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Mr Stuart Hodgson
Principal Manager
Program Sustainability Environment & Planning
Sydney Metro, Transport for NSW
PO Box 588
North Ryde BC NSW 1670

Our ref: SSI 15_7400

Dear Mr Hodgson

Sydney Metro City & Southwest Chatswood to Sydenham (SSI 15_7400): Approval of the Early Works (Demolition Package 1 – Delta Group) Construction Environmental Management Plan, Construction Noise and Vibration and Heritage sub-plans and Construction Noise and Vibration Monitoring Plan under conditions C8 and C13.

I refer to your submission of the Early Works (Demolition Package 1 – Delta Group) Construction Environmental Management Plan (CEMP), the Construction Noise & Vibration Management sub-plan (CNVMP), Construction Noise and Vibration Monitoring Plan and Heritage Management sub-plan for Delta Group's demolition package of works in accordance with conditions C8 and C13. I note these documents apply to demolition at the following sites: Victoria Cross, Pitt Street Station northern shaft, Waterloo Station, Marrickville Dive Site, Chatswood dive site and Crows Nest Station. I also note further revisions to these documents, responding to the Department's detailed comments and requirements.

The Department has reviewed the updated CEMP and other above-listed documents, and considers they satisfactorily address the requirements of conditions C8 and C13 for all of the above sites *except* Victoria Cross, subject to the requirements set out in **Attachment A** to this letter.

In relation to the Victoria Cross site, I note your letter of 29 May 2017 requesting deferral of the approval of the CEMP and sub-plans for this site pending resolution of site-specific issues. This approach is considered acceptable at this stage. Please ensure you continue to engage the Department on the management of issues at this site, and once resolved, seek the Department's further approval prior to commencing construction at Victoria Cross.

It is also noted that the Community Communication Strategy (Early Works) and Out of Hours Works (OOHW) Protocol are attached to the CNVMP. Please be advised that this approval of the CNVMP does not extend to the approval of the Community Communication Strategy (Early Works) and OOHW Protocol, which are subject to ongoing review and consideration under conditions B3 and E47 respectively. The CNVMP appendices should be marked as draft and updated following approval of these documents to reflect the most recent version of these documents.

On this basis, in accordance with conditions C8 and C13, I approve the following documents subject to the matters in **Attachment A** being satisfactorily addressed:

Management Plan/sub-plan	Condition
<i>Construction Environmental Management Plan (Rev 5 dated 28 April 2017)</i>	C8
<i>Construction Noise and Vibration sub-plan (Rev G dated 28 May 2017), incorporating Construction Noise and Vibration Monitoring Program</i>	C8, C13
<i>Construction Heritage sub-plan (Rev 5 dated 24 April 2017)</i>	C8

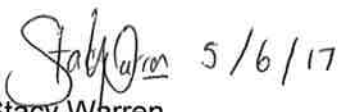
Please ensure that a final copy of all updated plans is provided to the Department for information, and all plans are made available at site and uploaded to the project's website.

You are also reminded that if there is any inconsistency between the approved plans and the conditions of the approval, then the requirements of the conditions of approval will prevail.

You are further reminded that Construction Traffic Management Plans (CTMPs) must be prepared for each construction site in consultation with the Traffic and Transport Liaison Group, and submitted to the RMS for approval following Sydney Coordination Office endorsement before construction commences at the relevant construction site, in accordance with condition E82. These CTMPs must be consistent with the Construction Traffic Management Framework (CTMF) approved under condition E81. The Staging Plan should be amended, where relevant, to reflect the fact that CTMPs are proposed to cover construction traffic related issues, rather than Traffic Management sub-plans under the CEMP.

If you have any further queries or require clarification on this matter, please contact Karl Fetterplace, Senior Planner - Infrastructure Management on 9274 6263 or by email karl.fetterplace@planning.nsw.gov.au.

Yours sincerely

 5/6/17
 Stacy Warren
Director Infrastructure Management
as delegate of the Secretary

Attachment A – requirements of approval

1. Construction Environmental Management Plan (CEMP)

- Please prepare an Environmental Incident Classification and Reporting Procedure specifically for the Chatswood-Sydenham component of the project to address the requirements of condition C2(g)ii.
- In accordance with section 4.5 of the CEMP, the Environmental Control Maps at Appendix I must be updated progressively as site information and work methods for each become available, including machinery and vehicle parking, fuel and chemical stores, and restrictions on traffic movement.
- Please update this plan to ensure that a routine six-monthly review is undertaken.
- Please ensure all references to a Traffic Management sub-plan are clarified to state that the reference is to a Construction Traffic Management Plan, as referred to in condition E82.
- Please ensure that the CEMP is updated to reflect required updates for the sub-plans, as far as relevant.

2. Construction Noise and Vibration Management Plan (CNVMP)

- Include a commitment to fulfil the requirements relating to the identification of affected properties and associated notifications within the site-specific CNVISs.
- Update this plan to include a routine six-monthly review.
- In Tables 9 and 10, bold the representative EIS Monitoring Locations in Table 9 in order to assist in the reading of RBLs and NMLs across Table 9 and 10.
- Please update, as necessary, to ensure this document is consistent with the Construction Noise and Vibration Strategy (CNVS) and Addendum A to the CNVS once approved.



