s defence and protection response to World War II.



Figure 4: Marrickville Station archaeological potential



Figure 5: Marrickville Station archaeological management

3.4.2. Canterbury Railway Station

The Project area includes a portion of the rail corridor within Canterbury Railway Station which was assessed in the AARD as having moderate potential for locally significant archaeology associated with the development of rail infrastructure. The Project area also includes a portion of the rail corridor east of Canterbury Railway Station which was assessed in the AARD as having a low potential for locally significant archaeology associated with the development of rail infrastructure and the early settlement of the township associated with the Canterbury Sugar Company. The area to be impacted by the Project is designated in the AARD partly requiring an AMS and archaeological management such as monitoring, while a portion will be managed under the Sydney Metro Unexpected Heritage Finds Procedure as remains are likely to have been impacted by the construction of the rail line. It is noted that any subsurface works within the Bowling club (shaded red in Figure 7) will require archaeological monitoring or salvage excavations. The location of subsurface works will be outlined in the AMS with detailed recommendations for work required.

The AARD found that there is nil to low potential for archaeological remains associated with nineteenth century farming to be present. Any remains are unlikely to have research value. There is moderate to high potential for the remains of structures associated with the Canterbury Sugar Company works and outbuildings. These would have high research value and associative and historical significance at a local or State level depending on nature and intactness, although remains of State significance are unlikely to be present in the Project area and are more likely outside the rail corridor as identified in the AARD. Archaeological remains associated with the historical development of the Bankstown rail line, Canterbury Station and Canterbury Park Racecourse may be present. Depending on the intactness of the remains, potential archaeological remains could reach the threshold for local significance.



Figure 6: Canterbury Station archaeological potential



Figure 7: Canterbury Station archaeological management

3.4.3. Lakemba Railway Station

The Project area includes a portion of the rail corridor through Lakemba Railway Station which was assessed in the AARD as having low-moderate potential for locally significant archaeology associated with the development of rail infrastructure. The Project area also includes a portion of the rail corridor east of Lakemba Railway Station which was assessed in the AARD as having a low potential for locally significant archaeology associated with the development of Taylor House (Lakemba) and associated stables and outbuildings. The area to be impacted by the Project works is designated in the AARD partly requiring an AMS and possibly archaeological management such as monitoring, while a portion will be managed under the Sydney Metro Unexpected Heritage Finds Procedure.

The AARD found that there is nil to low potential for archaeological remains associated with nineteenth century farming to be present. Any remains are unlikely to have research value. There is low potential for archaeological remains associated with the late nineteenth and early twentieth century establishment of the Taylor House (Lakemba), stables and potential outbuildings, as well as evidence of associated farming activities. There is low-moderate potential for archaeological remains associated with the late nineteenth and early twentieth century development of the Bankstown rail line and Lakemba Station, including the first timber island platform at the station. These archaeological remains have potential to reach the threshold for local heritage significance, depending on the intactness, particularly remains associated with ‘Lakemba’ and the Lakemba 1909 timber island platform.



Figure 8: Lakemba Station archaeological potential



Figure 9: Lakemba Station archaeological management

4. Construction risk assessment

Impacts of the Project are described in Table 7, Table 8 and Table 9, and the aspects and impacts registered in the CEMP. Management measures to address these identified risks are included in Section 5.

Table 7: Aboriginal Heritage – Aspects, Impacts and Risks

Activity	Aspect/s	Impact/s
Subsurface excavations to the natural ground surface. The risk is low as no areas within the Project were found to have Aboriginal archaeological potential.	Excavation	Finding/disturbance to and/or destruction of unexpected burials, human remains or Aboriginal objects.

Table 8: Built heritage – Aspects, Impacts and Risks

Activity	Aspect/s	Impact/s
Installation of Combined Services Route (CSR) and Galvanised Steel Troughing (GST) within curtilages of heritage items	Installation and minor excavations	Visual impacts, impacts to fabric
CSR overline crossing structure at Marrickville	Installation	Visual impacts
Bridge remedial works and anti-throw screen installation at Illawarra Rd overbridge, Canterbury Road overbridge and Haldon Street overbridge	Installation	Visual impacts, impacts to fabric
Removal of ARTC redundant infrastructure within curtilages of heritage items	Excavation, vibration and soil compaction due to the use of heavy machinery to hammer out overhead wire portals and footings	Temporary visual impacts on listed items, impacts on fabric
Refurbishment and repurposing of concourses	Removal of intrusive material, repurposing, impacts some significant fabric. Make good	Visual impacts on listed items, impact on fabric

Activity	Aspect/s	Impact/s
and platform station buildings		
Station precinct works and landscaping	Demolition of some elements and construction	Visual impacts, impacts to fabric
Installation of lifts and new pedestrian stairs	Installation and construction of lifts and stairs	Visual impacts, impacts to fabric
Platform works	Removal of brick and concrete coping and construction of Platform screen doors which will require struts to be anchored in the platform.	Visual impacts, removal of significant bricks
Construction and use of compound sites and laydown areas	Installation and operation	Temporary visual impacts to listed items.
Sydney Metro service buildings	Construction	Visual impacts
Removal of brick retaining wall at Canterbury	Demolition and rebuilding	Visual impacts, impacts to fabric
Canterbury Road Bridge parapet works	Removal and construction	Visual impacts, impacts to fabric
Temporary works	Pedestrian control and access, installation of hoarding, fencing and other temporary works such as temporary generator installation	Temporary visual impacts to listed items
Utilities and drainage works	Excavation, vibration and soil compaction due to the use of heavy machinery, cutting and filling, installation of fencing	Temporary visual impacts to listed items, impacts to fabric

Table 9: Non-Aboriginal Archaeology– Aspects, Impacts and Risks

Activity	Aspect/s	Impact/s
Installation of CSR and GST within curtilages of heritage items	Excavation	Disturbance to and/or destruction of non-Aboriginal archaeological deposits of local significance

Activity	Aspect/s	Impact/s
Construction and use of compound sites and laydown areas	Excavation	Disturbance to and/or destruction of non-Aboriginal archaeological deposits of local significance. Laydown area in Canterbury Archaeological Management Zone (AMZ) may require subsurface impacts with potential impact to significant archaeology
Services buildings at Lakemba and Marrickville within the AMZ	Excavation	Disturbance to and/or destruction of non-Aboriginal archaeological deposits of local significance
Platform works	Excavation into platforms	Disturbance to and/or destruction of non-Aboriginal archaeological deposits of local significance within or below platform level
Station precinct works and landscaping	Excavation	Disturbance to and/or destruction of non-Aboriginal archaeological deposits of local significance
Temporary works	Excavation	Disturbance to and/or destruction of non-Aboriginal archaeological deposits of local significance
Utilities and drainage works	Excavation	Disturbance to and/or destruction of non-Aboriginal archaeological deposits of local significance

5. Management measures

5.1. Aboriginal archaeological management

5.1.1. Aboriginal Cultural Heritage Assessment Report

An ACHAR was prepared by Artefact Heritage (2017d) as part of the Preferred Infrastructure Report (PIR) which forms part of the Approved Project as modified. Comprehensive Aboriginal consultation was undertaken as part of the preparation of the ACHAR, including an Aboriginal Focus Group (AFG) meeting. All RAPs who responded through consultation were in support of the proposed archaeological management methodology included in the ACHAR.

The ACHAR identified two areas of PAD that are outside the Project area, near Belmore and Punchbowl Stations. The ACHAR required that the rest of the Sydenham to Bankstown corridor will be managed under the Sydney Metro Unexpected Heritage Finds Procedure. The ACHAR will be implemented in accordance with REMM AH2 if unexpected Aboriginal objects were located within the project area.

5.1.2. Human remains

If suspected human remains or burial sites are identified, the Sydney Metro Exhumation Management Plan will be implemented in accordance with CoA E15, E16 and E17 and REMM NAH19. In accordance with CoA E17, the Sydney Metro Exhumation Management Plan will be implemented for the duration of the Project's Construction's activities.

The Sydney Metro Exhumation Management Plan has been prepared to satisfy the requirements of CoA E15.

Works will immediately cease in that area. The discoverer will immediately notify machinery operators so that no further disturbance of the remains will occur, as well as notify the foreman/site supervisor, HSE JV, Forensic Anthropologist, Primary Excavation Director and Sydney Metro Environmental Representative. The Sydney Metro Exhumation Management Plan will be enacted. Preliminary notification to the NSW Police will be undertaken by the Sydney Metro Environmental Manager.

Once confirmation is received from the Forensic Anthropologist or Primary Excavation Director that the remains are of human origin, there are three possible statutory pathways to follow based on the assessment. Refer to the Sydney Metro Exhumation Management Plan.

No works to recommence until clearance is provided by Heritage NSW, and/or the NSW Police as per the documented in the Sydney Metro Exhumation Management Plan.

5.1.3. Unexpected finds

In accordance with CoA E15 and REMM NAH14, Sydney Metro has prepared the Sydney Metro Unexpected Heritage Finds Procedure (SM-18-00105232) (attached to Appendix D). In accordance with CoA E17, the Sydney Metro Unexpected Heritage Finds Procedure will be implemented for the duration of the Project's Construction's activities.

In accordance with REMM NAH18, following the discovery of new finds of Aboriginal objects – works will cease in the immediate area and the area secured. Assessment of the site/object and subsequent management of the site will be carried out in accordance with the Sydney Metro Unexpected Finds Procedure. The use of the Sydney Metro Unexpected Finds Procedure will satisfy the requirement in E15, E16 and E17 to include measures to manage an unexpected find in the HMP.

All new sites will be recorded on standard Aboriginal Heritage Information Management System (AHIMS) site cards and lodged with Heritage NSW.

5.1.4. Clearance

A written clearance confirmation will be provided by the Project Archaeologist to HSE JV once Aboriginal archaeological management has been completed in an area. This will be signed off by Sydney Metro before works recommence. Construction will continue under the Sydney Metro Unexpected Heritage Finds Procedure.

5.1.5. Reporting

Upon completion of any unexpected finds reporting and the implementation of any required mitigation measures, post excavation reporting in accordance with the Heritage NSW, DPC Aboriginal requirements will be undertaken within two years of the completion of the Project's archaeological works. The post-excavation report to be prepared by the Aboriginal Archaeologist in consultation with the RAPs. RAPs will review the draft report prior to finalisation.

5.2. Built heritage management

5.2.1. Design Requirements

This Project is a construct-only project and detailed design has been completed by others. Design requirements have been met in the design phase and are not applicable to this HMP. As outlined in Section 2, a number of heritage reports have been prepared during detailed design and the relevant mitigations therein have been incorporated into this Plan. Detailed HIAs were prepared for all stations which included an impact tracker for detailed design as well as detailed management and mitigation measures responding to the Stage 3 design. These measures have been considered in the plan where appropriate and have been included in the management action checklist (refer to Table 13).

5.2.2. Conservation/Heritage Architect

Work methodologies undertaken where heritage items will be directly impacted will be carried out with the oversight of a conservation/heritage architect in accordance with REMM NAH20.

The architect will also be available to advise HSE JV during construction and work with the skilled tradespeople, Heritage Consultant and heritage engineer to facilitate good heritage outcomes.

5.2.3. Archival Photographic Recording

Archival photographic recording of Marrickville Station, Canterbury Station and Lakemba Station has been undertaken by Sydney Metro according to the methodologies of the following documents as specified in CoA E10 and E12 and REMM NAH13:

- NSW Heritage Council guideline "Photographic Recording of Heritage Items Using Film or Digital Capture" (2006); and
- NSW Heritage Office publication "How to Prepare Archival Records of Heritage Items" (1998).

In accordance with CoA E10, archival recording undertaken at each station will be captured within the Heritage Report prepared for the Project.

As outlined in Section 2, archival recording requirements have been met during the detailed design phase and are not applicable to this HMP.

5.2.4. Heritage Interpretation

In accordance with CoA E13, Sydney Metro prepared the Sydney City and Southwest: Sydenham to Bankstown Line Heritage Interpretation Strategy and issued this for information to DPE on 3 June 2020. In accordance with CoA E14, individual Heritage Interpretation Plans have been prepared for each station precinct as part of the Sydney Metro Sydenham to Bankstown upgrade detailed design process. The Heritage Interpretation Plans will be implemented at the Project’s stations to reflect detailed design. As outlined in Section 2, these requirements have been met during the detailed design phase and are not applicable to this HMP.

5.2.5. Adaptive reuse

As outlined in Section 2, an Adaptive Reuse Strategy has been prepared for the Sydney Metro Sydenham to Bankstown Project and was considered during the project’s detailed design. This requirement has been met during the detailed design phase and is not applicable to this HMP.

5.2.6. Moveable heritage

In accordance with REMM NAH7, Sydney Metro prepared the *City and Southwest Movable Heritage Strategy* after consultation with and seeking moveable heritage registers from Sydney Trains. Movable heritage items listed in the Sydney Metro *City and Southwest Movable Heritage Strategy* are listed in Table 10, Table 11 and Table 12 below for each station. Where a movable heritage item is required to be removed in order to undertake the proposed works at a station, the methods of relocation, storage and reinstatement outlines of the Strategy will be followed.

Table 10: Marrickville Station moveable heritage

Sydney Trains Registration number	Description of object	Location within station	Sydney Trains Significance/ Condition (2019)	Artefact Significance/Condition (2020)
MKV-0009	Metal sign – “Tickets Available”	Cleaner’s Store, Platform 1 Station Building	Moderate/ Good	Moderate/ Good
MKV-0010	Cast Iron Safe - White	Platform 2 Booking Office	Moderate/ Good	Moderate/ Good

Table 11: Canterbury Station moveable heritage

Sydney Trains Registration number	Description of object	Location within station	Sydney Trains Significance/ Condition (2019)	Artefact Significance/Condition (2020)
CBY0001	Timatic Clock 'SRA of NSW'	Overhead Booking Office	High / Good	High / Good
SM CBY0002	Cast Iron Safe and Drop Box	Overhead Booking Office	Not assessed by Sydney Trains	Little to Moderate / Good

Table 12: Lakemba Station moveable heritage

Sydney Trains Registration number	Description of object	Location within station	Sydney Trains Significance/ Condition (2019)	Artefact Significance/Condition (2020)
LAK0001	Cast Iron Safe	Platform 1/2 building	Moderate / Good	Moderate / Good
LAK0002	Concrete Floor Safe	Platform 1/2 building	Little / Good	Little / Good
LAK0003-1	Box of Booking Office Ephemera - contents	Overhead Booking Office	Moderate / Good (assessment of LAK0003)	Moderate / Good
LAK0003-2	Box of Booking Office Ephemera - contents	Overhead Booking Office	Moderate / Good (assessment of LAK0003)	Moderate / Good
LAK0003-3	Box of Booking Office Ephemera - contents	Overhead Booking Office	Moderate / Good (assessment of LAK0003)	Moderate / Good
LAK0003-4	Box of Booking Office Ephemera - contents	Overhead Booking Office	Moderate / Good (assessment of LAK0003)	Little / Good
LAK0004	Station Manager's Office Sign	Overhead Booking Office	Moderate / Good	Moderate / Good
LAK0005	Staff Awards	Overhead Booking Office	Little / Good	Little / Good

5.2.7. Significant fabric register

As outlined in Section 2, a significant fabric register has been prepared and was considered during detailed design. A salvage register was prepared based on identification of significant fabric and a number of elements have been required for salvage for the Project stations. This requirement has been met at the design phase and is not applicable to this HMP.

5.2.8. Works methodologies

In accordance with REMM NAH15, where work activities are likely to impact upon built heritage (as outlined in Table 8) HSE JV will ensure methodologies for the removal of existing structures and construction of new structures will be developed and implemented during construction to minimise direct and indirect impacts to other elements within the curtilages of the heritage items, or to heritage items located in the vicinity of works. The methodology will be prepared by the nominated Heritage Consultant where required and provided to HSE JV and Sydney Metro.

5.2.9. Heritage Engineer

A heritage engineer will be consulted regarding any significant structural issues (where required). This may be required regarding the rebuilding of the parapet wall at Canterbury and works on the Canterbury overbridge.

5.2.10. Skilled tradespeople

In accordance with REMM NAH20, appropriately skilled tradespeople with experience working on heritage sites will be used for all works to conserve, protect or remove significant fabric. This includes works within the station buildings that involve the reuse, conservation or maintenance of significant fabric such as masonry, stonework, interiors and flooring. HSE JV will notify Sydney Metro of the tradespeople nominated for the works. A heritage architect will be nominated for the Project in accordance with REMM NAH4, and this architect will be available to consult with the nominated tradesperson.

5.2.11. Exclusion zones

Physical exclusion zones, including hoarding or screening, will be provided where the Project works are to be undertaken near significant elements/fabric that is not approved to be impacted. In accordance with NAH16 exclusion zones are to be applied to protect fabric during construction works carried out at:

- Marrickville Railway Station Group;
- Canterbury Railway Station Group; and
- Lakemba Railway Station Group.

Where works will be undertaken adjacent to a heritage item but not within the heritage curtilage, the exclusion zones will primarily be limited to identifying the nearby items on the environmental control map. As a minimum this will apply to the following heritage items:

- Stone house, including interiors;
- Sewage Pumping Station 271;
- Federation Post Office Building (former Canterbury Post Office);
- Inter-War Hotel (former Hotel); and
- Old Sugarmill.

5.2.12. Works on significant fabric

HIAs were prepared by Artefact Heritage during the stations' detailed design. The HIA includes detailed recommendations on the management of significant fabric including station buildings, bridges and platforms. These recommendations have been included in the management measures action checklist (refer to Table 13) and will be adhered to during construction by HSE JV.

5.2.13. Heritage Consultant advice

HSE JV will nominate a suitably qualified Heritage Consultant to advise on works during construction regarding removal, reinstatement and conservation of significant fabric. The Heritage Consultant may be required to provide advice, to monitor heritage works and to report on the outcome of works. The Heritage Consultant would work with the Conservation Architect and utilise their specialist skills were needed.

5.2.14. Landscape plan

Planting along the eastern boundary of the Canterbury Bowls Club (adjacent to the Sugarmill site) should be reinstated if trees are impacted for the site compound in accordance with NAH11. HSE JV will prepare and implement the Landscape Plan should their activities result in impacts on the existing trees on the eastern edge of the site.

5.3. Non-Aboriginal archaeological management

5.3.1. Archaeological Zoning

The AARD divided the Project into archaeological management zones based on archaeological potential and construction impacts.

Archaeological management zone mapping depicted at Marrickville Station (Figure 5), Canterbury Station (Figure 7) and Lakemba Station (Figure 9) is based on a 'traffic light' coding:

- Red (Zone 1): Direct impact to significant archaeology. Archaeological investigation is required prior to any construction impacts (bulk excavation etc.);
- Amber (Zone 2): Potential impact to significant archaeology. Prepare Work Stage Specific Archaeological Method Statement (AMS) once construction methodology and impacts are known. Archaeological investigation is likely required; and
- Green (Zone 3): Unlikely to contain significant archaeology. Construction to proceed with Sydney Metro Unexpected Finds Procedure as nil-low potential for significant archaeological remains.