Contact: Karl Fetterplace
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Email: karl.fetterplace@planning.nsw.gov.au

Mr Tim Parker
Project Director
Sydney Metro, Transport for NSW
PO Box 588
North Ryde BC NSW 1670

Our ref: SSI 15_7400

Dear Mr Parker

Sydney Metro City & Southwest Chatswood to Sydenham (SSI 15_7400): Health Risk Assessment and Demolition Approval for Victoria Cross Site

Thank you for your letter of 13 June 2017 submitting the *Review of Health Risk Issues for Childcare – Sydney Metro Demolition Activities* (Review of Health Risks) for the Only About Children (OAC) childcare centre next to the Victoria Cross demolition site and requesting approval to commence demolition works at this site.

The Department has carefully considered the Review of Health Risks, and is satisfied it has adequately considered the likely risks for the OAC childcare centre and sets an appropriate management framework to respond to these risks. Please ensure the recommendations and supporting measures from the Review of Health Risks are carefully implemented during demolition works at the site.

Further to the Department's conditional approval of 5 June 2017, please update the Early Works (Demolition Package 1 – Delta Group) Construction Environmental Management Plan (CEMP), the Construction Noise & Vibration Management sub-plan (CNVMP), Construction Noise and Vibration Monitoring Plan and Heritage Management sub-plan for Delta Group's demolition package to include these recommendations, where relevant. The updated documents should be reviewed and endorsed by the Acoustics Advisor and Environmental Representative (where relevant), and submitted to the Department for information.

It is also noted that under condition E33 you are required to prepare a Construction Noise and Vibration Impact Statement (CNVIS) for each construction site (including Victoria Cross), before construction noise and vibration impacts commence. The CNVIS for Victoria Cross must include the specific mitigation measures identified in the Review of Health Risks and any other measures identified through consultation with affected sensitive receivers, including the OAC childcare centre. It must also set appropriate noise management levels considering the Interim Construction Noise Guideline, the Review of Health Risks, the Demolition Noise & Vibration Management Plan and the conditions of approval. The CNVIS must be prepared in consultation with the Environmental Representative and endorsed by the Acoustics Advisor before implementation.

I also note condition E34 requires that noise generating works near potentially affected sensitive receivers must not be timetabled within 'sensitive periods', unless other reasonable arrangements to the affected institution are made at no cost to the affected institution or as otherwise approved by the Secretary. The Department understands that excessively noisy works for the demolition of the Tower Square building, such as hammering, concrete cutting and sawing will not be undertaken during the standard opening hours of the OAC childcare centre. Arrangements for future works will be subject to further consultation with affected sensitive receivers. You must

ensure that all other sensitive receivers potentially affected by noise generating works are identified and appropriately managed.

Please also ensure the commitments detailed in the Alan Morris (Delivery Director, TSE, Sydney Metro, City & Southwest) email of 22 June 2017 are carefully implemented, and Sydney Metro continues to liaise closely with the OAC childcare centre during demolition works.


Based on the above requirements, the following documents are approved to also apply to the Victoria Cross site:

Management Plan/sub-plan	Condition
<i>Construction Environmental Management Plan (Rev 5 dated 28 April 2017)</i>	C8
<i>Construction Noise and Vibration sub-plan (Rev G dated 28 May 2017), incorporating Construction Noise and Vibration Monitoring Program</i>	C8, C13
<i>Construction Heritage sub-plan (Rev 5 dated 24 April 2017)</i>	C8

You are further reminded that if there is any inconsistency between the approved documents and the conditions of the approval, then the requirements of the conditions of approval will prevail.

If you have any further queries or require clarification on this matter, please contact Karl Fetterplace, Senior Planner - Infrastructure Management on 9274 6263 or by email karl.fetterplace@planning.nsw.gov.au.

Yours sincerely

 23/6/17
Stacy Warren
Director Infrastructure Management
as delegate of the Secretary

Mr Stuart Hodgson
Principal Manager,
Program Sustainability Environment & Planning
Sydney Metro
Transport for NSW
PO Box 588
NORTH RYDE BC NSW 1670

19 May 2017

Ref: 170108_HMP-Metro

Dear Stuart

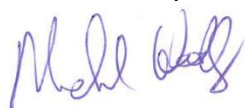
RE: Endorsement of Metropolitan Construction Environment Management Plan (CEMP) for Demolition Package B - Sydney Metro City & Southwest

Thank you for providing the following documents for Environmental Representative (ER) review and endorsement as required by the Condition of Approval C3 of the Sydney Metro City & Southwest project (SSI – 15_7400 January 9 2017).

- Metropolitan Heritage Management Plan (HMP) Sydney Metro City & Southwest (Revision 5 dated 17 May 2017).
- Evidence of consultation of the HMP (emails) with OEH and City of Sydney.

As an approved ER for the Sydney Metro City & Southwest project, I have reviewed and provided comment on earlier versions of this document and consider the referenced version appropriate for issue to DPE for their consideration.

Yours sincerely



Michael Woolley
Environmental Representative – Sydney Metro – City and South West

Heritage Management Sub Plan



Project Name:	Sydney Metro City & Southwest		
Client Names:	Transport for New South Wales		
Project Address:	Delta Group's six sites: 1. Chatswood; 2. Crow's Nest; 3. North Sydney; 4. Sydney; 5. Waterloo; and 6. Marrickville.		
Project Description/Scope:	Delta are undertaking the demolition of all above ground and in ground structures, excluding: 1. Concrete slabs on ground; and 2. Sections of walls/elements that are acting as retaining structures to the surrounding ground.		
Prepared by: (Project Engineer):	Name: Martin Hicks	Signature:	Date: 06/03/17
Reviewed by: (QSE Manager)	Name: Kevan Zulu	Signature:	Date: 06/03/17
Authorised By (Project Director):	Name: Ben Shum	Signature:	Date: 06/03/17
Project Manager (Responsible for Implementation):	Name:	Signature:	Date:

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2 AUTHORISATION AND CONTROL

2.1 Authorisation

This Plan is authorised by the Project Director. All project personnel are to ensure that their work activities and those of Project Consultants, Contractors and Suppliers are carried out in accordance with the requirements of this Plan.

2.2 Distribution

This Plan is a Controlled Document and must be distributed and revised under the guidance of the Project Manager. People who hold Controlled copies are responsible for maintaining their copies up-to-date.

2.3 Revision

The Project Director will monitor the implementation of this Plan and review the need for change or improvements having due regard to:

- Change in work scope, client comments etc.
- Internal and external audits
- Suggestions and comments from project personnel
- Incidence and frequency of non-conformance
- Necessity for corrective or preventative action
- Legal Update and Requirements
- Review by Delta Groups Management team
- Annual Review

All changes must be formally approved by the Project Director.

Changes to the recent revision will be highlighted.

The following table provides a record of amendments made to this document.

Rev	Date	Description	Page	Developed By	Approved By
0	23/02/2017	Draft – Issued for comment	All	M Hicks	Ben Shum
1	06/03/17	Amended following Sydney Metro review	All	M Hicks	Ben Shum
2	30/03/17	Amended following comments from Heritage	All	M Stephenson	
3	03/04/17	Amended following comments from ER – unexpected finds	P14 app B	M Stephenson	
4	06/04/17	Sections 5.2 & 5.3 and 7 amended.	All	M Stephenson	
5	24/04/17	DPE comments included	all	M Stephenson	

Distribution Register

Rev No.	Date of Issue	Name of Recipient	Position / Organisation
0		Ben Shum	Project Director/ Delta
1		Peter O'leary	Snr Project Manager/ TfNSW
2			

3 INTRODUCTION

3.1 Purpose

This Heritage Management Sub Plan (HMSP) has been prepared by Delta Pty Ltd. (Delta) to comply with the Minister for Planning and Environment's Conditions of Approval (CoA) for the demolition phase of the Sydney Metro City & Southwest Project and to meet the requirements of Section 10 of the Sydney Metro Requirements – Environment (SMRE).

Delta has been engaged to carry out the demolition of buildings as described in Section 2.3. The demolition of these buildings and structures is defined in this HMSP as “the Project”.

This HMSP provides specific management measures to ensure that Delta's demolition works are carried out so as to manage heritage aspects of the Project in a responsible and sensitive manner.

Implementing the HMSP effectively will ensure that the Project meets regulatory and contract requirements in a systematic manner and continually improves its performance.

3.2 Scope of the HMSP

This HMSP addresses heritage management associated with the Project. It covers all areas where physical works will occur and is applicable over the full duration of the Project.

All Delta staff and subcontractors are required to comply fully with the requirements of this HMSP.

The plan forms part of the project management documentation that has been prepared in accordance with the requirements of the Contract. The Project will be guided by Delta's Integrated Management System (IMS). Delta's IMS is certified as meeting the requirements of:

- AS/NZS4801 Occupational Health and Safety Management Systems;
- ISO14001 Environmental management; and
- ISO9001 Quality Management Systems.

3.3 Project Description

The Principal requires the demolition of approximately 60 buildings within and outside the Sydney CBD to make way for development of the Sydney Metro City & Southwest. The successful and timely completion of Delta's activities is required to facilitate works by the Tunnels and Stations Excavation Contractor (TSE Contractor) at the station locations and at the northern and southern dive sites.

The types of buildings to be demolished include high-rise commercial buildings and a mixture of low-rise residential, retail, commercial, mixed-use, and industrial buildings.

This HMSP addresses the demolition of buildings described within Section 3 of the Scope of Works and Technical Criteria. Delta notes that the Project must be carried out generally in accordance with the description provided in the Environmental Impact Statement as amended by the Preferred Infrastructure Report and the Conditions of Approval.

Sydney Metro will advise Delta of the items to be salvaged and the location where the items are to be delivered. Delta will then carry out this work prior to commencement of heavy structural demolition.

The proposed Chatswood and Sydenham alignment and the locations of proposed stations and operational ancillary infrastructure are shown in Figure 1.

The demolition sites are:

- Chatswood Dive, located on Pacific Highway and Bryson Street, Chatswood - Demolition Site CH;
- Crows Nest Station, located on Pacific Highway and Clarke Street, Crows Nest- Demolition Site CN;
- Victoria Cross Station, located on Miller Street, North Sydney - Demolition Site VC;
- Pitt Street Station North, located on Pitt, Castlereagh, and Park Streets, Sydney - Demolition Site PS;
- Waterloo Station, located on Botany Road and Cope Street, Waterloo - Demolition Site WA; and
- Marrickville Dive, located on Sydney Steel and Edinburgh Roads, and Murray Street, Marrickville - Demolition Site MA.