5.3.2. Archaeological Management

Archaeological management will be undertaken in accordance with the works specific AMS documents and in accordance with the archaeological management zoning and AARD (refer to Figure 5, Figure 7 and Figure 9). Archaeological Method Statement.

An AMS has been prepared for the Project prior to sub-surface impacts within Red (Zone 1) and Amber (Zone 2) archaeological management zones as mapped in Figure 5, Figure 7 and Figure 9. The AMS includes management for works within the defined areas of archaeological potential at Marrickville, Canterbury, and Lakemba Stations that will be impacted, as well as the procedure for managing unexpected archaeological finds. The AMS includes details on archaeological potential and significance based on the AARD with additional information related to the subject site as required. It includes a methodology for archaeological management such as archaeological monitoring or test/salvage excavation in accordance with the AARD approved methodology. In accordance with REMM NAH12 the AMS also includes a methodology for analysis of heritage items, archaeological and artefact management strategies and a sieving strategy.

The AMS includes detailed management for the Canterbury Bowling Club compound site which is within an area of moderate to high archaeological potential for local and State significant archaeology. If subsurface impacts were proposed archaeological monitoring or salvage excavation may be required.

5.3.3. Excavation Directors

Before excavation of archaeological management sites, HSE JV will nominate a suitably qualified Excavation Director (ED) who complies with the Heritage Council of NSW's *Criteria for Assessment of Excavation Directors* (September 2019) to oversee and advise on matters associated with historic archaeology and advise DPE and Heritage NSW. Where impacts on State significant archaeology are proposed, such as at the Canterbury compound site an ED who meets the criteria for managing State significant archaeology will be required.

Roles and responsibilities are discussed in Table 5.

5.3.4. Unexpected finds

In accordance with CoA E15 and E16 and REMM NAH 14 and NAH18, unexpected non-Aboriginal archaeological finds will be managed under the Sydney Metro Unexpected Heritage Finds Procedure (see Appendix D). In accordance with CoA E17, the Sydney Metro Unexpected Heritage Finds Procedure will be implemented for the duration of the Project's Construction's activities.

An archaeological find will be unexpected if it was not identified in the AARD or the AMS as a class or type of possible remain, or if it was identified as locally significant but was assessed, after identification, as being of State significance.

The Sydney Metro Unexpected Heritage Finds Procedure complies with Section 146 of the Heritage Act 1977, Notification of discovery of relic:

A person who is aware or believes that he or she has discovered or located a relic (in any circumstances, and whether or not the person has been issued with a permit) must: (a) within a reasonable time after he or she first becomes aware or believes that he or she has discovered or located that relic, notify the Heritage Council of the location of the relic, unless he or she believes on reasonable grounds that the Heritage Council is aware of the location of the relic, and (b) within the period required by the Heritage Council, furnish the Heritage Council with such information concerning the relic as the Heritage Council may reasonably require.

Notification under s146 of the Heritage Act 1977 will only be required if the relic was unexpected.

If unexpected finds were found to be of local or State significance and were to be impacted, an AMS will be required prior to management and mitigation being undertaken.

5.3.5. Clearance

A written clearance confirmation will be provided by the Primary Excavation Director to HSE JV once archaeological management has been completed in an area. This will be signed off by Sydney Metro before works recommence. Construction will continue under the Sydney Metro Unexpected Finds Procedure (refer to Appendix D).

5.3.6. Human Remains

If suspected human remains are identified, the Sydney Metro Exhumation Management Plan will be implemented in accordance with CoA E15, E16 and E17 and REMM NAH19. It is not expected that human remains will be found as no potential burials were identified during research into the EIS and SPIR. In accordance with CoA E17, the Sydney Metro Exhumation Management Plan will be implemented for the duration of the Project's Construction's activities.

Works will immediately cease in that area. The discoverer will immediately notify machinery operators so that no further disturbance of the remains will occur, as well as notify the foreman/site supervisor, HSE JV, project archaeologist and Sydney Metro Environmental Representative. The Sydney Metro Exhumation Management Plan will be enacted. Preliminary notification to the NSW Police will be undertaken by the Sydney Metro Heritage Program Manager.

Once confirmation is received from the technical specialist that the remains are of human origin, there are three possible statutory pathways to follow based on the assessment. Refer to the Sydney Metro Exhumation Management Plan.

No works to recommence until clearance is provided by Heritage NSW, DPC and/or the NSW Police as per the Sydney Metro Exhumation Management Plan.

5.3.7. Storage of archaeological remains

Where possible artefact cleaning and preliminary cataloguing will occur on site, otherwise artefacts will be catalogued and stored off site at a location approved by Sydney Metro. Details on proposed sampling and analysis are provided in the AMS document in accordance with the AARD. The nominated Heritage Consultant would create the artefact catalogue under the oversight of the Primary Excavation Director.

5.3.8. Analysis and reporting

In accordance with CoA E11, the Historical Archaeological Excavation Report (as part of the Heritage Report) will be prepared in accordance with the standard requirements of an Excavation permit issued by the Heritage Council, and include:

- An executive summary of the archaeological programme.
- Due credit to the client paying for the excavation, on the title page.
- An accurate site location and site plan (with scale and north arrow).
- Historical research, references and bibliography.
- 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.
- Nominated repository for the items.
- Detailed response to research questions (at minimum those stated in the approved Research Design).
- Conclusions from the archaeological programme. The 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 comparable archaeological sites in the local area and any relevant recommendations for the future management of the site information and artefacts; and
- Details of how this information about this excavation has been publicly disseminated (for example provide details about Public Open Days and include copies of press releases, public brochures and/or information signs produced to explain the archaeological significance of the site).

In accordance with CoA E11 and E12, the Historical Archaeological Excavation Report will be prepared in consultation with Heritage NSW following the completion of the Sydenham to Bankstown Upgrade project works and submitted to the Planning Secretary, Heritage NSW for information within two years of completion of the Sydenham to Bankstown Upgrade project works.

5.4. Heritage awareness training and induction

All relevant personnel and contractors involved in the Project will be advised of the relevant heritage considerations and legislative requirements and cultural awareness training will be undertaken for all, including those involved with ground disturbing activities, which will include the following as relevant:

- Information on heritage significance;
- Information on the Aboriginal archaeological and cultural heritage values of the Project;
- The location and type of archaeological sites within the Project and give instructions not to disturb these sites;
- Clear information about statutory obligations for heritage in accordance with the NSW National Parks and Wildlife Act 1974 (NP&W Act). It is important to note that failure to report a discovery and those responsible for the damage or destruction occasioned by unauthorised removal or alteration to a site or to archaeological material may be prosecuted under the NP&W Act (as amended);
- How to identify stone artefacts and other Aboriginal heritage sites; and
- Stop works and reporting protocols for the discovery of previously unknown heritage and archaeological items.

All relevant personnel and contractors involved in the Project will be advised of the relevant heritage considerations, legislative requirements and recommendations in the Non-Aboriginal Heritage Impact Assessment (Artefact Heritage 2012; 2015).

All personnel involved with ground disturbing activities are made aware of their obligations to avoid any impact on non-Aboriginal heritage under the Heritage Act 1977:

- This will include information on historic heritage sites and 'relics' and information about statutory obligations under the NSW Heritage Act 1977;
- This will also include information on the potential for human skeletal remains and the requirements of the Sydney Metro Exhumation Management Procedure;
- Information relating to the nature of works and potential impacts via pre-starts at the start of activity; and
- Information about appropriate storage of materials, for example within designated laydown zones and only brought in when ready to install.

All training and toolbox meetings will be recorded by HSE JV. All project documentation, including environmental compliance and training records, will be kept as objective evidence of compliance with environmental requirements.

Further details regarding staff induction and training are outlined in Section 3.5 of the CEMP.

5.5. Ongoing notifications – unexpected finds

The following protocol will be followed with respect to ongoing notifications.

- For all unexpected heritage finds HSE JV's Environmental Manager shall notify the Environmental Representative and Sydney Metro Senior Heritage Advisor in accordance with the Sydney Metro Unexpected Finds Procedure;
- Notification under s146 will only be required if the relic was unexpected and will apply to relics of State significance;
- For unexpected Aboriginal archaeological finds, RAPs will be notified immediately;
- Notification to the RAPs will occur within 1 week where changes to the Project are identified that may have implications for Aboriginal heritage management (such as changes in design);
- Feedback requested from the RAPs should be received within two weeks and no later than four weeks from the date correspondence is issued; and
- The appropriate address and format for responses should be provided as part of the request. Where no response is issued within this timeframe, a follow-up phone call will be made by HSE JV's Environmental Manager (or project Heritage Specialist) to close out the outstanding request.

All notification and consultation records will be kept by HSE JV and its relevant consultants.

6. Management action checklist

The management actions in Table 13 are a quick reference to management required under the CoA, REMMS and recommendations of the HIAs prepared during detailed design.

Table 13: Management action checklist

Management Action	Timing	Responsibility	Description of Management	Location
General actions				
Undertake weekly inspections and monitoring of construction activities to ensure compliance with the requirements of the CoA and this plan.	Weekly during construction	Environmental Manager, or delegate	<ul style="list-style-type: none"> Undertake weekly inspections and monitoring of construction activities to ensure compliance with the requirements of the CoAs and this plan. 	All stations
Daily inspections of controls will be undertaken by Supervisors during works.	Daily during construction	Site Supervisors	<ul style="list-style-type: none"> Complete daily inspections of the controls during works. 	All stations
All relevant personnel and contractors involved in the design and construction of the Project must be advised of the relevant heritage considerations, legislative requirements and commitments.	Pre-construction	Environmental Manager, or delegate Archaeologist	<ul style="list-style-type: none"> Ensure all personnel involved in earthworks or any type of disturbance are appropriately trained / inducted and made aware of the cultural significance of the area, including site identification and materials likely to be uncovered. Personnel will be instructed to notify the Environmental Manager in the event they identify any object which they believe to be of archaeological or cultural origin. 	All stations
Where impacts are identified outside the Project area	During construction	Environmental Manager, or delegate	<ul style="list-style-type: none"> Non-compliance procedures outlined in the CEMP. Where practicable avoid additional impacts or confirm appropriate mitigation measures. Ensure that Consistency Assessments are undertaken for any new impact areas and approval sought from Sydney Metro, as outlined in the CEMP. <p>Further consultation with RAPs will be required where a Consistency Assessment identifies additional impacts to Aboriginal heritage. The Consistency Assessment will outline appropriate mitigation measures.</p>	All stations

Management Action	Timing	Responsibility	Description of Management	Location
Aboriginal stakeholder identification (RAP) and contact details in case of unexpected finds.	Pre-construction	Environmental Manager, or delegate Archaeologist	<ul style="list-style-type: none"> Identify RAPs (Appendix B). Contact RAPs in accordance with the Sydney Metro Unexpected Finds Procedure in the case of unexpected finds of an Aboriginal object or potential Aboriginal human skeletal remains and/or Aboriginal burials. RAPs should be consulted prior to test or salvage excavation commencing in accordance with the project ACHAR and should be given the opportunity to participate in any excavation works in accordance with the ACHAR. 	All stations
Nomination of an Excavation Director	Pre-construction	Environmental Manager	<ul style="list-style-type: none"> Before excavation of archaeological management sites, a qualified Excavation Director (ED) will be nominated who complies with the Heritage Council of NSW's Criteria for Assessment of Excavation Directors (September 2019) in accordance with the AARD. DPE and Heritage NSW shall be advised of the nominated ED. 	All stations
Preparation of AMS	Pre-construction	Excavation Director	<ul style="list-style-type: none"> A works specific AMS will be prepared for this Project in accordance with the excavation methodology outlined in the AARD (NAH12). The AMS will be signed off by the Primary Excavation Director and will be prepared in consultation with the Environmental Representative. The AMS should note archaeological management required in the Canterbury Station compound site (Canterbury Bowls Club) where State significant archaeology may be present. 	All stations
Archaeological management	Construction	Excavation Director	<ul style="list-style-type: none"> Non-Aboriginal archaeological management is to be undertaken in accordance with the AARD and AMS. Zoning for the Project is shown in Figure 5, Figure 7 and Figure 9. Archaeological management will be undertaken in those portions of identified archaeological management zones at Marrickville, Canterbury, and Lakemba Stations. Details of the required management will be outlined in the AMS. 	All stations
Notification and management of relics	Construction	Excavation Director	<ul style="list-style-type: none"> If any potential relics are located the ED will assess the significance of the find and provide advice. If relics are of local or State significance and are not identified in the AARD or AMS the Heritage NSW will be notified under s146 of the NSW Heritage Act. 	All stations

Management Action	Timing	Responsibility	Description of Management	Location
Site clearance after archaeological management has been completed	Construction	Excavation Director	<ul style="list-style-type: none"> Site clearance will be required from the project archaeologist prior to construction commencing. This clearance will be in the form of a memo or email and will apply to a work specific area or the project sites as a whole, depending on stage of works. 	All stations
Unexpected finds procedures for Aboriginal objects.	Construction	Archaeologist	<ul style="list-style-type: none"> Following the discovery of previously unrecorded Aboriginal objects – works will cease in the immediate area and the area secured in accordance with the Sydney Metro Unexpected finds Procedure which in accordance with CoA E15, E16 and E17 and REMM AH5, NAH14 and NAH18. Assessment of the site/object and subsequent management of the site will be carried out in accordance with the Sydney Metro Unexpected Finds Procedure and the ACHAR (REMM AH2). In addition, the site will be recorded on standard AHIMS site cards and lodged with Heritage NSW . Upon completion of any unexpected finds reporting and required mitigation measures, post excavation reporting in accordance with the Heritage NSW Aboriginal heritage requirements will be undertaken within two years of the completion of the Project. Post-excavation report to be prepared by the Aboriginal archaeologist in consultation with the RAPs. 	All stations
Unexpected finds procedures for human skeletal remains.	Construction	Archaeologist	<ul style="list-style-type: none"> Works will immediately cease in that area. The discoverer will immediately notify machinery operators so that no further disturbance of the remains will occur, as well as notify the foreman/site supervisor, HSE JV, project archaeologist and Sydney Metro Environmental Representative (CoA E17, REMM NAH14, AH5, and NAH19). The Sydney Metro Exhumation Management Plan (CoA E15) will be enacted. Preliminary notification to the NSW Police will be undertaken by the Sydney Metro Heritage Program Manager. Once confirmation is received from the technical specialist that the remains are of human origin, there are three possible statutory pathways to follow based on the assessment. Refer to the Sydney Metro Exhumation Management Plan. No works to recommence until clearance is provided by Heritage NSW and/or the NSW Police as per the protocol outlined in the Sydney Metro Exhumation Management Plan. 	All stations

Management Action	Timing	Responsibility	Description of Management	Location
Conservation architect	During construction	Environmental Manager Conservation Architect	<ul style="list-style-type: none"> A heritage conservation architect will be consulted where impacts on heritage items are proposed in accordance with NAH20. This will generally be in relation to reviewing work methodologies and advising on managing and minimising impacts to significant fabric within the station buildings. 	All stations
Heritage Engineer	During construction	Environmental Manager Heritage Engineer	<ul style="list-style-type: none"> Where significant impacts on fabric are proposed, a heritage engineer will be consulted in regard to any structural issues, where required. 	All stations
Skilled tradespeople	During construction	Project Manager Environmental Manager	<ul style="list-style-type: none"> Appropriately skilled tradespeople will be used for works that will impact significant fabric. This includes works within the station buildings that involve the reuse, conservation or maintenance of significant fabric such as masonry, stonework, interiors and flooring. HSE JV will notify Sydney Metro of the tradespeople nominated for the works. 	All stations
Moveable Heritage	Pre-construction During construction	Environmental Manager Heritage Consultant	<ul style="list-style-type: none"> Identified movable heritage items to be impacted are listed in Section 5.2.6. Where a movable heritage item is required to be removed in order to undertake the proposed works at a station, the methods of relocation, storage and reinstatement outlined in the Movable Heritage Strategy should be followed. 	All stations
Identification of a significant fabric	Pre-construction During construction	Environmental Manager Heritage Consultant	<ul style="list-style-type: none"> Significant fabric has been identified in the station specific Significant Fabric Registers. Where significant fabric is to be impacted appropriate management should be undertaken in accordance with the salvage strategy and the recommendations of the heritage impact assessments for design as outlined below. Specific fabric which will be impacted by the Stage 3 design has been included in the Heritage Salvage Strategy 	All stations
Salvage of significant fabric	Pre-construction During construction	Environmental Manager Heritage Consultant	<ul style="list-style-type: none"> Salvaged elements identified in the Heritage Salvage Strategy should be carefully salvaged, transported and stored in a safe and weather-proofed location, in keeping with the requirements of this report. Salvaged elements should be labelled to identify the origin of the element (i.e., station, building number, room designation), or where large volumes of material are salvaged (e.g., platform coping brick) 	All stations

Management Action	Timing	Responsibility	Description of Management	Location
			<p>these should be transported and stored in separately to avoid intermixing of materials from different locations.</p> <ul style="list-style-type: none"> Where significant fabric identified for salvage is found to be contaminated or affected by insects it should be disposed of in accordance with environmental control measures. 	
Storage of salvaged fabric	Pre-construction During construction	Environmental Manager Heritage Consultant	<ul style="list-style-type: none"> All salvaged materials to be re-used during construction for the Project will be stored on site and will be the responsibility of HSE JV to ensure their condition and security during works. All salvaged items will be affixed with removable labels to identify their provenance and stored in a safe and weatherproof environment. 	All stations
Vibration monitoring	During construction	Environmental Manager	<ul style="list-style-type: none"> Vibration monitoring will be undertaken in accordance with the Project's Noise and Vibration Management Plan. 	All stations
Removal of brick coping on the platforms	During construction	Heritage Consultant	<ul style="list-style-type: none"> That brick coping is removed along a single continuous horizontal line between brick coursework for the length of each platform, to ensure that a clean horizontal course of brick is preserved before the interface with new fabric above. 	All stations
Conduit installations in the platform	During construction	Environmental Manager Heritage Consultant	<ul style="list-style-type: none"> That proposed conduits to be installed in the below-platform cavity are covered or painted in matte, recessive or neutral colours, to minimise their visibility. The installation of a removable screening panel over the conduit cavity, also painted in matte, recessive or neutral colours, should be considered, to conceal services located within while still allowing access for maintenance That conduits, cabling or new structures are not installed over or on to any lower remnants of original brick fabric 	All stations
Platform ventilation shafts	During construction	Environmental Manager Heritage Consultant	<ul style="list-style-type: none"> Platform modification works should not impact, cover or remove any existing subfloor ventilation. Should platform grading be proposed which will cover these vents, small spacings should be kept open. 	All stations
Subfloor archaeology	During construction	Environmental Manager	<ul style="list-style-type: none"> Subfloor ground disturbance for these works should be managed under relevant provisions of the project Archaeological Research Design (AARD). 	All stations

Management Action	Timing	Responsibility	Description of Management	Location
		Excavation Director		
Subfloor ventilation	During construction	Environmental Manager Heritage Consultant	<ul style="list-style-type: none"> The installation of the suspended concrete slab on concrete piers should ensure that the subfloor cavity around the perimeter of each room is left open to ensure passive ventilation. Subfloor ventilation grates should be protected to prevent inadvertent damage during floor replacement works. 	All stations
Repair of significant fabric	During construction	Environmental Manager Heritage Consultant Conservation Architect	<ul style="list-style-type: none"> Repainting works should follow relevant guidelines in Heritage Paint Schemes (RailCorp 2013). Protocols for repainting should match the existing colour scheme present at the station. Brickwork which is modified should be repointed following the completion of works as necessary, to ensure a clean and consistent external appearance. Where the brickwork to the platform station buildings includes a red stain to the mortar and tuck pointing. Ensure that the original condition is maintained and restored, as appropriate, where damage has occurred. New ceilings, lighting, flooring and proposed interior window coverings should be carefully detailed to avoid impacting significant fabric (such as door and window frames, panels, lintels and skirting boards and cornices). Where works require the removal of existing intrusive fabric that adjoins original fabric (interior walls, services), the removal of the element should be conducted by hand to mitigate any potential heritage impact. During renovation works, any damaged and deteriorating original fabric should be restored and refreshed. Where a timber element is damaged, remove the entire thickness of the damaged area and geometrically splice in a matching section to the same thickness, shape, profile, form and species of the original timber. Ensure that complementary coloured glass in colour and type is utilised in the top lights to the window sashes by replacing all non-coloured glass in the panes originally intended as coloured glass. 	All stations
Installation of services	During construction	Environmental Manager	<ul style="list-style-type: none"> Existing penetrations into original fabric should be utilised where introduced fabric (new services and equipment) is to be located. Any existing penetrations that will not be utilised for new works should be 	All stations

Management Action	Timing	Responsibility	Description of Management	Location
		Heritage Consultant	<p>repaired and made good. A suitably qualified heritage tradesperson should be engaged to complete these works.</p> <ul style="list-style-type: none"> Above ground conduit installation should endeavour to use existing penetrations and entry points to structures. Conduits should not cover significant fabric or areas of detailing wherever possible. Conduits and conduit casings should not introduce large noticeable structures or items in areas of significant detailing or within significant view lines. During detailed design, conduit works should adhere to the principles and guidelines outlined in the <i>Heritage Technical Note, Installation of New Electrical and Data Services at Heritage Sites</i> (Sydney Trains, 2017) to prevent minor cumulative impacts to fabric from occurring due to ad hoc conduit design solutions. Conduit design solutions should avoid ad hoc solutions which can cause further physical and visual impacts to heritage significant fabric. New Combined Services Route (CSR) and Galvanised Steel Troughing (GST) will increase visual clutter. Prior to the commencement of the Sydney Metro service operation, redundant Sydney Trains GST should be removed to minimise the impact of new services in the station area. 	
Illawarra Road Overbridge	During construction	Environmental Manager Heritage Consultant	<ul style="list-style-type: none"> The installation of new conduits should utilise existing penetrations within the brickwork, while the conduits should be painted dark grey or brown to reduce the visual dominance of the structures. The removal of the existing vertical anti-throw screen on the eastern side of the overbridge should be done carefully by hand to reduce the adverse impact additional machinery may cause to the original brick capping of the parapet wall. Bullnose brick capping and any other impacted brickwork be made good prior to the installation of the new vertical protection screens. The proposed vertical protection screens for both sides of the overbridge should remain consistent in the form and design between sections. It is noted a final colour and material scheme has not been provided. To mitigate future adverse impacts, it is recommended that any new material and/or colour scheme should be clear and untinted to ensure minimal visual disruption. The proposal includes the introduction of a compressive filler material to be located between the proposed steel beam and the existing brick masonry of the parapet wall. It is recommended that the new material be sympathetically installed to retain the integrity of the fabric it adjoins. 	Marrickville Station

Management Action	Timing	Responsibility	Description of Management	Location
			<p>Furthermore, during installation, splash protection (geofabric or other protective materials) should be overlaid over the brickwork to ensure that the compressive filler material does not impact the brickwork.</p> <ul style="list-style-type: none"> • Opportunities for the removal of the existing paintwork and the repointing of the brick parapet walls should be explored. These works could enhance the legibility and integrity of the Illawarra Road overbridge. A heritage professional specialising in masonry repointing should be consulted as part of these works. 	
Marrickville former men's bathroom	During construction	Environmental Manager Heritage Consultant	<ul style="list-style-type: none"> • Repair of the timber partition walls in platform 2 building former men's bathroom should aim to conserve as much original timber as possible. Where a timber element is damaged, the damaged area should be removed entirely and a matching section to the same size, shape, profile, form and species of the original timber should be installed to replace. 	Marrickville Station
Canterbury Road overbridge and underbridge	During construction	Environmental Manager Heritage Consultant	<ul style="list-style-type: none"> • Prior to the commencement of deconstruction works on the Canterbury Road overbridge, detailed photographic and measured plans of parapets and retaining walls should be prepared, to assist in reconstructing masonry as accurately as possible to its original condition. • Masonry deconstruction and reconstruction should be conducted by tradespeople with demonstrated experience in managing and repairing heritage masonry, under the advice and supervision of HSE JV's heritage architect. • Salvage of brickwork should be conducted by hand as much as possible, with the least number of vertical saw cuts provided. Saw cuts should be conducted between brick courses and not through brick courses wherever possible. • Salvaged brickwork should be managed with care following removal to ensure inadvertent damage does not occur to bricks during transport and storage. • As not all bricks are expected to be salvaged intact, new replacement bricks will be required. Replacement bricks must be appropriately matched in colour, dimensions, texture, type of aggregate and the range of colour and aggregate variation to existing brick. • Brick matching should be conducted with on-site comparison of existing and replacement bricks, with a moderate sample size of replacement brick, to ensure that matching qualities are met. 	Canterbury Station

Management Action	Timing	Responsibility	Description of Management	Location
			<ul style="list-style-type: none"> Bricks should be re-laid in the original pattern and bond as the existing parapet and retaining walls, including existing angled sills and soffit courses. New brick and original brick should be installed in consolidated sections and not intermixed, so that new and original fabric can be discerned. It is recommended that salvaged brick is prioritised for bridge reconstruction above and near the platform 2 lift area, where in-station viewsheds of the masonry are most prominent. The reconstructed bridge parapet will include a new concrete support beam which will run at the base of the Canterbury Road-level brick parapets and will be clearly visible within Canterbury Station. The concrete support should be covered with at least a single course of salvaged or replacement bricks, to ensure that visual impacts to the brickwork and station precinct are lessened. Additional time should be allotted during the construction program for the reconstruction works if hand deconstruction and reconstruction is not tenable during existing possession period estimates. 	
Canterbury Station – Platform 2 lift area	During construction	Environmental Manager Heritage Consultant	<ul style="list-style-type: none"> Once the Sydney Trains operation of the Bankstown Line has been discontinued, redundant conduits and GST should be removed to reduce visual clutter. Existing PVC pipes located along the brick retaining wall should be removed to reduce visual clutter. Lighting and surveillance systems should not be installed on the brick retaining wall or reconstructed parapet and should be either separately mounted or attached to new fabric (such as the new lift shaft), to minimise physical and visual impacts to fabric and significant vistas in this area. 	Canterbury Station

7. Monitoring, auditing and reporting

7.1. Compliance

HSE JV will regularly review the Project activities to ensure compliance with this Plan. A regular inspection program for heritage management will be conducted as follows:

- Details of daily inspection undertaken by HSE JV's Site Supervisor will be logged in their respective site diaries, and maintenance will be undertaken during active site works.
- Routine weekly inspections are to be conducted by HSE JV's Environmental Manager, or delegate, to monitor heritage management and implementation of this HMP at active worksites. Weekly inspections will be documented to maintain compliance and effectiveness of controls.
- Items that require action will be documented on the site environmental inspection. Items that require specific and detailed action will be recorded on the Project's Corrective Action Register, maintained by HSE JV's Environmental Manager.

HSE JV's Construction Manager will be responsible for providing appropriate resources in terms of labour, plant and equipment to enable issues to be rectified in the nominated timeframes.

Records associated with this Plan will be maintained in accordance with Section 3.16 of the CEMP. Site inspections will be undertaken, and records maintained within HSE JV's Information Management System.

7.2. Archaeological monitoring

Archaeological monitoring of works which may impact significant archaeological remains will be undertaken in accordance with the AMS. Monitoring will be overseen by the Excavation Director.

7.3. Archaeological reporting

A preliminary results report will be prepared within two months of the completion of archaeological work. This will be prepared under the direction of the Primary Excavation Director. An excavation report will be prepared within two years of completion of the Project's archaeological excavations in accordance with CoA E12.

8. Review and improvement

Continuous improvement of this Plan will be achieved by the ongoing evaluation of environmental management performance against environmental policies, objectives and targets. HSE JV will be responsible for carrying out these routine and ongoing evaluations.

The continuous improvement process will be designed to:

- Identify areas of opportunity for the improvement of environmental management and performance;
- Determine the cause or causes of non-conformance and deficiencies;
- Develop and implement a plan of corrective and preventative action to address any non-conformances and deficiencies;
- Verify the effectiveness of corrective and preventative actions;
- Document any changes in procedures resulting from process improvement; and
- Make comparisons with objectives.

This HMP will be reviewed on a six-monthly basis and earlier if required, considering the following:

- The status and progress of The Project's activities;
- Changes in the design, delivery and operation processes and conditions;
- Lessons were learnt during delivery and operations;
- Changes in other related Project Plans;
- Requirements and matters not covered by the existing Project Plans;
- Changes to Project Plans as directed by Sydney Metro's Representative under the Deed;
- Where deemed appropriate in relation to items raised within inspections or audits;
- Lessons learnt from incidents, events or near misses;
- Feedback from Compliance Tracking Reports; and
- Feedback on Construction Monitoring Program results.

8.1. Enquiries, complaints and incident management

Environmental incidents and non-compliances associated with heritage will be managed in accordance with Section 3.10 of the CEMP.

Enquiries and complaints that relate to heritage management will be managed in accordance with the Project's Overarching Community Communication Strategy and Section 3.7 of the CEMP.

9. HMP administration

9.1. Hold points

Heritage management hold points are included within Table 14.

Table 14: HMP hold points

Item	Process Held	Acceptance Criteria	Approval Authority
Encounter of Unexpected Heritage Item	Commencement of works in the affected area	The Unexpected Finds Process as outlined in the HMP and Sydney Metro Unexpected Finds Procedure must be applied in the event of encountering unexpected/potential heritage items.	HSE JV's Environmental Manager (or delegate)
Construction identified as affecting buildings	Site activities	Building Condition Survey conducted by an appropriate professional nominated by HSE JV.	HSE JV's Construction Manager

9.2. Records

Records associated with this management plan will be maintained in accordance with Section 3.16 of the CEMP. Records relating to heritage management will include (but are not limited to):

- Inspections undertaken in relation to heritage management measures;
- Archival recordings undertaken of any heritage item;
- Unexpected finds and stop work orders; and
- Records of any impacts avoided or minimised through construction methods.

Appendix A – Revised Environmental Mitigation Measures and CEMF Requirements Relevant to this Plan

Revised Environmental Mitigation Measures relevant to development of this Plan

REMM No.	REMM Requirement	Timing	Document Reference
Non-Aboriginal Heritage			
NAH1	The project design would minimise adverse impacts to heritage buildings, elements, fabric, spaces and vistas that contribute to the overall heritage significance of the Bankstown Line.	Design/pre-construction	This Project's scope does not include design. This requirement was fulfilled during the design phases of the Sydenham to Bankstown project. Section 5.2.1 Table 13
NAH2	The project design would maximise the retention and legibility of heritage buildings, structures, fabric, spaces and vistas that are individually significant and contribute to the overall heritage significance of the Bankstown Line.	Design/pre-construction	This Project's scope does not include design. This requirement was fulfilled during the design phases of the Sydenham to Bankstown project. Section 5.2.1 Table 13
NAH3	The project design would complement retained heritage buildings, elements, fabric, spaces and vistas to avoid outcomes that compromise the significance of these heritage items	Design/pre-construction	This Project's scope does not include design. This requirement was fulfilled during the design phases of the Sydenham to Bankstown project. Section 5.2.1 Table 13
NAH4	The project design would be developed with guidance from an appropriately qualified and experienced conservation architect.	Design/pre-construction	This Project's scope does not include design. This requirement was fulfilled during the design phases of the Sydenham to Bankstown project. Section 5.2.1 Table 13
NAH5	Where significant heritage items or elements are to be retained within the operational area, an adaptive reuse strategy would be prepared by an appropriately qualified and experienced heritage architect.	Design/pre-construction	Section 5.2.5 Table 13
NAH6	A Heritage Interpretation Plan would be prepared to document the development of the Bankstown Line and detail the history of each station and	Design/pre-construction	Section 5.2.4

REMM No.	REMM Requirement	Timing	Document Reference
	its contribution to both the Bankstown Line and the surrounding suburbs. Appropriate heritage interpretation would be incorporated in the design and would provide legible connections between stations.		Table 13
NAH7	A moveable heritage item strategy would be prepared by an appropriately qualified and experienced heritage specialist in consultation with Sydney Trains, and would include a comprehensive record of significant railway elements to be impacted. This would include items contained within station and platform buildings as well as of any other significant equipment within the curtilage of the heritage railway stations. The moveable heritage item strategy would form part of the broader interpretation strategy.	Design/pre-construction	Section 5.2.6 Table 13
NAH8	Where significant buildings are to be re-purposed or refreshed: <ul style="list-style-type: none"> the inherent character of the building should be retained with new additions, including form, palette and materiality, sympathetic to its heritage values a suitably qualified and experienced heritage architect should advise on appropriate materials and finishes which would be sympathetic to the heritage values of each individual station the internal layout of the building should be retained where possible, and rooms should not be subdivided unless it can be completed without adverse impact and/or is reversible without any long-term adverse impact a significant element register should be prepared by a suitably qualified and experienced heritage architect. The register should list significant fabric, assess its condition, tolerance for change and recommend retention or salvage where fabric of high significance is to be removed, adequate assessment should be carried out that outlines impact and justification in accordance with the Statements of Heritage Impact guidelines (NSW Heritage Council 2002) 	Design/pre-construction	This Project's scope does not include design. This requirement was fulfilled during the design phases of the Sydenham to Bankstown project. Section 2.1 Section 5.2.1 Section 5.2.7 Table 13 A statement of heritage impact has been completed during the design stage along with a significant element register to satisfy this requirement.
NAH9	The design and materials used for the construction of new access stairs, concourses, canopies and lift shafts should be as sympathetic as possible to the existing character of the stations with the aim of minimising visual impacts. The design should use unobtrusive, modern, lightweight materials such as glass panelling and slim frame elements. The Design Review Panel should be consulted regarding the design, form and material of these additions.	Design/pre-construction	This Project's scope does not include design. This requirement was fulfilled during the design phases of the Sydenham to Bankstown project. Section 5.2.1 Table 13

REMM No.	REMM Requirement	Timing	Document Reference
NAH10	Where platforms are re-levelled, door thresholds and steps should be accessible without raising or relocation of entries. Sub-floor ventilation should remain open to avoid long term impacts to the structures.	Design/pre-construction	This Project's scope does not include design. This requirement was fulfilled during the design phases of the Sydenham to Bankstown project. Section 5.2.1 Table 13
NAH11	A landscape scheme would be prepared for the Old Sugarmill to re-instate planting within and close to the curtilage of the item. The scheme would consider appropriate period plants and trees. Any boundary wall treatment would be designed in consultation with a heritage architect.	Design/pre-construction	Section 5.1.14 Section 5.2.2
NAH12	The archaeological research design, including any mitigation measures identified in the Archaeological Assessment and Research Design report, would be implemented.	Design/pre-construction	Section 5.1 Section 5.2
NAH13	Photographic archival recording would be carried out in accordance with the 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).	Design/pre-construction	Section 5.2.3 Table 13
NAH14	An unexpected finds procedure would be developed and included in the construction heritage management plan.	Design/pre-construction	Section 5.1.3 Section 5.3.4 Sydney Metro Unexpected Finds Procedure (Appendix D)
NAH15	Methodologies for the removal of existing structures and construction of new structures would be developed and implemented during construction to minimise direct and indirect impacts to other elements within the curtilages of the heritage items, or to heritage items located in the vicinity of works.	Construction	Section 5.2.8 Table 13
NAH16	All retained heritage buildings, structures, fabric and moveable heritage items would be protected to avoid damage during works in the vicinity of these items, including from vibration. Retained significant buildings or elements susceptible to damage would be protected by hoardings or screens.	Construction	Section 5.2.11 Table 13
NAH17	Prior to construction commencing, a detailed inventory of all buildings, structures, fabric, spaces and vistas of heritage significance that are to be retained or removed would be prepared by appropriately qualified and experienced heritage specialists. The inventory must provide an assessment	Construction	Section 2.1 Section 5.2.7

REMM No.	REMM Requirement	Timing	Document Reference
	of the heritage impact based on the significance of each element and sub-element that comprises it and include recommendations for protection and conservation relative to the identified level of heritage significance.		
NAH18	If unexpected archaeological remains, relics, or potential heritage items are discovered during construction, all works in the immediate area would cease, and the unexpected finds procedure would be implemented.	Construction	Section 5.1.3 Section 5.3.4 Sydney Metro Unexpected Finds Procedure (Appendix D)
NAH19	If a potential burial site or potential human skeletal material is exposed during construction, the Transport for NSW Exhumation Management Plan would be implemented.	Construction	Section 5.1.3 Section 5.3.4 Sydney Metro Unexpected Finds Procedure (Appendix D)
NAH20	All works to conserve, protect or remove significant heritage fabric would be undertaken by skilled tradespeople with experience working on heritage sites, in consultation with an appropriately qualified conservation heritage architect.	Construction	Section 5.2.10 Table 13
NAH23	Prior to the removal of the Bankstown Parcels Office (former), a heritage salvage and moveable heritage register should be prepared, identifying those significant elements which can be removed and retained for potential reuse.	Design/pre-construction	The removal of Bankstown Parcels Office is not within this scope of this Project. This REMM is not relevant to this Plan.
Aboriginal Heritage			
AH1	Aboriginal stakeholder consultation would continue to be undertaken in accordance with Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECC, 2010).	Pre-construction	Consultation with RAPs was undertaken during concept design as part of the Sydney Metro Sydenham to Bankstown EIS and also during preparation of the ACHAR RAPs would be involved if Aboriginal objects were identified during excavations. Section 1.4 Section 5.1.5 Section 5.5 Section 6 Table 13
AH2	The Aboriginal Cultural Heritage Assessment Report will be implemented.	Pre-construction	There are no identified areas of Aboriginal archaeological potential or Aboriginal sites within the Project area. The ACHAR would be implemented in the event of an unexpected find.