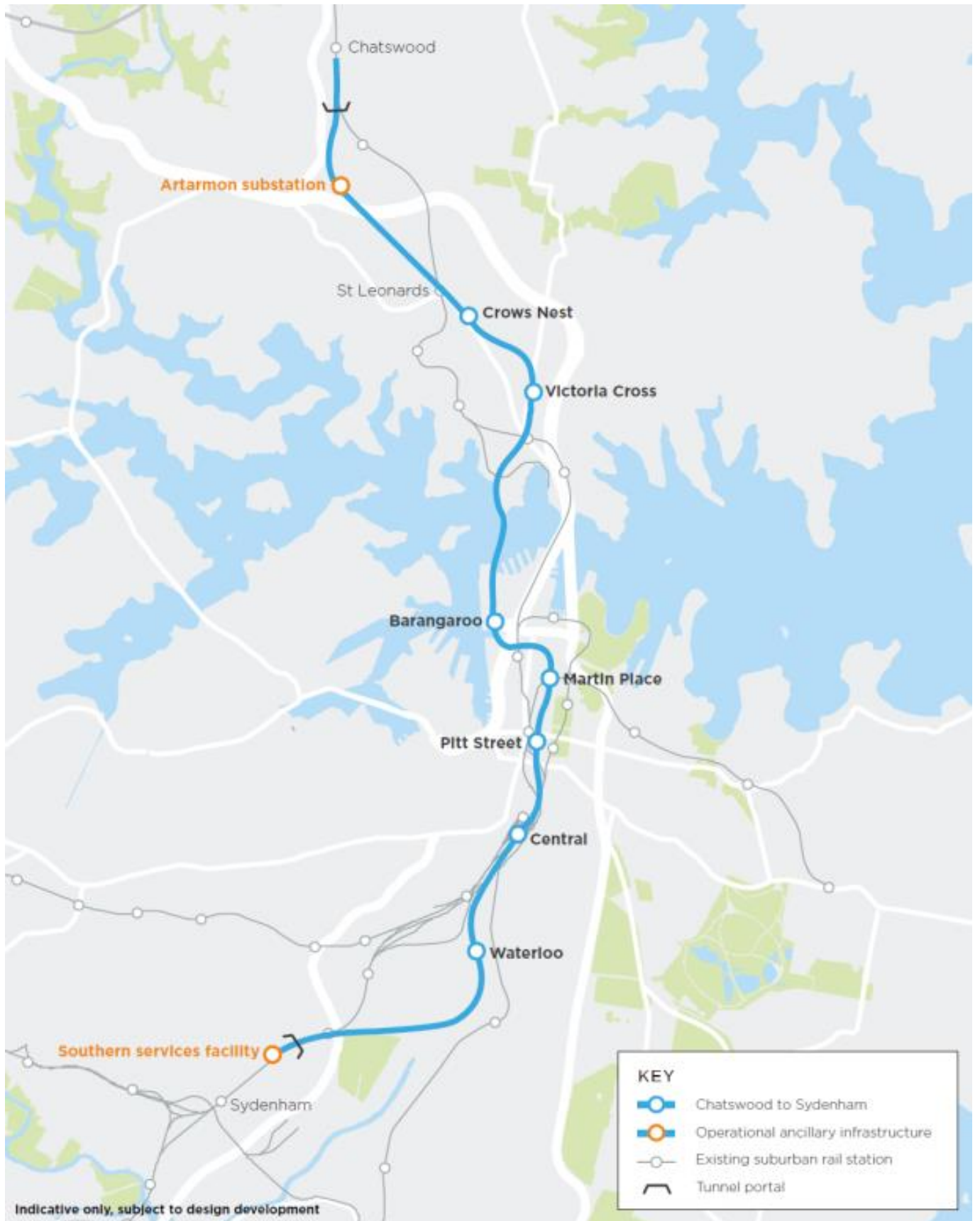


Figure 1 Chatswood to Sydenham Alignment

Source: Sydney Metro Chatswood to Sydenham Submissions and Preferred Infrastructure Report.

3.4 Policy and Objectives

Delta's Environmental Policy firmly establishes Delta's aims of minimising its environmental impact and furthering sustainability in all of its operations. Delta's Environmental Policy is:

Environmental Policy

Our goal is to improve the environments in which we operate.

This goal is not limited to minimising the environmental impact of our operations but includes taking active steps to reduce our energy usage, to reduce waste, to recycle everything we can and to be rigorous about safe disposal of any residual contaminants in strict compliance with regulatory requirements. This is at the heart of our business.

To achieve our goal, we will:

- Maintain an Integrated Management System which meets the requirements of AS/NZS ISO14001
- Constantly challenge the system for better ways of doing things
- Apply our philosophy of "Right First Time" but when we don't get it right we will learn from our mistakes
- Set objectives and targets to measure and improve our environmental performance
- Strive to prevent pollution, reduce waste and recover and recycle with the aim of exceeding all relevant regulatory standards

Delta's heritage objectives for the Project are provided in Section 10.1 of SMR E. The heritage objectives are:

- To embed significant heritage values through any architectural design, education or physical interpretation;
- To minimise impacts on items or places of heritage value;
- To avoid accidental impacts on heritage items; and
- To maximise worker's awareness of indigenous and non-indigenous heritage.

4 LEGAL AND OTHER REQUIREMENTS

4.1 Legislation

The key NSW environmental legislative requirement applicable to the heritage aspects of the Project are documented in the *Environmental Planning and Assessment Act 1979 and Heritage Act 1977*. Delta regularly reviews its legislative requirements in accordance with its Integrated Management System (IMS).