REMM No.	REMM Requirement	Timing	Document Reference
			Section 5.1.1
AH3	Archaeological test excavation (and salvage if required) would be carried out at S2B PAD02 at Punchbowl Station. Excavations would be conducted in accordance with the methodology outlined by the Aboriginal cultural heritage assessment report.	Pre-construction	S2B PAD02 is not within the Project area therefore this measure is not relevant to this current scope of works and Plan.
AH4	Appropriate Aboriginal heritage interpretation would be incorporated into the design in consultation with Aboriginal stakeholders.	Pre-construction	Section 5.2.4
AH5	If potential Aboriginal items are uncovered during the works, all works in the immediate area would cease, and the unexpected finds procedure included in the construction heritage management plan would be implemented. During pre-work briefings, employees would be made aware of the unexpected finds procedures and obligations under the National Parks and Wildlife Act 1974.	Construction	Section 5.1.3 Sydney Metro Unexpected Finds Procedure (Appendix D)

Construction Environmental Management Framework requirements relevant to development of this Plan

CEMF Section	CEMF Requirement	Document Reference
10.1(a)	<p>The following heritage management objectives will apply to construction: Embed significant heritage values through any architectural design, education or physical interpretation. Minimise impacts on items or places of heritage value. Avoid accidental impacts on heritage items. Maximise worker’s awareness of indigenous and non-indigenous heritage</p>	<p>Significant heritage values have been embedded in the heritage interpretation design development of the Project. Section 1.3 Section 5.2.4 Section 5.2.11 Section 5.2.12 Section 5.3.2 Section 5.4</p>
10.2(b)	The Contractor’s regular inspection will include checking of heritage mitigation measures	Section 7
10.2(c)	Compliance records will be retained by the Contractor. These will include:	-
i.	Inspections undertaken in relation to heritage management measures	Section 7
ii.	Archival recordings undertaken of any heritage item	Section 5.2.3
iii.	Unexpected finds and stop work orders	Section 5.1.3 Section 5.3.4 Sydney Metro Unexpected Finds Procedure (Appendix D)
iv.	Records of any impacts avoided or minimised through design or construction methods	Section 7 Section 8
10.3(a)	Examples of heritage mitigation measures include:	-
i.	Any heritage item not affected by the works will be retained and protected throughout construction.	Section 5.2.11
ii.	During construction undertake professional archaeological investigation, excavation, and reporting of any historical Indigenous heritage sites of state significance which will be affected. Reporting may be completed as construction progresses	Section 5.1 Section 5.3
iii.	Undertake archival recordings of all non-Indigenous heritage items affected by the works prior to commencement of works	Section 5.2.3

CEMF Section	CEMF Requirement	Document Reference
iv.	Implement unexpected heritage find procedures for Indigenous and non-Indigenous heritage items.	Section 5.1.3 Section 5.3.4 Sydney Metro Unexpected Finds Procedure (Appendix D)
Table 17.4	<p>The design is sympathetic to the historic significance of existing stations, and where practicable, avoids and minimises impacts to heritage.</p> <p>The preferred project retains, and where possible, repurposes all heritage elements.</p> <p>The design and mitigation strategies are reviewed by the Sydney Metro Design Review Panel.</p> <p>Impacts on heritage are managed in accordance with relevant legislation, including the EP&A Act, the Heritage Act 1977, and relevant guidelines.</p> <p>Potential impacts are managed by mitigation measures.</p>	<p>This Project works do not include design.</p> <p>This requirement was fulfilled during the design phases of the Sydenham to Bankstown project.</p> <p>Section 5.2.1 Table 3 Table 13</p>



Appendix B – Registered Aboriginal Parties

The list of registered Aboriginal stakeholders/Registered Aboriginal Parties (RAPs) are included below:

Stakeholder
Aboriginal Archaeology Service INC
Bilinga Cultural Heritage Technical Services
DACHA
Darug Land Observations PTY LTD
Duncan Suey & Associates
Gandangara Local Aboriginal Land Council
Gundungurra Tribal Technical Services
Gunyu Cultural Heritage Technical Services
Kamilaroi-Yankuntjatjara Working Group
Metropolitan Local Aboriginal Land Council
Munyinga Cultural Heritage Technical Services
Murri Bidgee Mullangari Aboriginal Corporation
Murrumbul Cultural Heritage Technical Services
Tocomwall
Wingikara Cultural Heritage Technical Services
Woronora Plateau Gundangarra Elders Council



Appendix C – Consultation Register

Project	CSSI 8256 – Sydney Metro S2B
Document	CHMP – Marrickville, Canterbury, Lakemba Station Upgrades – Construction Heritage Management Plan
Date received from SM	17 December 2020
Date comments sent to SM	14 January 2021

Com ment No.	CoA	Requirement	Document reference	DPE comment	Project team response	Amend ment made Y/N?	Page/section	DPE Comment	Final Status
1	C1	A Construction Environmental Management Plan (CEMP) must be prepared in accordance with the Construction Environmental Management Framework (CEMF) included in the documents listed in Condition A1 to detail how the performance outcomes, commitments and mitigation measures specified in the documents listed in Condition A1 will be implemented and achieved during Construction.	Conditions of Approval SSI8256	A CEMP has been prepared to satisfy condition C1. The review of the CEMP has been prepared separate to this document. CLOSED for the purposes of the CHMP	N/A	N/A	N/A	s	N/A
2	C2	The CEMP must be endorsed by the ER and then submitted to the Planning Secretary for approval no less than one (1) month before the commencement of Construction.	ER endorsement letter	The Construction Heritage Management Plan (CHMP) was endorsed by the ER, Rui Henriques (letter dated 16.12.20). CLOSED	N/A	N/A	N/A	N/A	N/A
3	C3	The CEMP Sub-plans must be prepared in consultation with the relevant government agencies identified for each CEMP Sub-plan and be consistent with the CEMF and CEMP referred to in Condition C1 . Item d) Heritage Heritage Council (or its delegate) and Relevant Council(s).	Section 1.4 Table 2 Appendix C	A heritage sub-plan is required as part of the Construction Environmental Management Plan (CEMP) for the project under CoA C3(d) – this CHMP fulfils that requirement. The CHMP was provided to Inner West Council, City of Canterbury Bankstown and Heritage NSW for review. A summary of the consultation and responses is included in Section 1.4, Table 2 and Appendix C provides evidence of responses received from Inner West Council and Heritage NSW. Only minor comments were raised and were addressed in future revisions of the CHMP. No response was received from CoCB. It is noted that RAPs consultation was completed as part of the concept design stage of the Sydenham to Bankstown EIS and during the preparation of the ACHAR – further RAPs involvement would be predicated by the discovery of Aboriginal object identified during excavations. DPE notes that throughout the CHMP reference is made to consultation to be undertaken in the future. Future updates of the CHMP should correctly note that consultation has been undertaken.	On 24 December 2020, CoCB provided their response on the Marrickville, Canterbury and Lakemba Heritage Management Plan: <i>“Comments from Council’s Heritage Advisor, Sally Charalambides: Table 13 of the Canterbury/Lakemba HMP nominates the heritage consultant to be responsible for a range of tasks (Description of Management) that all relates to built heritage fabric. This however is to be the responsibility of a heritage architect. Please ask to have this amended accordingly.</i> <i>There were no other comments from anyone else from Council on this HMP.”</i> Section 1.4 (Table 2) and Appendix C of the HMP have been revised accordingly. Roles and responsibilities were revised throughout various sections of the HMP between Revision 00 (issued to CoCB for consultation) and Revision 02, in	Y	Section 1.4, Appendix C Table 13 (Rev03) and Table 5 / Section 5.2 (Rev02)		

Com ment No.	CoA	Requirement	Document reference	DPE comment	Project team response	Amend ment made Y/N?	Page/section	DPE Comment	Final Status
				DPE Comment 3.1: Please provide evidence of consultation attempts with CoCB Council.	response to internal comments and feedback received from IWC.				
4	C4	The CEMP Sub-plans must be prepared in accordance with the CEMF.	Section 1.1 Table 4 Appendix A	Section 1.1 of the CHMP states that the CHMP has been prepared in accordance with the CEMF. Table 4 Compliance Matrix provides details on how the HMP has been prepared in accordance with the CEMF. CLOSED	N/A	N/A	N/A	N/A	N/A
5	C5	Details of all information requested by an agency to be included in a CEMP Sub-plan as a result of consultation, including copies of all correspondence from those agencies, must be provided with the relevant CEMP Sub-Plan.	Section 2.6 Appendix C	Appendix C provides a summary of correspondence from Inner West Council and Heritage NSW. Copies of actual correspondence were also provided with submission of the CHMP. No comment was received from CoCB Council and no evidence of consultation occurring (eg emails, phone records etc) were provided. DPE Comment 5.1: Please provide evidence of attempts to consult with CoCB Council	On 24 December 2020, CoCB provided their response on the Marrickville, Canterbury and Lakemba Heritage Management Plan: “ <i>Comments from Council's Heritage Advisor, Sally Charalambides: Table 13 of the Canterbury/Lakemba HMP nominates the heritage consultant to be responsible for a range of tasks (Description of Management) that all relates to built heritage fabric. This however is to be the responsibility of a heritage architect. Please ask to have this amended accordingly.</i> <i>There were no other comments from anyone else from Council on this HMP.</i> ” Section 1.4 (Table 2) and Appendix C of the HMP have been revised accordingly. Roles and responsibilities were revised throughout various sections of the HMP between Revision 00 (issued to CoCB for consultation) and Revision 02, in response to internal comments and feedback received from IWC.	Y	Section 1.4, Appendix C Table 13 (Rev03) and Table 5 / Section 5.2 (Rev02)		
6	C6	Any of the CEMP Sub-plans may be submitted along with, or subsequent to, the submission of the CEMP but in any event, no later than one (1) month before Construction.	CHMP	This plan has been submitted to the Department for approval on 17 December 2020 concurrently with the submission of the CEMP and other sub-plans. The notified date of commencement of construction is Quarter 1, 2021. CLOSED	N/A	N/A	N/A	N/A	N/A
7	C7	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the	CHMP	The CHMP has been submitted for approval by the Secretary.	N/A	N/A	N/A	N/A	N/A

Com ment No.	CoA	Requirement	Document reference	DPE comment	Project team response	Amend ment made Y/N?	Page/section	DPE Comment	Final Status
		Planning Secretary. The CEMP and CEMP Sub-plans , as approved by the Planning Secretary, including any minor amendments approved by the ER must be implemented for the duration of Construction. Where Construction of the CSSI is staged, Construction of a stage must not commence until the CEMP and CEMP Sub-plans for that stage have been approved by the Planning Secretary.		This condition is included in the CHMP. CLOSED					
8	E10 NAH13	Following completion of Work described in the documents listed in Conditions A1 and A2 in relation to heritage items, a Heritage Report including the details of any archival recording, further historical research either undertaken or to be carried out and archaeological excavations (with artefact analysis and identification of a final repository for finds), must be prepared in accordance with any guidelines and standards required by the Heritage Council of NSW and OEH. Photographic archival recording would be carried out in accordance with the 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).	Section 5.2.3 Section 5.3.9	Section 5.2.3 states that archival photographic recording has been undertaken in accordance with the requirements of E10, E12 & REMM NAH13. Section 5.2.3 states that the archival recording undertaken as each station will be captured within the Heritage Report prepared for the project that are yet to be finalisedt. Relevant guidelines and publications are listed. REMM NAH13 is referenced. CLOSED	N/A	N/A	N/A	N/A	N/A
9	E11	An Excavation Director's Report (EDR) must be prepared for any heritage items of State significance that are discovered during Work. The EDR must be prepared in consultation with OEH.	Section 5.3.9	There is no specific reference to the Excavation Directors Report, other than when referencing the CoA. DPE Comment 9.1: Please advise the status of preparation of the Excavation Directors Report and confirm it will be prepared in consultation with Heritage NSW. The name of the nominated Excavation Director should also be provided for clarity.	Addressed Last paragraph of Section 5.3.9 has been revised to better reflect the consultation and timing requirements of CoA E11 and E12: <i>"In accordance with CoA E11 and E12, the Historical Archaeological Excavation Report will be prepared in consultation with Heritage NSW following the completion of the Sydenham to Bankstown Upgrade project works and submitted to the Planning Secretary, Heritage NSW for information within two years of completion of the Sydenham to Bankstown Upgrade project works."</i> The Excavation Director is to be nominated by the Principal Contractor once engaged. Following approval of the Marrickville, Canterbury and Lakemba CEMP and Sub-plans, the HMP will undergo a review to incorporate the Contractor's EMS/processes and nominated personnel.	Y	Section 5.3.9 Page 42		
10	E12	The Heritage Report and Excavation Directors Report must be submitted to the Planning Secretary, the Heritage Council of NSW and OEH for	Section 5.3.9	The timeframe requirements for the submission of various heritage reports are included in section 5.3.9. However, as	Addressed Last paragraph of Section 5.3.9 has been revised to better reflect the consultation and	Y	Section 5.3.9 Page 42		

Com ment No.	CoA	Requirement	Document reference	DPE comment	Project team response	Amend ment made Y/N?	Page/section	DPE Comment	Final Status
		information no later than 24 months after the completion of Work referred to in Condition E10 .		<p>noted above, there is no reference to an Excavation Directors Report.</p> <p>DPE Comment 10.1: Please advise the status of preparation of the Excavation Directors Report and confirm it will be prepared in consultation with Heritage NSW. The name of the nominated Excavation Director should also be provided for clarity.</p>	<p>timing requirements of CoA E11 and E12:</p> <p><i>"In accordance with CoA E11 and E12, the Historical Archaeological Excavation Report will be prepared in consultation with Heritage NSW following the completion of the Sydenham to Bankstown Upgrade project works and submitted to the Planning Secretary, Heritage NSW for information within two years of completion of the Sydenham to Bankstown Upgrade project works."</i></p> <p>The Excavation Director is to be nominated by the Principal Contractor once engaged. Following approval of the Marrickville, Canterbury and Lakemba CEMP and Sub-plans, the HMP will undergo a review to incorporate the Contractor's EMS/processes and nominated personnel.</p>				
11	E13	The Proponent must prepare a Heritage Interpretation Strategy which outlines a process to interpret key Aboriginal and non-Aboriginal heritage values and stories of heritage items in the final project design. The Heritage Interpretation Strategy must be prepared in consultation with the Heritage Council of NSW and submitted to the Planning Secretary for information before the commencement of Construction.	Section 5.2.4	<p>The CHMP states that a Heritage Interpretation Strategy has been prepared for the Sydney Metro Sydenham to Bankstown upgrade project (provided to DPE for information on 3 June 2020), and individual Heritage Interpretation Plans have been prepared for each station precinct by Artefact Heritage as part of detailed design. As such, this requirement has been met during design phases.</p> <p>Section 5.2.4 states that the Heritage Interpretation Plans will be implemented at the Project's stations to reflect detailed design.</p> <p>CLOSED</p>	N/A	N/A	N/A	N/A	N/A
12	E14	<p>A Heritage Interpretation Plan(s) must be prepared, consistent with the Heritage Interpretation Strategy which identifies heritage items to be used in the final design of the project. The plan(s) must identify how items will be interpreted and provide a timeframe for their implementation which must be no later than the commencement of Operation. Heritage interpretation in any station precinct must be identified in the relevant Station Design and Precinct Plan(s) required in Condition E56.</p> <p>The Heritage Interpretation Plan must be prepared in accordance with the NSW Heritage Manual, the NSW Heritage Office's Interpreting Heritage Places</p>	Section 5.2.4	<p>Section 5.2.4 states Heritage Interpretation Plans have been prepared for each station precinct by Artefact Heritage as part of detailed design. As such, this requirement has been met during design phases.</p> <p>Section 5.2.4 states that the Heritage Interpretation Plans will be implemented at the Project's stations to reflect detailed design.</p> <p>CLOSED</p>	N/A	N/A	N/A	N/A	N/A

Com ment No.	CoA	Requirement	Document reference	DPE comment	Project team response	Amend ment made Y/N?	Page/section	DPE Comment	Final Status
	NAH6	and Items: Guidelines (August 2005), and the NSW Heritage Council's Heritage Interpretation Policy. A Heritage Interpretation Plan would be prepared to document the development of the Bankstown Line and detail the history of each station and its contribution to both the Bankstown Line and the surrounding suburbs. Appropriate heritage interpretation would be incorporated in the design and would provide legible connection between stations.							
13	E15 NAH14 NAH18	An Unexpected Heritage Finds and Human Remains Procedure must be prepared to manage unexpected heritage finds in accordance with the guidelines and standards prepared by the Heritage Council of NSW or OEH. An unexpected finds procedure would be developed and included in the construction heritage management plan. In the event that unexpected archaeological remains, relics, or potential heritage items are discovered during construction, all works in the immediate area would cease, and the unexpected finds procedure would be implemented.	Section 5.1.2 Section 5.1.3 Section 5.3.5 Section 5.3.7 Appendix D	An Exhumation Management Plan has been completed by Sydney Metro separately and will be implemented where required and in accordance with the requirements of the Exhumation Management Plan. Sections 5.1.2 and 5.3.7 outline the procedures required which are in accordance with current standards of the Heritage Council and Heritage NSW. The Sydney Metro Unexpected Finds Procedure is standard procedure implemented across the entire Sydney Metro project, and has been completed separately. This procedure will be implemented for the MCL program of works. CLOSED	N/A	N/A	N/A	N/A	N/A
14	E16	The Unexpected Heritage Finds and Human Remains Procedure must be prepared by a suitably qualified and experienced heritage specialist in consultation with the Heritage Council of NSW and submitted to the Planning Secretary for information no later than one (1) month before the commencement of Construction.	Section 5.1.2 Section 5.1.3 Section 5.3.5 Section 5.3.7 Appendix D	These two procedures have been developed separately from this CHMP and will be implemented across the project for the duration of works. CLOSED	N/A	N/A	N/A	N/A	N/A
15	E17 NAH19	The Unexpected Heritage Finds and Human Remains Procedure , as submitted to the Planning Secretary, must be implemented for the duration of Construction and during Operational maintenance Work. Note: Human remains that are found unexpectedly during Work are under the jurisdiction of the NSW State Coroner and must be reported to the NSW Police immediately. In the event that a potential burial site or potential human skeletal material is exposed during construction, the Transport for NSW Exhumation Management Plan would be implemented.	Section 5.1.2 Section 5.1.3 Section 5.3.5 Section 5.3.7 Appendix D	These two procedures have been developed separately from this CHMP and will be implemented across the project for the duration of works. CLOSED	N/A	N/A	N/A	N/A	N/A
16	NAH1	The project design would minimise adverse impacts to heritage buildings, elements, fabric, spaces and vistas that contribute to the overall heritage significance of the Bankstown Line.	N/A	This Project's scope does not include design. This requirement was fulfilled during the design phases of the Sydenham to Bankstown project. CLOSED	N/A	N/A	N/A	N/A	N/A