4.2 Guidelines and Other Documents

Guidelines, specifications, and policies relevant to heritage include:

- NSW Health Policy Directive, Exhumation of human remains (December 2013);
- Stabilising Stuff: A Guide for Conserving Archaeological Finds in the Field (Heritage Council of NSW 2012);
- Criteria for Assessment of Excavation Directors (Heritage Council of NSW 2011);
- Photographic Recording of Heritage Items using Film or Digital Capture (NSW Heritage Office 2006);
- Historical Archaeology Code of Practice (NSW Heritage Office 2006);
- Assessing Heritage Significance, NSW Heritage Manual (Heritage Council of NSW 2002);
- Statements of Heritage Impact, NSW Heritage Manual (Heritage Council of NSW 2002);
- Guidelines for Management of Human Skeletal Remains (NSW Heritage Office 1998); and
- How to Prepare Archival Recording of Heritage Items (NSW Heritage Office 1998).

4.3 Minister's Conditions of Approval and PIR Mitigation Measures

Delta notes that the Project must be carried out generally in accordance with the description provided in the Environmental Impact Statement (EIS) as amended by the Sydney Metro Chatswood to Sydenham Submissions and Preferred Infrastructure Report (PIR), and the SSI Conditions of Approval (CoA).

Table 1 Relevant CoA and Revised Environmental Mitigation Measures (REMM)

Requirement	Detail	Where addressed
CoA E10	The Proponent must not destroy, modify or otherwise physically affect any Heritage item not identified in documents referred to in Condition A1.	This has been addressed through Demolition Management Plan and Construction Noise and Vibration Management Plan.
CoA E12	Bus shelters to be temporarily removed at Victoria Cross and Blues Point must be reinstated prior to operation, in consultation with North Sydney Council.	This is not a component of the Delta demolition contract
CoA E13	The Proponent must prepare a Heritage Archival Recording Report, including photographic recording of the heritage items identified in documents referred to in Condition A1. Archival recording must include but not be limited to the following heritage items: (a) any component of the Blues Point Waterfront Group and the McMahons Point South heritage conservation area to be directly affected or altered, including vegetation and significant landscape features; (b) Hickson Road wall in the vicinity of proposed ventilation risers and skylights for Barangaroo Station or any other project elements to be located in front of the Hickson Road wall; (c) Martin Place, between Elizabeth and Castlereagh Streets, Sydney; (d) the Rolling Stock Officers' Garden, Rolling Stock Officers' Building and Cleaners' Amenities Building in Sydney Yard and any other component of the Sydney Terminal and Central Railway Stations group to be removed or altered; and (e) views from Mortuary Station before construction of the Sydney Yard Access Bridge.	Heritage Archival Recording Report Under the terms of Delta's contract with Sydney Metro, the Proponent is responsible for this condition. Delta will provide safe access reasonably required to enable compliance.
CoA E14	In addition to the archival recording as required by Condition E13, the Proponent must, prior to demolition, undertake external photography of all buildings and structures to be demolished, in consultation with and to the standards of the relevant Council. The recordings must be made available to the relevant Council.	Photography of external of buildings and structures to be demolished. Under the terms of Delta's contract with Sydney Metro, the Proponent is responsible for this condition. Delta will provide safe access reasonably required to enable compliance with this condition.
CoA E15	The Proponent must salvage items of heritage value from heritage listed buildings and structures to be demolished before demolition, and assess options for its sympathetic reuse (including integrated heritage displays) on the project or other options for repository, reuse and display. Suitable repository locations must be established in consultation with Relevant Council(s). Any State listed items or elements suitable for salvage must be determined in consultation with the Heritage Division of the OEH.	Section 5.5 Interpretation and Salvage The Proponent has identified which items are to be salvaged and suitable repository locations, see Appendix A Salvage report, in consultation with the Heritage Council of NSW and local councils. Delta has been advised by the Proponent of items to be salvaged and the location where the salvaged items are to be delivered by Delta.
CoA E16	The Proponent must prepare a Salvage Report, including photographic recording of the heritage items identified for salvage in documents referred to in Condition A1. The Salvage Report must include: (a) the internal heritage fabric removed from within the curtilage of Mowbray House, Chatswood; (b) the interior, exterior and setting of the shop at 187 Miller Street, North Sydney; (c) the fabric and setting of the North Sydney bus shelters; (d) the interior, exterior and setting of the 'Flat Building' at 7 Elizabeth Street, Sydney; (e) the heritage fabric of the existing Martin Place Station affected by	Section 5.5 Interpretation and Salvage Salvage Report for Jewelry Shop at 187 Miller St North Sydney Under the terms of Delta's contract with Sydney Metro, the Principal will comply with this condition. Delta will provide safe access reasonably