Com ment No.	CoA	Requirement	Document reference	DPE comment	Project team response	Amend ment made Y/N?	Page/section	DPE Comment	Final Status
26	NAH12	The archaeological research design, including any mitigation measures identified in the Archaeological Assessment and Research Design report, would be implemented.	Section 5.3.3	<p>Section 5.3.3 outlines that an Archaeological Method Statement (AMS) will be prepared for the project which will include appropriate archaeological management in accordance with the AARD.</p> <p>Section 5.3.3 states the AMS would include measures for the Canterbury Bowling Club compound site.</p> <p>REMM NAH12 is referenced in Section 5.3.3.</p> <p>DPE Comment 26.1: Please advise of the status of the AMS referenced above including timing for its completion.</p>	<p>Addressed The AMS for the Project is currently under the development. Section 5.3.3 has been revised to advise the timing of the AMS to be prepared for the Project:</p> <p><i>“An AMS will be prepared for the Project prior to sub-surface impacts within Red (Zone 1) and Amber (Zone 2) archaeological management zones as mapped in Figure 5, Figure 7 and Figure 9.”</i></p>	Y	Section 5.3.3 Page 40		
27	NAH15	Methodologies for the removal of existing structures and construction of new structures would be developed and implemented during construction to minimise direct and indirect impacts to other elements within the curtilages of the heritage items, or to heritage items located in the vicinity of works.	5.2.8	<p>Section 5.2.8 notes that the PC is responsible for ensuring that this requirement is met. The methodology will be prepared by the nominated Heritage Consultant.</p> <p>DPE notes that the Heritage Consultant is yet to be appointed and requests that in any future revisions of the management plan that their details are included.</p> <p>CLOSED</p>	N/A	N/A	N/A	N/A	N/A
28	NAH16	All retained heritage buildings, structures, fabric and moveable heritage items would be protected to avoid damage during works in the vicinity of these items, including from vibration. Retained significant buildings or elements susceptible to damage would be protected by hoardings or screens.	Section 5.2.11 Table 13	<p>Section 5.2.11 addresses protection measures including exclusion zones for the protection of heritage fabric, and includes reference to NAH16. This includes hoarding or screening.</p> <p>Areas where exclusion zones would be required are listed and include all three station locations. Additional areas are also identified, including the Stone house (and interiors), Sewage Pumping Station and other items.</p> <p>CLOSED</p>	N/A	N/A	N/A	N/A	N/A
29	NAH17	Prior to construction commencing, a detailed inventory of all buildings, structures, fabric, spaces and vistas of heritage significance that are to be retained or removed would be prepared by appropriately qualified and experienced heritage specialists. The inventory must provide an assessment of the heritage impact based on the significance of each element and sub- element that comprises it and include recommendations for protection and conservation relative to the identified level of heritage significance.	Section 5.2.7	<p>The CHMP states that this requirement was met during the design phase and is not relevant to the scope of the MCL works.</p> <p>CLOSED</p>	N/A	N/A	N/A	N/A	N/A
	NAH18	In the event that unexpected archaeological remains, relics, or potential heritage items are discovered during construction, all works in the immediate area would cease, and the unexpected finds procedure would be implemented.	Section 5.1.3 Section 5.3.5	As stated earlier, the Sydney Metro Unexpected Finds Procedure will be implemented for the entire Sydney Metro project including the MCL works.	N/A	N/A	N/A	N/A	N/A

Com ment No.	CoA	Requirement	Document reference	DPE comment	Project team response	Amend ment made Y/N?	Page/section	DPE Comment	Final Status
				(Section 5.3 is Non-Aboriginal Archaeological Management and 5.1 is Aboriginal Management.) CLOSED					
	NAH19	In the event that a potential burial site or potential human skeletal material is exposed during construction, the Transport for NSW Exhumation Management Plan would be implemented.	Section 5.1.2 Section 5.3.5	As stated earlier, the Sydney Metro Exhumation Management Plan has been completed by Sydney Metro and sits outside the management of this CHMP. The Sydney Metro Exhumation Plan will be implemented where required. CLOSED	N/A	N/A	N/A	N/A	N/A
30	NAH20	All works to conserve, protect or remove significant heritage fabric would be undertaken by skilled tradespeople with experience working on heritage sites, in consultation with an appropriately qualified conservation heritage architect.	Section 5.2.10	The requirement for the engagement of skilled tradespeople has been addressed in Section 5.2.10. This section notes that the tradespeople will consult with the heritage architect. REMM NAH4 is referenced. CLOSED	N/A	N/A	N/A	N/A	N/A
31	AH1	Aboriginal stakeholder consultation would continue to be undertaken in accordance with Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECC, 2010).	Section 5.5	Consultation with RAPs was undertaken during concept design as part of the Sydney Metro Sydenham to Bankstown EIS and also during preparation of the ACHAR. RAPs will be involved if Aboriginal objects were identified during excavations. CLOSED	N/A	N/A	N/A	N/A	N/A
32	AH2	The Aboriginal Cultural Heritage Assessment Report would be implemented.	Section 5.1.1	The ACHAR prepared by Artefact Heritage in 2017 as part of the PIR is addressed in Section 5.1.1, and references to REMM AH2 are included. There are no identified areas of Aboriginal archaeological potential or Aboriginal sites within the Project area. As such, the ACHAR would be implemented in the event of an unexpected find. CLOSED	N/A	N/A	N/A	N/A	N/A
33	AH3	Archaeological test excavation (and salvage if required) would be carried out at S2B PAD02 at Punchbowl Station. Excavations would be conducted in accordance with the methodology outlined by the Aboriginal cultural heritage assessment report.	N/A	N/A to this scope of work as the site relates to Punchbowl Station. CLOSED	N/A	N/A	N/A	N/A	N/A
35	AH5	If potential Aboriginal items are uncovered during the works, all works in the immediate area would cease, and the unexpected finds procedure included in the construction heritage management plan would be implemented. During pre-work briefings, employees would be made aware of the unexpected finds procedures and obligations under the National Parks and Wildlife Act 1974.	Section 5.1.3	The Sydney Metro Unexpected Finds Procedure would be implemented for the project. The CHMP states that induction and awareness training sessions will address this requirement. CLOSED	N/A	N/A	N/A	N/A	N/A
36	CEMF 10.1(a)	The following heritage management objectives will apply to construction:	Section 1.3 Section 5	Heritage objectives and targets are addressed in Section 1.3. These include:	N/A	N/A	N/A	N/A	N/A

Com ment No.	CoA	Requirement	Document reference	DPE comment	Project team response	Amend ment made Y/N?	Page/section	DPE Comment	Final Status
		<ul style="list-style-type: none"> Embed significant heritage values through any architectural design, education or physical interpretation. Minimise impacts on items or places of heritage value. Avoid accidental impacts on heritage items. Maximise worker's awareness of indigenous and non-indigenous heritage 		<ul style="list-style-type: none"> Minimise impacts on items or places of heritage value Avoid accidental impacts on heritage items Maximise worker's awareness of Aboriginal and non-Aboriginal heritage No disturbance or damage to known heritage sites or items, beyond that approved by the SSI Approval Unknown or undocumented heritage items are not knowingly destroyed, defaced or damaged. <p>Specific management measures that will be implemented to achieve these goals are outlined in Section 5.</p> <p>CLOSED</p>					
37	CEMF 10.2(a)	<p>Principal Contractors will develop and implement a Heritage Management Plan which will include as a minimum:</p> <ul style="list-style-type: none"> (i) Evidence of consultation with Registered Aboriginal Parties and the NSW Heritage Council (ii) Identify initiatives that will be implemented for the enhancement of heritage values and minimisation of heritage impacts, including procedures and processes that will be used to implement and document heritage management initiatives (iii) The heritage mitigation measures as detailed in the environmental approval documentation (iv) The responsibilities of key personnel with respect to the implementation of the plan (v) Procedures for interpretation of heritage values uncovered through salvage or excavation during detailed design (vi) Procedures for undertaking salvage or excavation of heritage relics or sites (where relevant), consistent with and any recordings of heritage relics prior to works commencing that would affect them (vii) Details for the short term and/or long term management of artefacts or movable heritage (viii) Details of management measures to be implemented to prevent and minimise 	<p>Section 1.4</p> <p>Table 13</p> <p>Section 5 Table 13</p> <p>Section 2.3, Table 5</p> <p>Section 2, Section 5.3.2</p> <p>Section 5.3.2</p> <p>Section 5.3.8</p>	<p>Table 4 in Section 2.2 addresses each of these requirements. References to where these issues are addressed are included in the adjacent column.</p> <p>CLOSED</p>	N/A	N/A	N/A	N/A	N/A

Com ment No.	CoA	Requirement	Document reference	DPE comment	Project team response	Amend ment made Y/N?	Page/section	DPE Comment	Final Status
		<p>impacts on heritage items (including further heritage investigations, archival recordings and/or measures to protect unaffected sites during construction works in the vicinity)</p> <p>(ix) Procedures for unexpected heritage finds, including procedures for dealing with human remains</p> <p>(x) Heritage monitoring requirements</p> <p>Compliance record generation and management</p>	<p>Section 5, Table 13</p> <p>Section 5.1.3, Section 5.3.5, Appendix D</p> <p>Section 7</p>						
38	CEMF 10.2(b)	The Contractor's regular inspection will include checking of heritage mitigation measures.	Section 7	<p>The HMP commits to the PC conducting regular inspections which include an assessment of HMP implementation Monitoring and reporting requirements are addressed in Section 7 and include monitoring the implementation of this HMP through regular (daily and weekly) checks.</p> <p>CLOSED</p>	N/A	N/A	N/A	N/A	N/A
39	CEMF 10.2 (c)	<p>Compliance records will be retained by the Contractor. These will include:</p> <p>(i) Inspections undertaken in relation to heritage management measures</p> <p>(ii) Archival recordings undertaken of any heritage item</p> <p>(iii) Unexpected finds and stop work orders</p> <p>(iv) Records of any impacts avoided or minimised through design or construction methods</p>	<p>Section 7</p> <p>Section 5.2.3</p> <p>Section 5.1.3, 5.3.5, Appendix D</p> <p>Section 7, Section 8, Table 13</p>	<p>Table 4 in Section 2.2 addresses each of these requirements. References to where these issues are addressed are included in the adjacent column.</p> <p>CLOSED</p>	N/A	N/A	N/A	N/A	N/A
40	CEMF 10.3(a)	<p>Examples of heritage mitigation measures include:</p> <p>(i) Any heritage item not affected by the works will be retained and protected throughout construction.</p> <p>(ii) During construction undertake professional archaeological investigation, excavation, and reporting of any historical Indigenous heritage sites of state significance which will be affected. Reporting may be completed as construction progresses.</p> <p>(iii) Undertake archival recordings of all non-Indigenous heritage items affected by the works prior to commencement of works</p>	<p>Section 5.2.11</p> <p>Section 5.1</p> <p>Section 5.2.3</p>	<p>Table 4 in Section 2.2 addresses each of these requirements. References to where these issues are addressed are included in the adjacent column.</p> <p>CLOSED</p>	N/A	N/A	N/A	N/A	N/A

Com ment No.	CoA	Requirement	Document reference	DPE comment	Project team response	Amend ment made Y/N?	Page/section	DPE Comment	Final Status
		(iv) Implement unexpected heritage find procedures for Indigenous and non-Indigenous heritage items.	Section 5.1.3, 5.3.5, Appendix D						
41	Table 17.4	<ul style="list-style-type: none"> The design is sympathetic to the historic significance of existing stations, and where practicable, avoids and minimises impacts to heritage. The preferred project retains, and where possible, repurposes all heritage elements. The design and mitigation strategies are reviewed by the Sydney Metro Design Review Panel. Impacts on heritage are managed in accordance with relevant legislation, including the EP&A Act, the Heritage Act 1977, and relevant guidelines. Potential impacts are managed by the mitigation measures. 	Section 5.2.1, Table 3, Table 13	Not applicable to the scope of this management plan. This requirement was fulfilled during the design phases of the Sydenham to Bankstown project. Design requirements are addressed in Section 5.2.1 Legislation and Planning instruments are identified in Table 3 Management CLOSED	N/A	N/A	N/A	N/A	N/A
42		General	CHMP	There are statements throughout the CHMP referring to consultation yet to be undertaken that has now been completed. Eg Table 4 states that "this Plan will be provided to Heritage NSW, City of Canterbury Bankstown and Inner West Council for consultation". DPE Comment: Please update the CHMP to correctly note that consultation has now been completed.	Addressed Section 1.4 and Table have been revised to reflect the current status of this Plan, and the consultation carried out to date ie revised to past tense.	Y	Section 1.4 Table 4		

Agency	Comment	Project Response
CoCB	<p>Email received 24/12/20: <i>“Please find below comments from Council’s Heritage Advisor, [redacted] on the Marrickville, Canterbury and Lakemba HMP.</i></p> <p><i>Comments from Council’s Heritage Advisor, [redacted]:</i> <i>Table 13 of the Canterbury/Lakemba HMP nominates the heritage consultant to be responsible for a range of tasks (Description of Management) that all relates to built heritage fabric. This however is to be the responsibility of a heritage architect. Please ask to have this amended accordingly.</i></p> <p><i>There were no other comments from anyone else from Council on this HMP.”</i></p>	<p>Table 5, Section 5.2 and Table 13 have been revised to better reflect the responsibilities of the heritage specialists engaged by HSE JV, including the Heritage Architect/Conservation Architect. The interface between the role of the Heritage Architect/Conservation Architect and the Heritage Consultant has been articulated in revisions to Section 5.2.13.</p>
IWC	<p>Email received 16/11/20: <i>“I have reviewed the Heritage Management Plan for the Southwest Metro – Marrickville.</i></p> <p><i>I have two issues to comment on:</i></p> <ul style="list-style-type: none"> • <i>NAH 20 (p. 60) calls for the involvement of an experienced heritage architect in works affecting significant heritage fabric, but 5.2.13 (p. 37), and the following text (eg. p. 47 – repair of significant fabric) allocates this responsibility to the heritage consultant. Decisions about significant built fabric should be by the heritage architect rather than the heritage consultant who may not have this skill set.</i> • <i>Council would be interested in receiving a copy of the excavation directors report (in accordance with CoA E12, p. 56) relating to any archaeological finds that are uncovered during the works.”</i> 	<p>Section 5.2.13 has been revised to address this. Reference is now made to the heritage architect.</p> <p>In accordance with CoA B14, this document will be made publicly available on Sydney Metro’s website, where IWC can access the document.</p>
Heritage NSW	<p>Email received 24/11/20: <i>“Thank you for your email dated 29 September 2020 inviting comments from the Heritage Council of NSW on the Construction Heritage Management Plan for the above State Significant Infrastructure (SSI) proposal.</i></p> <p><i>The following State Heritage Register (SHR) listed places are located within and near the proposed project area:</i></p> <ul style="list-style-type: none"> • <i>Marrickville Railway Station – SHR 01186</i> • <i>Sewage Pumping Station – SHR 01342</i> 	

Agency	Comment	Project Response
	<ul style="list-style-type: none"> • Old Sugar Mill – SHR 010290 • Canterbury Railway Station Group – SHR 01190 <p>Items listed on S170 registers located within and near the project are include:</p> <p>1. Railcorp:</p> <ul style="list-style-type: none"> • Marrickville Railway Station – Item No. 4801091 • Canterbury Railway Station Group – Item No. 4801100 • Canterbury (cooks river) Underbridge – Item No. 4801568 • Canterbury (Cooks River/Charles St) Underbridge: Main Line – Item No 5062566 • Lakemba Railway Station – Item No. 4801916 <p>2. Sydney Water:</p> <ul style="list-style-type: none"> • Sewage Pumping Station – Item No. 4571727 <p>There are also several locally listed heritage places within and adjacent to the site listed on Marrickville LEP 2012 and Canterbury LEP 2012.</p> <p>The Construction Heritage Management Plan to guide the works required for South west Sydney Metro is noted. The submitted CHMP is considered satisfactory to guide the works required for Southwest Metro Marrickville, Canterbury and Lakemba Stations Upgrade.</p> <p><i>Historical Archaeology</i></p> <p>The CHMP notes that historical archaeology was assessed through an AARD which divided the project area into different management zones and that where required to guide archaeological works specific AMS documents were also prepared. The AMS documents describe where archaeological work such as monitoring, or salvage should be conducted and also where use of an Unexpected Finds protocol would be appropriate.</p> <p>The CHMP refers to qualified archaeologists who meet the Heritage Council's Criteria for Assessment of Excavation Directors, and this reference should be updated to 2019, not 2011. The CHMP also includes precautionary measures for Human Remains (not anticipated here) and also notes that analysis, storage and reporting would be required for archaeological activities and ensuing finds.</p> <p>Overall the CHMP is considered adequate to guide the future works and mitigate the historic archaeological heritage impacts of the project.</p> <p>As the site contains local heritage items, and other local items are in the vicinity, advice should be sought from the relevant local councils. It is recommended that RailCorp and Sydney Water are also consulted on their s170 register items.</p>	<p>Table 5, Section 5.3.3 and Table 13 of this Sub-plan has been revised to reference the September 2019 revision of <i>Heritage Council's Criteria for Assessment of Excavation Directors</i></p> <p>Consultation with Sydney Trains (RailCorp) on the Project's design and the proposed changes to S.170 listed station groups has occurred throughout the design development process.</p>

Agency	Comment	Project Response
	<p><i>If you have any questions regarding the above advice, please contact [redacted] at Heritage NSW on [redacted].</i></p> <p><i>Yours sincerely,</i></p>	<p>No impacts to Sydney Water S.170 Sewage Pumping Station 271 is anticipated in the delivery of this Project, as such consultation with Sydney Water is not deemed necessary for the development of this Sub-plan.</p>
Heritage NSW	<p>Email received 25/11/20:</p> <p><i>“Thank you for your email dated 4 November 2020 inviting comments from Heritage NSW on the draft Heritage Management Plan for the above State Significant Infrastructure (SSI) proposal.</i></p> <p>Aboriginal cultural heritage regulation is now part of Heritage NSW</p> <p><i>Please note: on 1 July 2020 the Aboriginal cultural heritage regulation functions under the National Parks and Wildlife Act 1974 were transferred to Heritage NSW in the Department of Premier and Cabinet. Any references to the Office of Environment and Heritage (OEH) or the Department of Planning and Environment (DPE) administering Aboriginal objects and Aboriginal places needs to be updated to Heritage NSW where necessary.</i></p> <p>Previous advice on the Aboriginal Cultural Heritage Assessment Report (ACHAR)</p> <p><i>We note the then OEH provided advice on 12 July 2018 requiring the project to be undertaken in accordance with the ACHAR prepared by Artefact Heritage.</i></p> <p>Review of the draft Heritage Management Plan</p> <p><i>Heritage NSW has reviewed the draft HMP in relation to Aboriginal cultural heritage matters and provides the following comments, noting:</i></p> <ul style="list-style-type: none"> <i>• the HMP incorporates mitigation measures outlined in the ACHAR and includes an unexpected finds procedure.</i> <i>• the HMP states that consultation with the Registered Aboriginal Parties (RAPs) is not required under the Conditions of Approval (CoA) or Revised Environmental Management Measures (REMM) for this HMP. The HMP also states this is based on there being no impacts to Aboriginal sites or areas of archaeological potential.</i> <i>• section 5.1.4 outlines that once an unexpected find is assessed, written clearance will be provided by the Project Archaeologist and Sydney Metro and construction would then continue.</i> <p><i>Overall, the draft HMP appears adequate to guide the future works and impacts of the project. We support the HMP being reviewed on a six-monthly basis, or earlier, as outlined under section 8.</i></p> <p>We recommend the following edits be considered in the document:</p>	