Requirement	Detail	Where addressed
	the project; and (f) directly impacted parts of the Congregational Church at Waterloo.	required to enable compliance with this condition.
CoA E17	The Archaeological Assessment Research Design Report (AARD) in the PIR must be implemented. Final Archaeological Method Statements must be prepared in consultation with the Heritage Council of NSW (or its delegate) before commencement of archaeological excavation works. The final methodology must: (a) provide for the detailed analysis of any heritage items discovered during the investigations; (b) include detailed site specific archaeological management and artefact management strategies; (c) include cored soil samples for soil and pollen for the Pitt Street site within the Tank Stream Valley; and (d) provide for a sieving strategy.	Archaeological Assessment Research Design Report Under the terms of Delta's contract with Sydney Metro, the Principal will comply with this condition. Delta will comply with this Condition where required to assist the Principal.
CoA E19	An Unexpected Heritage Finds Procedure must be prepared: (a) to manage unexpected heritage finds in accordance with any guidelines and standards prepared by the Heritage Council of NSW or OEH; and (b) by a suitably qualified and experienced heritage specialist. The procedure must be included in the AARD and must be implemented for the life of the project.	Unexpected Finds Procedure The Principal will comply with this condition. Delta will implement the Unexpected Heritage Finds Procedure as provided by the Principal.
CoA E20	In the event that a Relic is discovered, relevant construction must cease in the affected area and the Excavation Director must be notified and assess the finds, identify their significance level and provide mitigation advice according to the significance level and the impact proposed. Depending on the significance of the find, the Excavation Director must attend the site. The Secretary must be notified at the same time as the Heritage Council of NSW (or its delegate) of any Relic found. An Archaeological Relic Management Plan specific to the Relic must be prepared in consultation with the Heritage Council of NSW (or its delegate) to outline measures to be implemented to avoid and/or minimise harm to and/or salvage the Relic. Construction in the vicinity of the discovery must not recommence until the requirements of the ARMP have been implemented, in consultation with the Excavation Director. The Proponent must notify the Secretary in writing of the outcome of consultation with the Heritage Council of NSW.	Section 5.6 Unexpected Finds Procedure Unexpected Finds Procedure in Archaeological Assessment Research Design Report Delta will notify the Principal immediately that an unexpected heritage find is discovered and cease work in the affected area until the Principal notifies Delta that work may recommence. Under the terms of Delta's contract with Sydney Metro, the Principal will comply with this condition in all other respects. Delta will assist the Principal where required.
CoA E21	The Proponent must prepare a Heritage Interpretation Plan which identifies and interprets the key Aboriginal and Non-Aboriginal heritage values and stories of heritage items and heritage conservation areas impacted by the CSSI. The Heritage Interpretation Plan must inform the Station Design and Precinct Plan referred to in Condition E101. 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	Heritage Interpretation Plan Under the terms of Delta's contract with Sydney Metro, the Principal will comply with this condition.
Requirement	Detail	Where addressed
REMM NAH1	Archival recording and reporting of the following heritage items would be carried out in accordance with the NSW Heritage Office's How to Prepare Archival Records of Heritage Items (1998a), and Photographic Recording of Heritage Items Using Film or Digital Capture (2006): <ul style="list-style-type: none"> The internal heritage fabric and any non-original elements removed from within the curtilage of Mowbray House, Chatswood The interior, exterior and setting of the shop at 187 Miller Street, North Sydney The fabric and setting of the North Sydney bus shelters requiring removal and temporary relocation at Victoria Cross Station and Blues Point temporary site 	Archival Recording and Salvage Report produced by Principal Mowbray House not to be demolished as part of Delta's works. 187 Miller St Salvage Report attached in Appendix A of the Plan Bus Shelters will not be removed as part of Delta's works.

Requirement	Detail	Where addressed
REMM NAH2	The archaeological research design would be implemented. Significant archaeological findings would be considered for inclusion in heritage interpretation (as per NAH8) for the project and be developed in consultation with the relevant local council.	Archaeological Research Design to be undertaken by Principal.
REMM NAH3	An Exhumation Policy and Guideline would be prepared and implemented. It would be developed in accordance with the Guidelines for Management of Human Skeletal Remains (NSW Heritage Office, 1998b) and NSW Health Policy Directive – Exhumation of human remains (December, 2013). It would be prepared in consultation with NSW Heritage Office and NSW Health.	Exhumation Policy to be produced by Principal.
REMM NAH4	The method for the demolition of existing buildings and / or structures at Chatswood dive site, Victoria Cross Station, Martin Place Station, Pitt Street Station, Central Station and Waterloo Station would be developed to minimise direct and indirect impacts to adjacent and / or adjoining heritage items.	This has been addressed through Demolition Management Plan and Construction Noise and Vibration Management Plan.
REMM NAH5	Prior to total or partial demolition of heritage items at Victoria Cross and Martin Place stations, heritage fabric for salvage would be identified and reuse opportunities for salvaged fabric considered. This would include salvage and reuse of heritage tiles to be impacted at Martin Place Station.	Heritage Salvage Report for Victoria Cross has been prepared by Principal.
REMM NAH6	An appropriately qualified and experienced heritage architect would form part of the Sydney Metro Design Review Panel and would provide independent review periodically throughout detailed design.	Design Review not an element of Delta contract; to be facilitated by Principal.
REMM NAH7	The project design would be sympathetic to heritage items and, where reasonable and feasible, minimise impacts to the setting of heritage items. The detailed design for Martin Place Station and Central Station would be developed with input from a heritage architect.	Design not an element of Delta contract; to be facilitated by Principal.
REMM NAH8	Appropriate heritage interpretation would be incorporated into the design for the project 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.	Design not an element of Delta contract; to be facilitated by Principal.
REMM NAH9	A Central Station heritage interpretation plan would be developed and implemented. It would be consistent with the Central Station Conservation Management Plan (Rappoport and Government Architects Office, 2013) and in accordance with the guidelines identified in NAH8.	Central Station not an element of Delta contract.
REMM NAH10	The detailed design of the Sydney Yard Access Bridge would be carried out in accordance with the relevant specific element principles in the Design Guidelines.	SYAB not an element of Delta contract.
REMM NAH11	Except for heritage significant elements affected by the project, direct impact on other heritage significant elements forming part of the following items would be avoided: <ul style="list-style-type: none"> The Blues Point Waterfront Group (including the former tram turning circle, stone retaining wall, bollards and steps) The Millers Point and Dawes Point Village Precinct The existing Martin Place Station Sydney Terminal and Central Railway Stations group Sydney Yard (including the Shunters Hut and Prince Alfred Sewer). 	These locations are not part of the Delta contract.
REMM NAH12	Power supply works would be designed and constructed to avoid impacts to the Tank Stream and Bennelong Storm water Channel.	These locations are not part of the Delta contract.
REMM NAH13	The design and detailed construction planning of work at Central Station would consider the requirements of the Central Station Conservation Management Plan (Rappoport and Government Architects Office, 2013) and include consideration of opportunities for the retention, conservation and / or reuse of original and significant heritage fabric and movable heritage items. Consultation would be carried out with Sydney Trains and the Heritage Council of NSW during design development.	Central Station is not part of the Delta contract.