Agency	Comment	Project Response
	<ul style="list-style-type: none"> the HMP alternates in sections between references to both Aboriginal and indigenous heritage as well as non-Aboriginal and non-indigenous heritage. We recommend the HMP use consistent terminology to avoid confusion. the timeframe under section 5.1.5 (two years) differs to that in Table 13, page 44 (12 months) in relation to post excavation reporting. The timeframe should be clarified - we would recommend the lesser of the two timeframes so that the results of the Aboriginal cultural heritage assessment work are available sooner. all references to the Office of Environment and Heritage and OEH need to be updated to Heritage NSW unless the reference is in relation to authorship of a document. <p>Comments on the Sydney Metro Unexpected Heritage Finds Procedure We recommend the following edits be considered in the document:</p> <ul style="list-style-type: none"> any references to the Office of Environment and Heritage and OEH need to be updated to Heritage NSW unless the reference is in relation to authorship of a document. the word Aboriginal should be capitalised in Table 2, step 3.4. the term Aboriginal object should be used instead of Aboriginal item in Table 2, step 3.4 for consistency.” <p>If you have any questions regarding these comments, please contact me on [redacted]. Yours sincerely</p>	<p>Unless directly citing the wording in the CEMF, this Sub-plan has been revised to ensure consistency.</p> <p>Comment addressed. Revised to two years as this is consistent with the timing outlined within the Conditions of Approval.</p> <p>All references to OEH have been revised within this Sub-plan unless they are direct quotations from other documents (such as the Conditions of Approval).</p> <p>Comments relate to the Sydney Metro Unexpected Heritage Finds Procedure prepared by Sydney Metro. These comments will be considered by Sydney Metro in the next revision of this document.</p>

Appendix D – Sydney Metro Unexpected Heritage Finds Procedure



Sydney Metro Unexpected Heritage Finds Procedure

[SM-18-00105232]

Sydney Metro Integrated Management System (IMS)

Applicable to:	Sydney Metro
Document Owner:	Author/Document owner
System Owner:	IMS element owner (generally a member of the Executive)
Status:	Draft/Final
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1. Purpose

This procedure is applicable to the Sydney Metro program of works including major projects delivered under Critical State Significant Infrastructure Planning Approvals (CSSI), early CSSI minor and enabling works and works that are subject to the NSW Heritage Act (1977) including s57/139 and s60/140 exemptions and permit approvals.

This procedure has been prepared for Sydney Metro programs to provide a method for managing unexpected heritage items (both Aboriginal and non-Aboriginal) that are discovered during preconstruction (pre-Construction Heritage Manage Plan approval), construction phases (post Construction Heritage Manage Plan approval) and for works subject to the NSW Heritage Act (1977).

An ‘unexpected heritage find’ can be defined as any unanticipated archaeological discovery, that has not been previously assessed or is not covered by an existing approval under the Heritage Act 1977 (Heritage Act) or National Parks and Wildlife Act 1974 (NPW Act).

In NSW, there are strict laws to protect and manage heritage objects and relics. As a result, appropriate heritage management measures need to be implemented to minimise impacts on heritage values; ensure compliance with relevant heritage notification and other obligations; and to minimise the risk of penalties to individuals, Sydney Metro and its contractors. This procedure includes Sydney Metro’s heritage notification obligations under the Heritage Act, NPW Act and the Coroner’s Act 2009 and the requirements of the conditions of approval (CoA) issued by NSW Department of Planning and Environment.

Note that a Contractor must not amend the Sydney Metro Unexpected Finds Procedure without the prior approval of Sydney Metro.

It should be noted that this procedure must be read in conjunction with the relevant CCSI conditionals of approval (if applicable), the contract documents and other plans including the Sydney Metro Exhumation Management Plan and procedures developed by the contractor during the delivery of the Sydney Metro works.

1.1. Legislation that does not apply

The following authorisations are not required for Sydney Metro approved Critical State Significant Infrastructure (and accordingly the provisions of any Act that prohibits an activity without such an authority do not apply):

- Division 8 of Part 6 of the Heritage Act 1977 does not apply to prevent or interfere with the carrying out of approved State significant infrastructure.
- An approval under Part 4, or an excavation permit under section 139, of the Heritage Act 1977,
- An Aboriginal heritage impact permit under section 90 of the National Parks and Wildlife Act 1974,

This document provides relevant background information in Section 4, followed by the technical procedure in Sections 6 and 7. Associated guidance referred to in the procedure can be found in Appendices 1-6.

2. Scope

Despite earlier investigation, unexpected heritage items may still be discovered during works on a Sydney Metro site. When this happens, this procedure must be followed. This procedure provides direction on when to stop work, where to seek technical advice and how to notify the regulator, if required.

This procedure **applies to**:

- the discovery of any unexpected heritage item, relic or object, where the find is not anticipated in an approved Archaeological Assessment Design Report (AARD) or Archaeological Method Statements (AMS) that are prepared as part of the planning approval for that project.

This procedure must be followed by all Sydney Metro staff, contractors, subcontractors or any person undertaking works for Sydney Metro. It includes references to some of the relevant legislative and regulatory requirements, but is not intended to replace them.

This procedure **does not apply** to:

- The discovery and disturbance of heritage items as a result of investigations being undertaken in accordance with the Office of Environment and Heritage's (OEH) *Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW 2010*¹; an Aboriginal Heritage Impact Permit (AHIP) issued under the NPW Act; or a permit approval issued under the Heritage Act.
- the discovery and disturbance of heritage items as a result of construction related activities, where the disturbance is permissible in accordance with an AHIP; or an approval issued under the Heritage Act or CSSI /CSSD planning approval;

3. Definitions

All terminology in this procedure is taken to mean the generally accepted or dictionary definition with the exception of the following terms which have a specifically defined meaning:

	Definitions
AHIP	Aboriginal Heritage Impact Permit
Aboriginal object	An Aboriginal object is any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains. An Aboriginal object may include a shell midden, stone tools, bones, rock art, Aboriginal-built fences and stockyards, scarred trees and the remains of fringe camps.
CEMP	Construction Environmental Management Plan
CoA	Conditions of Approval
CSSD	Critical State Significant Development
CSSI	Critical State Significant Infrastructure
EP&A Act	NSW Environmental Planning and Assessment Act 1979
Excavation	A person that complies with the Heritage Council of NSW's Criteria for Assessment of

¹ An act carried out in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* as published by the Department in the Gazette on 24 September 2010 is excluded from the definition of **harm** an object or place in section 5 (1) of the NPW Act.

Director	Excavation Directors (July 2011) to oversee and advise on matters associated with historic archaeology. Note this applies to a specific project/program and requires consultation and/or approval by OEH.
Heritage Act	NSW <i>Heritage Act 1977</i>
NPW Act	NSW <i>National Parks and Wildlife Act 1974</i>
OEH	Office of Environment and Heritage
SM	Sydney Metro
Relic (non-Aboriginal heritage)	<p>A relic means any deposit, artefact, object or material evidence that:</p> <ul style="list-style-type: none"> a) relates to the settlement of the area that comprises NSW, not being Aboriginal settlement, and b) is of State or local significance. <p>A relic may include items such as bottles, utensils, remnants of clothing, crockery, personal effects, tools, machinery and domestic or industrial refuse.</p>
TfNSW	Transport for New South Wales
Work (non-Aboriginal heritage)	Archaeological features such as historic utilities or buried infrastructure that provide evidence of prior occupations such as former rail or tram tracks, timber sleepers, kerbing, historic road pavement, fences, culverts, historic pavement, buried retaining walls, cisterns, conduits, sheds or building foundations, but are also subject to assessment by the Excavation Director to determine its classification

4. Types of unexpected heritage items and corresponding statutory protections

The roles of project, field and environmental personnel (including construction contractors) are critical to the early identification and protection of unexpected heritage items.

Appendix 1 illustrates the wide range of heritage discoveries found on Sydney Metro projects and provides a useful photographic guide. Subsequent to confirmation of a heritage discovery it must then be identified and assessed by Excavation Director. An ‘unexpected heritage item’ means any unanticipated discovery of an actual or potential heritage item, for which Sydney Metro does not have approval to disturb² and/or have an existing management process in place.

These discoveries are categorised as either:

- (a) Aboriginal objects
- (b) Historic (non-Aboriginal) heritage items
- (c) Human skeletal remains.

The relevant legislation that applies to each of these categories is described below and is also addressed in the Sydney Metro Exhumation Management Plan).

4.1. Aboriginal objects

The NPW Act protects Aboriginal objects which are defined as:

² Disturbance is considered to be any physical interference with the item that results in it being destroyed, defaced, damaged, harmed, impacted or altered in any way (this includes archaeological investigation activities).

“any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains”³.

Examples of Aboriginal objects include stone tool artefacts, shell middens, axe grinding grooves, pigment or engraved rock art, burials and scarred trees.

IMPORTANT!

All Aboriginal objects, regardless of significance, are protected under law.

If any impact is expected to an Aboriginal object, an AHIP is usually required from OEH. Also, when a person becomes aware of an Aboriginal object they must notify the Director-General of OEH about its location⁴. Assistance on how to do this is provided in Section 7 (Step 5).

4.2. Historic heritage items

Historic (non-Aboriginal) heritage items may include:

- Archaeological ‘relics’
- Other historic items (i.e. works, structures, buildings or movable objects).

4.2.1. Archaeological relics

The Heritage Act protects *relics* which are defined as:

“any deposit, artefact, object or material evidence that relates to the settlement of the area that comprises NSW, not being Aboriginal settlement; and is of State or local heritage significance”⁵.

Relics are archaeological items of local or state significance which may relate to past domestic, industrial or agricultural activities in NSW, and can include bottles, remnants of clothing, pottery, building materials and general refuse.

IMPORTANT!

All relics are subject to statutory controls and protections.

If a relic is likely to be disturbed, a heritage approval is usually required from the NSW Heritage Council⁶. Also, when a person discovers a relic they must notify the NSW Heritage Council of its location⁷.

4.2.2. Other historic items

Some historic heritage items are not considered to be ‘relics’, but are instead referred to as works, buildings, structures or movable objects. Examples of these items that may be encountered include culverts, historic pavements, retaining walls, tramlines, rail tracks, timber sleepers, cisterns, fences, sheds, buildings and conduits. Although an approval under the Heritage Act may not be required to disturb these items, their discovery must be managed in accordance with this procedure.

³ Section 5(1) NPW Act.

⁴ This is required under section 89(A) of the NPW Act and applies to all Sydney Metro projects.

⁵ Section 4(1) Heritage Act.

⁷ This is required under section 146 of the Heritage Act and applies to all Sydney Metro projects.

As a general rule, an archaeological relic requires discovery or examination through the act of excavation. For an unexpected find an archaeological excavation permit under section 140 of the Heritage Act may be required to do this. In contrast, ‘other historic items’ either exist above the ground surface (e.g. a shed), or they are designed to operate and exist beneath the ground surface (e.g. a culvert).

4.3. Human skeletal remains

Also refer to Sydney Metro Exhumation Management Plan for a more detailed explanation of the approval processes.

Human skeletal remains can be identified as either an Aboriginal object or non-Aboriginal relic depending on ancestry of the individual (Aboriginal or non-Aboriginal) and burial context (archaeological or non-archaeological). Remains are considered to be archaeological when the time elapsed since death is suspected of being 100 years or more. Depending on ancestry and context, different legislation applies.

As a simple example, a pre-European settlement archaeological Aboriginal burial would be protected under the NPW Act, while a historic (non-Aboriginal) archaeological burial within a cemetery would be protected under the Heritage Act. For a non-Aboriginal archaeological burial, the relevant heritage approval and notification requirement described in Section 3.1 would apply. In addition to the NPW Act, finding Aboriginal human remains also triggers notification requirements to the Commonwealth Minister for the Environment under section 20(1) of the Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Commonwealth).

IMPORTANT!

All human skeletal remains are subject to statutory controls and protections.

All bones must be treated as potential human skeletal remains and work around them must stop while they are protected and investigated urgently.

However, where it is suspected that less than 100 years has elapsed since death, the human skeletal remains come under the jurisdiction of the State Coroner and the Coroners Act 2009 (NSW). Such a case would be considered a ‘reportable death’ and under legal notification obligations set out in section 35(2); a person must report the death to a police officer, a coroner or an assistant coroner as soon as possible. This applies to all human remains less than 100 years old⁸ regardless of ancestry (i.e. both Aboriginal and non-Aboriginal remains). Public health controls may also apply.

Guidance on what to do when suspected human remains are found is provided in Appendix 5.

5. Legislative Requirements

Table 1 identifies some of the relevant legislation/regulations for the protection of heritage and the management of unexpected heritage finds in NSW. It should be noted that significant

⁸ Under section 19 of the *Coroners Act 2009*, the coroner has no jurisdiction to conduct an inquest into reportable death unless it appears to the coroner that (or that there is reasonable cause to suspect that) the death or suspected death occurred within the last 100 years.

penalties exist for breaches of the listed legislation as a result of actions that relate to unauthorised impacts on heritage items. Further, it is noted that heritage that has been assessed and is being managed in accordance with relevant statutory approvals(s) is exempt from these offences.

To avoid breaches of legislation, it is important that Sydney Metro and its contractors are aware of their statutory obligations under relevant legislation and that appropriate control measures are in place to ensure that unexpected heritage items are appropriately managed during construction. Contractors/Alliances will need to ensure that they undertake their own due diligence to identify any other legislative requirements that may apply for a given project.

Table 1 Legislation and guidelines for management of unexpected heritage finds

Relevant Requirement	Objectives and offences
<i>Environmental Planning and Assessment Act 1979 (EP&A Act)</i>	Section 115ZB Giving of approval by Minister to carry out a project.
<i>Environmental Planning and Assessment Act 1979 (EP&A Act)</i>	Requires heritage to be considered within the environmental impact assessment of projects. This guideline is based on the premise that an appropriate level of Aboriginal and non-Aboriginal cultural heritage assessment and investigations and mitigation have already been undertaken under the relevant legislation, including the EP&A Act, during the assessment and determination process. It also assumes that appropriate mitigation measures have been included in the conditions of any approval.
<i>Heritage Act 1977 (Heritage Act)</i>	The Heritage Act provides for the care, protection and management of heritage items in NSW. Under section 139, it is an offence to disturb or excavate any land knowing or having reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed, unless the disturbance or excavation is carried out in accordance with an excavation permit issued by the Heritage Division of the OEH. Under the Act, a relic is defined as: <i>‘any deposit, artefact, object or material evidence that: (a) relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement, and (b) is of State or local heritage significance.’</i> A person must notify the Heritage Division of OEH, if a person is aware or believes that they have discovered or located a relic (section 146). Penalties for offences under the Heritage Act can include six months imprisonment and/or a fine of up to \$1.1million.

Relevant Requirement	Objectives and offences
<p>National Parks and Wildlife Act 1974 (NPW Act)</p>	<p>The NPW Act provides the basis for the care, protection and management of Aboriginal objects and places in NSW.</p> <p>An Aboriginal object is defined as: <i>‘any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains’.</i></p> <p>An ‘Aboriginal place’ is an area declared by the Minister administering the Act to be of special significance with respect to Aboriginal culture. An Aboriginal place does not have to contain physical evidence of occupation (such as Aboriginal objects).</p> <p>Under section 87 of the Act, it is an offence to harm or desecrate an Aboriginal object or place. There are strict liability offences. An offence cannot be upheld where the harm or desecration was authorised by an AHIP and the permit’s conditions were not contravened. Defences and exemptions to the offence of harming an Aboriginal object or Aboriginal place are provided in section 87, 87A and 87B of the Act.</p> <p>A person must notify OEH if a person is aware of the location of an Aboriginal object.</p> <p>Penalties for some of the offences can include two years imprisonment and/or up to \$550,000 (for individuals), and a maximum penalty of \$1.1 million (for corporations).</p>

6. Unexpected heritage finds protocol

6.1. What is an unexpected heritage find?

An ‘unexpected heritage find’ can be defined as any unanticipated archaeological discovery that has not been identified during a previous assessment or is not covered by an existing permit under the Heritage Act. The find may have potential cultural heritage value, which may require some type of statutory cultural heritage permit or notification if any interference of the heritage item is proposed or anticipated.

The range of potential archaeological discoveries can include but are not limited to:

- remains of rail infrastructure including buildings, footings, stations, signal boxes, rail lines, bridges and culverts
- remains of other infrastructure including sandstone or brick buildings, wells, cisterns, drainage services, conduits, old kerbing and pavement, former road surfaces, timber and stone culverts, bridge footings and retaining walls
- artefact scatters including clustering of broken and complete bottles, glass, ceramics, animal bones and clay pipes
- Archaeological human skeletal remains.

6.2. Managing unexpected heritage finds

In the event that an unexpected heritage find (the find) is encountered on a Sydney Metro site, the flowchart in Figure 1 must be followed. There are eight steps in the procedure. These steps are summarised in Figure 1 and explained in detail in Table 2.

Figure 1 Overview of steps to be undertaken on the discovery of an unexpected heritage item

IMPORTANT!

Sydney Metro may have approval to impact on certain heritage items during construction. If you think that you may have discovered a heritage item and you are unsure whether an approval is in place or not, **STOP** works and follow this procedure.

Table 2 Specific tasks to be implemented following the discovery of an unexpected heritage item

Step	Task	Responsibility	Guidance and tools
1	Stop work, protect item and inform the Excavation Director		
1.1	Stop all work in the immediate area of the item and notify the Project Manager	Contractor/ Supervisor	Appendix 1 (Identifying Unexpected Heritage items)
1.2	Establish a 'no-go zone' around the item. Use high visibility fencing, where practical. No work is to be undertaken within this zone until further investigations are completed and, if required, appropriate approvals are obtained. Inform all site personnel about the no-go zone.	Project Manager/ Contractor/ Supervisor	
1.3	Inspect, document and photograph the item.	Archaeologist and or Excavation Director	Appendix 2 (Unexpected Heritage Item Recording Form) Appendix 3 (Photographing Unexpected Heritage items)
1.4	Is the item likely to be bone? If yes , follow the steps in Appendix 4 – 'Uncovering bones'. Where it is obvious that the bones are human remains, you must notify the local police by telephone immediately. They may take command of all or part of the site. Also refer to the Sydney Metro Exhumation Management Plan If no , proceed to next step.	Excavation Director	Appendix 4 (Uncovering Bones)

Step	Task	Responsibility	Guidance and tools
1.5	Inform the Excavation Director of the item and provide as much information as possible, including photos and completed form (Appendix 2). Where the project has a Sydney Metro Environmental Manager, the Environmental Manager should be involved in the tasks/process.	Contractors Project Manager	
1.6	Can the works avoid further disturbance to the item? Project Manager to confirm with Sydney Metros Environment Manager. Complete the remaining tasks in Step 1.	Contractors Project Manager	
1.7	Excavation Director and Sydney Metro Environmental Manager to advise the Project Manager whether Sydney Metro has approval to impact on the 'item'. Does Sydney Metro have an approval or permit to impact on the item? If yes , work may recommence in accordance with that approval or permit. There is no further requirement to follow this procedure. If no , continue to next step.	Contractors Project Manager	
1.8	Has the 'find' been damaged or harmed? If yes , record the incident in the Incident Management System Implement any additional reporting requirements related to the planning approval and CEMP, where relevant.	Contractors Project Manager, Excavation Director	
2	Contact and engage an archaeologist and/or an Aboriginal heritage consultant		
2.1	If an archaeologist and/or Aboriginal heritage consultant has been previously appointed for the project, contact them to discuss the location and extent of the item and arrange a site inspection, if required. The project CEMP may contain contact details of the archaeologist/Aboriginal heritage consultant. Where there is no project archaeologist engaged for the works engage a suitably qualified consultant to assess the find: if the find is a non-Aboriginal deposit, engage a suitably qualified and experienced archaeological consultant if the find is likely to be an Aboriginal object, engage an Aboriginal heritage consultant to assess the find.	Contractors Project Manager, Excavation Director	
2.2	If requested, provide photographs of the item taken during Step 1.3 to the archaeologist or Aboriginal heritage consultant.	Contractors Project Manager, Excavation Director	Appendix 3 (Photographing Unexpected Heritage items)

Step	Task	Responsibility	Guidance and tools
3	Preliminary assessment and recording of the find		
3.1	In a minority of cases, the archaeologist/Aboriginal heritage consultant may determine from the photographs that no site inspection is required because no heritage constraint exists for the project (e.g. the item is not a 'relic', a 'heritage item' or an 'Aboriginal object'). Any such advice should be provided in writing (e.g. via email or letter with the consultant's name and company details clearly identifiable) to the Sydney Metro Project Manager.	Archaeologist/ Aboriginal heritage consultant/ Excavation Director	Proceed to Step 8
3.2	Arrange site access for the archaeologist/Aboriginal heritage consultant to inspect the item as soon as practicable. In the majority of cases a site inspection is required to conduct a preliminary assessment.	Contractors Project Manager, Excavation Director	
3.3	Subject to the archaeologist/Aboriginal heritage consultant's assessment, work may recommence at a set distance from the item. This is to protect any other archaeological material that may exist in the vicinity, which may have not yet been uncovered. Existing protective fencing established in Step 1.2 may need to be adjusted to reflect the extent of the newly assessed protective area. No works are to take place within this area once established.	Archaeologist/ Aboriginal heritage consultant Contractors Project Manager, Excavation Director	
3.4	The archaeologist/Aboriginal heritage consultant may provide advice after the site inspection and preliminary assessment that no heritage constraint exists for the project (e.g. the item is not a 'relic' or a 'heritage item' or an 'aboriginal item'. Any such advice should be provided in writing (e.g. via email or letter with the consultant's name and company details clearly identifiable) to the Metro Project Manager. Note that : a relic is evidence of past human activity which has local or State heritage significance. It may include items such as bottles, utensils, remnants of clothing, crockery, personal effects, tools, machinery and domestic or industrial refuse an Aboriginal object may include a shell midden, stone tools, bones, rock art or a scarred tree a "work", building or standing structure may include tram or train tracks, kerbing, historic road pavement, fences, sheds or building foundations.	Archaeologist/ Aboriginal heritage consultant/ Contractors Project Manager, Excavation Director	Proceed to Step 8 Refer to Appendix 1 (Identifying heritage items)

Step	Task	Responsibility	Guidance and tools
3.5	Where required, seek additional specialist technical advice (such as a forensic or physical anthropologist to identify skeletal remains). The archaeologist/Aboriginal heritage consultant can provide contacts for such specialist consultants.	Excavation Director Archaeologist	
3.6	Where the item has been identified as a 'relic' or 'heritage item' or an 'Aboriginal object' the archaeologist should formally record the item.	Archaeologist/ Aboriginal heritage consultant	
3.7	OEH (Heritage Division for non-Aboriginal relics and Planning and Aboriginal Heritage Section for Aboriginal objects) can be notified informally by telephone at this stage by the Sydney Metro Environmental Manager Any verbal conversations with regulators must be noted on the project file for future reference.	Contractors Project Manager, Excavation Director	
4	Section 4 not used		
5	Notify the regulator, if required.		
5.1	Based on the findings of the archaeological or heritage management plan and corresponding legislative requirements, is the find required to be notified to OEH and the Secretary? If no , proceed directly to Step 6 If yes , proceed to next step.	Sydney Metro Environmental Manager Excavation Director	
5.2	If notification is required, complete the template notification letter, including the archaeological/heritage management plan and other relevant supporting information and forward to the Sydney Metro Principal Manager Sustainability Environment and Planning (Program) for signature.	Sydney Metro Environmental Manager Excavation Director	Appendix 6 (Template Notification Letter)
5.3	Forward the signed notification letter to OEH and the Secretary. Informal notification (via a phone call or email) to OEH prior to sending the letter is appropriate. The archaeological or heritage management plan and the completed site recording form (Appendix 2) must be submitted with the notification letter (for both Aboriginal objects and non-Aboriginal relics). For Part 5.1 projects, the Department of Planning and Environment must also be notified.		

Step	Task	Responsibility	Guidance and tools
5.4	A copy of the final signed notification letter, archaeological or heritage management plan and the site recording form is to be kept on file and a copy sent to the Sydney Metro Project Manager.	Contractors Project Manager, Excavation Director	
6	Implement archaeological or heritage management plan		
6.1	Modify the archaeological or heritage management plan to take into account any additional advice resulting from notification and discussions with OEH.	Contractors Project Manager, Excavation Director	
6.2	Implement the archaeological or heritage management plan. Where impact is expected, this may include a formal assessment of significance and heritage impact assessment, preparation of excavation or recording methodologies, consultation with Registered Aboriginal Parties, obtaining heritage approvals etc., if required.	Contractors Project Manager, Excavation Director	
6.3	Where heritage approval is required contact the Sydney Metro Environment Manager for further advice and support material. Please note there are time constraints associated with heritage approval preparation and processing.	Contractors Project Manager, Excavation Director	
6.4	Assess whether heritage impact is consistent with the project approval or if project approval modification is required from the Department of Planning and Environment.	, Excavation Director/Sydney Metro Environmental Manager	
6.5	Where statutory approvals (or project approval modification) are required, impact upon relics and/or Aboriginal objects must not occur until heritage approvals are issued by the appropriate regulator.	Contractors Project Manager, Excavation Director	
6.6	Where statutory approval is not required but where recording is recommended by the archaeologist/Aboriginal heritage consultant, sufficient time must be allowed for this to occur.	Contractors Project Manager, Excavation Director	
6.7	Ensure short term and permanent storage locations are identified for archaeological material or other heritage material removed from site, where required. Interested third parties (e.g. museums, local Aboriginal land councils, or local councils) should be consulted on this issue. Contact the archaeologist or Aboriginal heritage consultant for advice on this matter, if required.	Contractors Project Manager, Excavation Director	
7	Section 7 Not Used		

Step	Task	Responsibility	Guidance and tools
8	Resume work		
8.1	Seek written clearance to resume project work from the project Excavation Director/Archaeologist/Aboriginal heritage consultant. Clearance would only be given once all archaeological excavation and/or heritage recommendations and approvals (where required) are complete. Resumption of project work must be in accordance with the all relevant project/heritage approvals/determinations.	Contractors Project Manager, Excavation Director	
8.2	If required, ensure archaeological excavation/heritage reporting and other heritage approval conditions are completed in the required timeframes. This includes artefact retention repositories, conservation and/or disposal strategies.	Contractors Project Manager, Excavation Director	
8.3	Deleted		
8.4	If additional unexpected items are discovered this procedure must begin again from Step 1.	All	

7. Responsibilities

Table 3 Roles and Responsibilities

Role	Responsibility or role under this guideline
Contractor / Supervisor	Stop work immediately when an unexpected heritage find is encountered. Cordon off area until Environmental Manager /Excavation Director advises that work can recommence.
Contractor or Environment Manager	Manage the process of identifying, protecting and mitigating impacts on the 'find'. Liaise with Sydney Metro Project Manager and Environment Manager and assist the archaeologist/Aboriginal heritage consultant with mitigation and regulatory requirements. Complete Incident Report and review CEMP for any changes required. Propose amendments to the CEMP if any changes are required.
Contractor's or Project Heritage Advisor or Consultant	Provide expert advice to the Sydney Metro Environment Manager on 'find' identification, significance, mitigation, legislative procedures and regulatory requirements.
Environmental Representative	Independent environmental advisor engaged by Sydney Metro Ensures compliance with relevant approvals (new and existing).
Heritage Division of OEH	Regulate the care, protection and management of relics (non-Aboriginal heritage). Delegated authority for Heritage Council Issue excavation permits.

Role	Responsibility or role under this guideline
Registered Aboriginal Parties (RAPs)	Aboriginal people who have registered with Sydney Metro to be consulted about a proposed project or activity in accordance with the OEH <i>Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010</i> .
Sydney Metro Environment Manager	Notify the Sydney Metro Principal Manager, Environmental Management of 'find' and manage Incident Reporting once completed by Environmental Manager.
Contractors Project Manager	Ensures all aspects of this procedure are implemented. Advise Contractor / Supervisor to recommence work if all applicable requirements have been satisfied and the Excavation Director /Project Archaeologist has approved recommend of work.

8. Seeking Advice

Advice on this procedure should be sought from the Sydney Metro Environment a Manager in the first instance. Contractors and alliance partners should ensure their own project environment managers are aware of and understand this procedure. Technical archaeological or heritage advice regarding an unexpected heritage item should be sought from a suitably qualified and experienced archaeologist/Aboriginal heritage consultant.

9. Related documents and references

- Environmental Incident Classification and Reporting – 9TP-PR-105
- Guide to Environmental Control Map – 3TP-SD-015
- NSW Heritage Office (1998), *Skeletal remains: guidelines for the management of human skeletal remains*.
- Roads and Maritime Services (2015), *Standard Management Procedure Unexpected Heritage Items*.
- Department of Environment and Conservation NSW (2006), *Manual for the identification of Aboriginal remains*.
- Sydney Metro Exhumation Management Plan

10. List of appendices

The following appendices are included to support this procedure:

- Appendix 1: Examples of finds encountered during construction works
- Appendix 2: Unexpected Heritage Item Recording Form
- Appendix 3: Photographing Unexpected Heritage Items
- Appendix 4: Uncovering Bones
- Appendix 5: Archaeological Advice Checklist
- Appendix 6: Template Notification Letter

11. Document history

Version	Date of approval	Notes
1.1		Incorporates ER comments 21/06/17
1.2		Amends p13 step 8 reference to s146 added
1.3		Incorporates Planning Mods 1-4 including amended CoA E20
1.4		Incorporates ER comments 21/03/18
2.0		Removes SSI 15-7400 COA reference

Appendix 1: Examples of finds encountered during construction works



Photo 1 - Aboriginal artefacts found at the Wickham Transport Interchange, 2015



Photo 2 – Aboriginal artefacts (shell material) found at the Wickham Transport Interchange, 2015



Photo 3 1840s seawall and 1880s retaining wall uncovered at Balmain East, 2016



Photo 4 Sandstone pavers uncovered at Balmain East, 2016



Photo 5 - Platform structure at Hamilton Railway Station classified as a 'work' by the project archaeologist - Wickham Transport Interchange project, 2015

Photo 6 - Platform structure at Hamilton Railway Station classified as a 'work' by the project archaeologist - Wickham Transport Interchange project, 2015



Photo 7 - Sandstone flagging and cesspit - Wynyard Walk project, 2014



Photo 8 - Chinese Ming Dynasty pottery and English porcelain/pottery dating back to early 19th century - Wynyard Walk project, 2014



Photo 9 - Pottery made by convict potter Thomas Ball during the early settlement - Wynyard Walk project, 2014

The following images, obtained from the Roads and Maritime Services' *Standard Management Procedure for Unexpected Heritage items 2015*, can be used to assist in the preliminary identification of potential unexpected items during construction and maintenance works.



Photo 10 - Top left hand picture continuing clockwise: Stock camp remnants (Hume Highway Bypass at Tarcutta); Linear archaeological feature with post holes (Hume Highway Duplication), Animal bones (Hume Highway Bypass at Woomargama); Cut wooden stake; Glass jars, bottles, spoon and fork recovered from refuse pit associated with a Newcastle Hotel (Pacific Highway, Adamstown Heights, Newcastle area) (RMS, 2015).

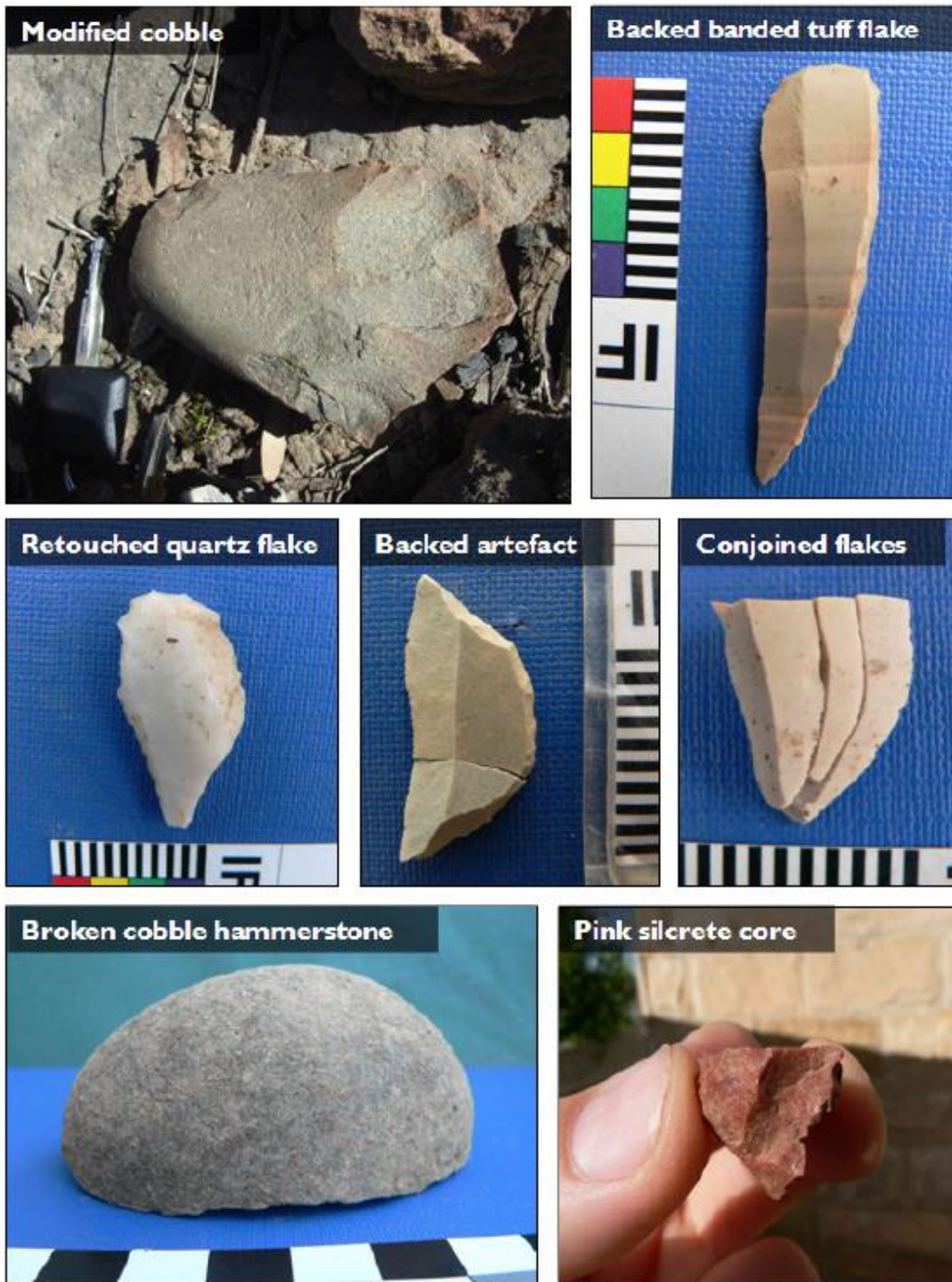


Photo 11 - Top left hand picture continuing clockwise: Stock camp remnants (Hume Highway Bypass at Tarcutta); Linear archaeological feature with post holes (Hume Highway Duplication), Animal bones (Hume Highway Bypass at Woomargama); Cut wooden stake; Glass jars, bottles, spoon and fork recovered from refuse pit associated with a Newcastle Hotel (Pacific Highway, Adamstown Heights, Newcastle area) (RMS, 2015).