4.4 Sydney Metro Requirements

Sydney Metro Requirements for heritage are provided within SMR E. The relevant requirements addressed by this HMSP are:

Table 2 Relevant Sydney Metro Requirements

SMR E	Relevant requirement	Where addressed
10.1 (a)	<p>The following heritage management objectives will apply to construction:</p> <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 indigenous and non-indigenous heritage. 	Section 3.4 Policy and Objectives
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"> • Will be developed in consultation with Registered Aboriginal Parties (Indigenous Heritage only) and the NSW Heritage Council. 	Section 6.6 Consultation
	<ul style="list-style-type: none"> • The heritage mitigation measures as detailed in the environmental approval documentation. 	Section 4.3 Minister’s Conditions of Approval and PIR mitigation measures
	<ul style="list-style-type: none"> • The responsibilities of key project personnel with respect to the implementation of the plan. 	Section 5 Roles and Responsibilities
	<ul style="list-style-type: none"> • Procedures for interpretation of heritage values uncovered through salvage or excavation during detailed design. 	Section 6.4 Interpretation and Salvage
	<ul style="list-style-type: none"> • Procedures for undertaking salvage or excavation of heritage relics or sites (where relevant) and any recordings of heritage relics prior to works commencing that would affect them. 	Section 6.4 Interpretation and Salvage
	<ul style="list-style-type: none"> • 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 10 of the Construction Environmental Management Framework (CEMF) establishes ongoing Aboriginal and non-Aboriginal Heritage risk management measures. The relevant measures are provided in Table 2 of this HMSP. 	<p>Section 6.2 Heritage Management Procedures Summary</p> <p>CEMF section 10 – Heritage Management</p>
	<ul style="list-style-type: none"> • Procedures for unexpected heritage finds, including procedures for dealing with human remains. 	Section 6.5 Unexpected Finds
	<ul style="list-style-type: none"> • Heritage monitoring requirements. • Compliance record generation and management. 	<p>Section 8.2 Monitoring Procedure</p> <p>Section 9.1 Compliance Records</p>
10.2 (b)	The Contractor’s regular inspection will include checking of heritage mitigation measures.	Section 8.1 Site Inspections
10.2 (c)	<p>Compliance records will be retained by the Contractor. These will include:</p> <ul style="list-style-type: none"> • Inspections undertaken in relation to heritage management measures. • Archival recordings undertaken of any heritage item. • Unexpected finds and stop work orders. • Records of any impacts avoided or minimised through design or construction methods. 	Section 9.1 Compliance Records
10.3 (a)	<p>Examples of heritage mitigation measures include:</p> <ul style="list-style-type: none"> • Any heritage item not affected by the works will be retained and protected throughout construction. • Implement unexpected heritage find procedures for Indigenous and non-Indigenous heritage items. 	Section 6 Heritage Management

5 ROLES AND RESPONSIBILITIES

Table 3 provides the key roles and responsibilities under the HMSP.