Appendix 2 - Unexpected heritage item recording form

Example of unexpected heritage item recording form:

This form is to be completed Excavation Director on the discovery of an archaeological heritage item during construction or maintenance works			
Date:		Recorded by:	
		(include name and position)	
Project name:			
Description of works being undertaken:			
Description of exact location of item			
Description of item found <i>(What type of item is it likely to be? Tick the relevant boxes).</i>			
A. A relic	<input type="checkbox"/>	A 'relic' is evidence of a past human activity relating to the settlement of NSW with local or state heritage significance. A relic might include bottle, utensils, plates, cups, household items, tools, implements, and similar items	
B. A 'work', building or structure'	<input type="checkbox"/>	A 'work' can generally be defined as a form infrastructure such as track or rail tracks, timber sleepers, a culvert, road base, a bridge pier, kerbing, and similar items	
C. An Aboriginal object	<input type="checkbox"/>	An 'Aboriginal object' may include stone tools, stone flakes, shell middens, rock art, scarred trees and human bones	
D. Bone	<input type="checkbox"/>	Bones can either be human or animal remains. Remember that you must contact the local police immediately by telephone if you are certain that the bone(s) are human remains.	
E. Other	<input type="checkbox"/>		
Provide a short description of the item <i>(E.g. metal rail tracks running parallel to the rail corridor. Good condition. Tracks set in concrete, approximately 10 cm below the current ground surface).</i>			

(Uncontrolled when printed)

<p>Sketch <i>(Provide a sketch of the item's general location in relation to other road features so its approximate location can be mapped without having to re-excavate it. In addition, please include details of the location and direction of any photographs of the item taken)</i></p>			
<p>Action taken (Tick either A or B)</p>			
<p>A. Unexpected item would not be further impacted on by the works</p>	<input type="checkbox"/>	<p>Describe how works would avoid impact on the item. (E.g. the rail tracks would be left in situ and recovered with paving).</p>	
<p>B. Unexpected item would be further impacted by the works</p>	<input type="checkbox"/>	<p>Describe how works would impact on the item. (E.g. milling is required to be continued to a depth of 200 mm depth to ensure the pavement requirements are met. Rail tracks would need to be removed.)</p>	
<p>Excavation Director</p>		<p>Signature</p>	
		<p>Signature</p>	

Important

It is a statutory offence to disturb Aboriginal objects and historic relics (including human remains) without an approval. All works affecting objects and relics must cease until an approval is sought.

Approvals may also be required to impact on certain works.

Appendix 3 - Photographing unexpected heritage items

Photographs of unexpected items in their current context (*in situ*) may assist archaeologists/Aboriginal heritage consultants to better identify the heritage values of the item. Emailing good quality photographs to specialists can allow for better quality and faster heritage advice. The key elements that must be captured in photographs of the item include its position, the item itself and any distinguishing features. All photographs must have a scale (ruler, scale bar, mobile phone, coin etc.) and a note describing the direction of the photograph.

Context and detailed photographs

It is important to take a general photograph (Figure 1) to convey the location and setting of the item. This will add value to the subsequent detailed photographs also required (Figure 2).

Removal of the item from its context (e.g. excavating from the ground) for photographic purposes is not permitted.

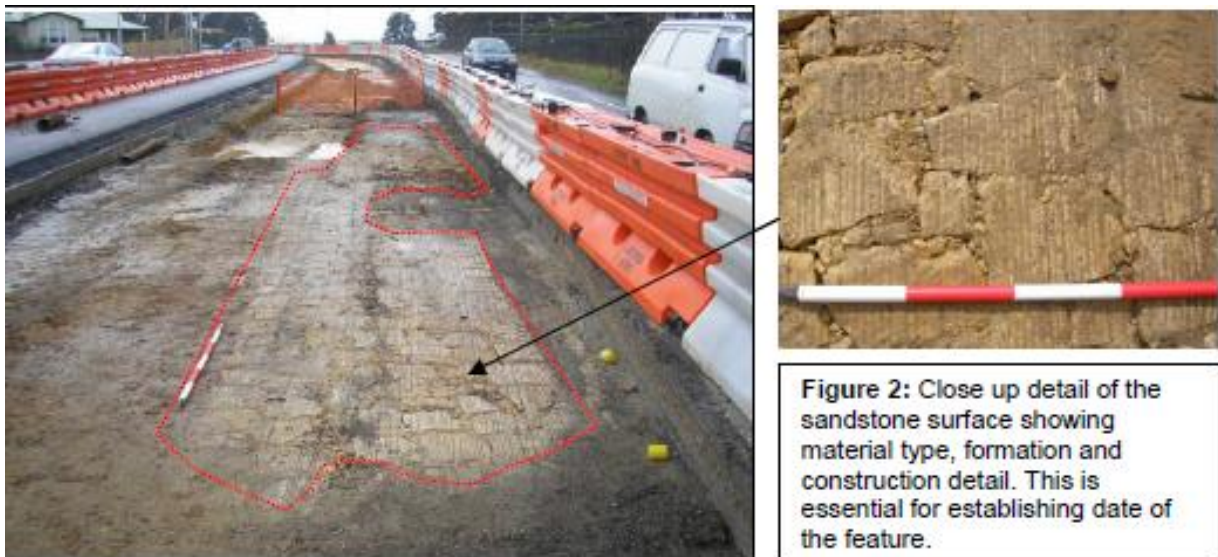


Figure 1: Telford road uncovered on the Great Western Highway (Leura) in 2008 (RMS, 2015).

Photographing distinguishing features

Where unexpected items have a distinguishing feature, close up detailed photographs must be taken of these features, where practicable. In the case of a building or bridge, this may include diagnostic details architectural or technical features. See Figures 3 and 4 for examples.



Figure 3: Ceramic bottle artefact with stamp.



Figure 4: Detail of the stamp allows 'Tooth & Co Limited' to be made out. This is helpful to a specialist in gauging the artefact's origin, manufacturing date and likely significance.

Photographing bones

The majority of bones found on site will those of be recently deceased animal bones often requiring no further assessment (unless they are in archaeological context). However, if bones are human, the police must be contacted immediately (see Appendix 6 for detailed guidance). Taking quality photographs of the bones can often resolve this issue quickly. The project archaeologist can confirm if bones are human or non-human if provided with appropriate photographs.

Ensure that photographs of bones are not concealed by foliage (Figure 5) as this makes it difficult to identify. Minor hand removal of foliage can be undertaken as long as disturbance of the bone does not occur. Excavation of the ground to remove bone(s) should not occur, nor should they be pulled out of the ground if partially exposed.

Where sediment (adhering to a bone found on the ground surface) conceals portions of a bone (Figure 6) ensure the photograph is taken of the bone (if any) that is not concealed by sediment.



Figure 5: Bone concealed by foliage.



Figure 6: Bone covered in sediment

Ensure that all close up photographs include the whole bone and then specific details of the bone (especially the ends of long bones, the *epiphysis*, which is critical for species identification). Figures 7 and 8 are examples of good photographs of bones that can easily

be identified from the photograph alone. They show sufficient detail of the complete bone and the epiphysis.



Figure 7: Photograph showing complete bone.



Figure 8: Close up of a long bone's epiphysis.

Appendix 4 - Uncovering bones

This appendix provides advice regarding:

- what to do on first discovering bones
- the range of human skeletal notification pathways
- additional considerations and requirements when managing the discovery of human remains.

1. First uncovering bones

Refer to the Sydney Metro Exhumation Management Plan

Stop all work in the vicinity of the find. All bones uncovered during project works should be **treated with care and urgency** as they have the potential to be human remains. The bones must be identified as either human or non-human as soon as possible by a qualified forensic or physical anthropologist.

On the very rare occasion where it is immediately obvious from the remains that they are human, the Project Manager (or a delegate) should **inform the police by telephone** prior to seeking specialist advice. It will be obvious that it is human skeletal remains where there is no doubt, as demonstrated by the example in Figure 1⁹. Often skeletal elements in isolation (such as a skull) can also clearly be identified as human. Note it may also be obvious that human remains have been uncovered when soft tissue and/or clothing are present.

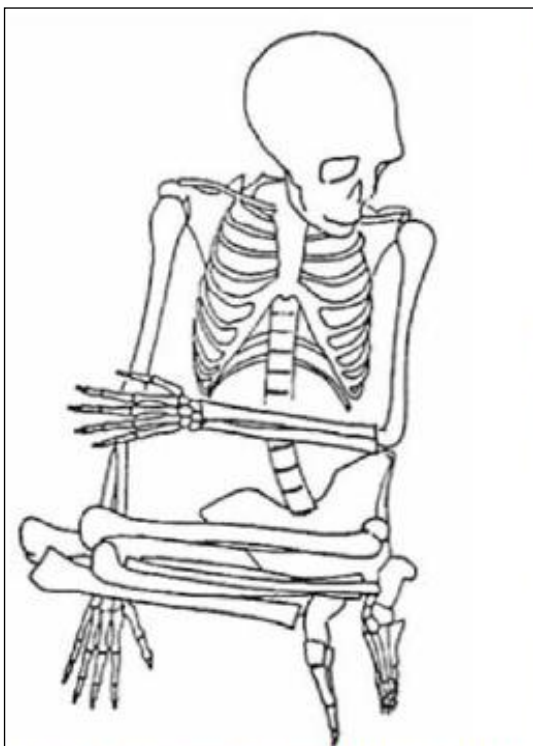


Figure 1: Schematic of a complete skeleton that is 'obviously' human¹².



Figure 2: Disarticulated bones that require assessment to determine species.

⁹ After Department of Environment and Conservation NSW (2006), *Manual for the identification of Aboriginal Remains*: 17

This preliminary phone call is to let the police know that a specialist skeletal assessment to determine the approximate date of death which will inform legal jurisdiction. The police may wish to take control of the site at this stage. If not, a forensic or physical anthropologist must be requested to make an on-site assessment of the skeletal remains.

Where it is not immediately obvious that the bones are human (in the majority of cases, illustrated by Figure 2), specialist assessment is required to establish the species of the bones. Photographs of the bones can assist this assessment if they are clear and taken in accordance with guidance provided in Appendix 3. Good photographs often result in the bones being identified by a specialist without requiring a site visit; noting they are nearly always non-human. In these cases, non-human skeletal remains must be treated like any other unexpected archaeological find.

If the bones are identified as human (either by photographs or an on-site inspection) a technical specialist must determine the likely ancestry (Aboriginal or non-Aboriginal) and burial context (archaeological or forensic). This assessment is required to identify the legal regulator of the human remains so **urgent notification** (as below) can occur.

Preliminary telephone or verbal notification by the archaeologist to the Sydney Metro Principal Manager Sustainability Environment and Planning (Program) is appropriate. This must be followed up later by a formal letter notification to the relevant regulator when a management plan has been developed and agreed to by the relevant parties.

2. Range of human skeletal notification pathways

The following is a summary of the different notification pathways required for human skeletal remains depending on the preliminary skeletal assessment of ancestry and burial context.

A. Human bones are from a recently deceased person (less than 100 years old).

Action

A police officer must be notified immediately as per the obligations to report a death or suspected death under s35 of the *Coroners Act 2009* (NSW). It should be assumed the police will then take command of the site until otherwise directed.

B. Human bones are archaeological in nature (more than 100 years old) and are likely to be **Aboriginal** remains.

Action

The OEH (Planning and Aboriginal Heritage Section) must be notified immediately. The Aboriginal Cultural Heritage Advisor must contact and inform the relevant Aboriginal community stakeholders who may request to be present on site.

C. Human bones are archaeological in nature (more than 100 years old) and likely to be non-Aboriginal remains.

Action

The OEH (Heritage Division) must be notified immediately

Figure 3 summarises the notification pathways on finding bones.

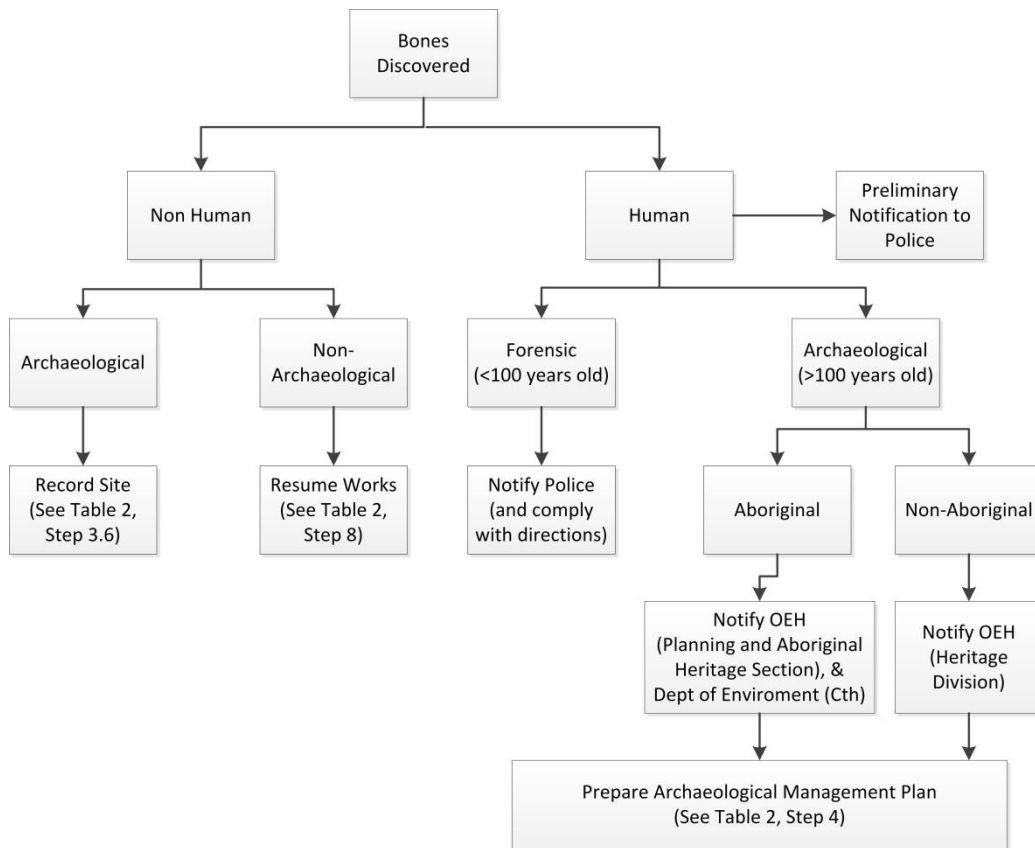


Figure 3 Overview of steps to be undertaken on the discovery of bones

After the appropriate verbal notifications (as described in 2B and 2C above), the Project Manager must proceed through the *Unexpected Heritage Items Exhumation Management Plan* (Step 4). It is noted that no *Exhumation Management Plan* is required for forensic cases (2A), as all future management is a police matter. Non-human skeletal remains must be treated like any other unexpected archaeological find and so must proceed to record the find as per Step 3.6.

3. Additional considerations and requirements

Uncovering archaeological human remains must be managed intensively and needs to consider a number of additional specific issues. These issues might include facilitating culturally appropriate processes when dealing with Aboriginal remains (such as repatriation and cultural ceremonies). Project Managers may need to consider overnight site security of any exposed remains and may need to manage the onsite attendance of a number of different external stakeholders during assessment and/or investigation of remains.

Project Managers may also be advised to liaise with local church/religious groups and the media to manage community issues arising from the find. Additional investigations may be required to identify living descendants, particularly if the remains are to be removed and relocated.

If exhumation of the remains (from a formal burial or a vault) is required, Project Managers should also be aware of additional approval requirements under the *Public Health Act 1991* (NSW). Specifically, Sydney Metro may be required to apply to the Director General of NSW

Department of Health for approval to exhume human remains as per Clause 26 of the *Public Health (Disposal of Bodies) Regulation 2002 (NSW)*¹⁰.

Further, the exhumation of such remains needs to consider health risks such as infectious disease control, exhumation procedures and reburial approval and registration. Further guidance on this matter can be found at the NSW Department of Health website.

In addition, due to the potential significant statutory and common law controls and prohibitions associated with interfering with a public cemetery, project teams are advised, when works uncover human remains adjacent to cemeteries, to confirm the cemetery's exact boundaries.

¹⁰ This requirement is in addition to heritage approvals under the *Heritage Act 1977*.

Appendix 5 - Archaeological/heritage advice checklist

The archaeologist/Aboriginal heritage consultant must advise the Sydney Metro Principal Manager Sustainability Environment and Planning (Program) of an appropriate archaeological or heritage management plan as soon as possible after an inspection of the site has been completed (see Step 4). An archaeological or heritage management plan can include a range of activities and processes, which differ depending on the find and its significance.

In discussions with the archaeologist/Aboriginal heritage consultant the following checklist can be used as a prompt to ensure all relevant heritage issues are considered when developing this plan. This will allow the project team to receive clear and full advice to move forward quickly. Archaeological and/or heritage advice on how to proceed can be received in a letter or email outlining all relevant archaeological and/or heritage issues.

	Required	Outcome/notes
Assessment and investigation		
• Assessment of significance	Yes/No	
• Assessment of heritage impact	Yes/No	
• Archaeological excavation	Yes/No	
• Archival photographic recording	Yes/No	
Heritage approvals and notifications		
• AHIP, section 140, section 139 exceptions etc.	Yes/No	
• Regulator relics/objects notification	Yes/No	
• Notification to Sydney Trains for s170 heritage conservation register	Yes/No	
• Compliance with CEMP or other project heritage approvals	Yes/No	
Stakeholder consultation		
• Aboriginal stakeholder consultation	Yes/No	
Artefact/heritage item management		
• Retention or conservation strategy (e.g. items may be subject to long conservation and interpretation)	Yes/No	
• Disposal strategy	Yes/No	
• Short term and permanent storage locations (interested third parties should be consulted on this issue).	Yes/No	
• Control Agreement for Aboriginal objects	Yes/No	

Appendix 6 - Template notification letter

Insert on TfNSW letterhead
Select and type date]
[Select and type reference number]

XXX

Manager, Conservation
Heritage Division, Office of Environment and Heritage
Locked Bag 5020
Parramatta NSW 2124

[Select and type salutation and name],

Re: Unexpected heritage item discovered during Sydney Metro activities.

I write to inform you of an unexpected [select: relic, heritage item or Aboriginal object] found during Sydney Infrastructure and Services construction works at [insert location] on [insert date] in accordance with the notification requirement under select: section 146 of the *Heritage Act 1977* (NSW). [Where the regulator has been informally notified at an earlier date by telephone, this should be referred to here].

NB: On finding Aboriginal human skeletal remains this letter must also be sent to the Commonwealth Minister for the Environment in accordance with notification requirements under section 20(1) of the *Aboriginal and Torres Strait Islander Heritage Protection Act 1984* (Commonwealth).

[Provide a brief overview of the project background and project area. Provide a summary of the description and location of the item, including a map and image where possible. Also include how the project was assessed under the *Environmental Planning and Assessment Act 1979* (NSW) (e.g. Part 5). Also include any project approval number, if available].

Sydney Metro [or contractor] has sought professional archaeological advice regarding the item. A preliminary assessment indicates [provide a summary description and likely significance of the item]. Please find additional information on the site recording form attached.

Based on the preliminary findings, Sydney Metro [or contractor] is proposing [provide a summary of the proposed archaeological/heritage approach (e.g. develop archaeological research design (where relevant), seek heritage approvals, undertake archaeological investigation or conservation/interpretation strategy). Also include preliminary justification of such heritage impact with regard to project design constraints and delivery program].

The proposed approach will be further developed in consultation with a nominated Office of Environment and Heritage staff member.

Should you have any feedback on the proposed approach, or if you require any further information, please do not hesitate to contact [Environment and Planning Project Manager] on (02) XXXX XXXX.

Yours sincerely

[Sender name]

Sydney Metro Principal Manager Sustainability Environment and Planning (Program) [Attach the archaeological/heritage management plan and site recording form]