Table 3 Key Roles and Responsibilities

Project Role	Responsibilities
Project Director	<ul style="list-style-type: none"> • Primary contact with the Principal's Representative on all aspects of the Project. • Approve and ensure implementation of this HMSP. • Approve monthly reports and issue to the Principal.
Project Manager	<ul style="list-style-type: none"> • Implement the HMSP. • Lead by example. • Immediately notify the Nominated Representative in the event of an unexpected find. • Identify heritage management opportunities and support those identified by others. • Organise on-site personnel with regard to their responsibilities within the HMSP. • Carry out periodic audits of the incident response process. • Manage non-conformances and initiate corrective action as required. • Review reports, and follow up on recommendations.
Demolition Site Manager	<ul style="list-style-type: none"> • Implement the HMSP. • Lead by example. • Immediately shut down the works in the event of an unexpected find. • In the absence of the Project Manager, immediately notify the Nominated Representative in the event of an unexpected find • Provide advice and assistance on the HMSP to employees. • Identify heritage management opportunities and support those identified by others. • Decide when training is required. • Undertaking inspection of the contracted or planned works to ensure that HMSP measures are implemented and effective. • Carry out weekly toolbox talks. • Manage the Site Folder and ensure all HMSP requirements are compiled.
Environment and Sustainability Manager	<ul style="list-style-type: none"> • Maintain the HMSP. • Update the HMSP as required. • Lead by example. • Ensure relevant information from the HMSP is incorporated into project inductions. • Prepare monthly reports and submit to the Project Director. • Identify heritage management opportunities and support those identified by others. • Communicate the requirements of the HMSP and ensure these are addressed. • Ensure subcontractor documentation captures the requirements of the HMSP. • Conduct audits and inspections of the site. • Participate in Principal-led site audits. • Attend toolbox meetings and inductions. • Ensure that heritage management defects are identified, actioned and closed out. • Attend on-site meetings to ensure heritage is raised for review.
Environmental Representative	<p>From commencement of construction until completion of construction, the approved ER must:</p> <p>(a) Receive and respond to communications from the Secretary in relation to the environmental performance of the CSSI;</p> <p>(b) Consider and inform the Secretary on matters specified in the terms of this approval;</p> <p>(c) Consider and recommend any improvements that may be made to work practices to avoid or minimise adverse impact to the environment and to the community;</p> <p>(d) Review all documents required to be prepared under the terms of this approval, ensure they address any requirements in or under this approval and if so, endorse</p>

Project Role	Responsibilities
	<p>them before submission to the Secretary (if required to be submitted to the Secretary) or before implementation (if not required to be submitted to the Secretary);</p> <p>(e) Regularly monitor the implementation of all documents required by the terms of this approval for implementation in accordance with what is stated in the document and the terms of this approval;</p> <p>(f) Notify the Secretary of an incident in accordance with Condition A41 of this approval;</p> <p>(g) As may be requested by the Secretary, help plan, attend or undertake Department audits of the CSSI, briefings, and site visits;</p> <p>(h) If conflict arises between the Proponent and the community in relation to the environmental performance of the CSSI, follow the procedure in the Community Communication Strategy approved under Condition B3 of this approval to attempt to resolve the conflict, and if it cannot be resolved, notify the Secretary;</p> <p>(i) Review any draft consistency assessment that may be carried out by the Proponent, and provide advice on any additional mitigation measures required to minimise the impact of the work;</p> <p>(j) Consider any minor amendments to be made to the CEMP, CEMP sub-plans and monitoring programs that comprise updating or are of an administrative nature, and are consistent with the terms of this approval and the CEMP, CEMP sub-plans and monitoring programs approved by the Secretary and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of this approval;</p> <p>(k) Assess the impacts of minor ancillary facilities as required by Condition A18 of this approval; and</p> <p>(l) Prepare and submit to the Secretary and other relevant regulatory agencies, for information, a monthly Environmental Representative Report detailing the ER's actions and decisions on matters for which the ER was responsible in the preceding month (or other timeframe agreed with the Secretary). The Environmental Representative Report must be submitted within seven (7) days following the end of each month for the duration of works and construction of the CSSI, or as otherwise agreed with the Secretary.</p> <p>The Environmental Representative will interface with the Environment and Sustainability Manager during ER site inspections and in addressing ER correspondence or enquiries. The Environment and Sustainability Manager will seek the endorsement of the ER for management plans, consistency assessments, and minor amendments to be made to the CEMP and its Sub Plans.</p>

6 HERITAGE MANAGEMENT

6.1 Existing Environment

The EIS and PIR assessed the potential impacts on non-Aboriginal heritage resulting from activities during the construction and operational phase of the City and South West project. No Aboriginal heritage sites were identified within the projects awarded to Delta, however, Aboriginal heritage sites were identified in the broad project locality at distances greater than 100 metres. In relation to non-Aboriginal heritage, the PIR identified the following buildings of the Project for which specific procedures will be developed by Delta:

- Mowbray House, Chatswood;
- 187 Miller Street, North Sydney; and
- The Congregational Church at Waterloo.

Further to the above, non-Aboriginal heritage items have been identified on three adjoining buildings and will be managed and monitored throughout the project time line as detailed in section 5.3.

- 169 Castlereagh – Masonic hotel
- 105-153 Miller street – MLC building
- 248A -250 Pitt Street – National building

Sydney Metro has prepared a Salvage Report that includes photographic recordings of the heritage items identified above prior to commencement of works. A copy of the Salvage Report is provided in **Appendix A**.

6.2 Heritage Management Procedures Summary

6.2.1 Mowbray House

Mowbray House is located within the footprint of CH at 339 Mowbray Road, Artarmon. It will be retained and protected by Delta during the demolition stage of the Project.

Delta will carry out vibration monitoring throughout the Project at sites identified in the Noise and Vibration Management Sub Plan.

Where Sydney Metro requires access to Mowbray House for photographic recordings, Delta will provide Sydney Metro and its contractors with safe access to enable compliance with this requirement.

Delta will implement an unexpected finds procedure for the unexpected discovery of indigenous and non-indigenous heritage items and human remains throughout Portion CH.

6.2.2 187 Miller Street

187 Miller Street is the former jewellery store in North Sydney. It will be demolished by Delta during the Project.

Sydney Metro requires access to 187 Miller Street for photographic recordings and identification of heritage items. Delta will provide Sydney Metro and its contractors with safe access to enable compliance with this requirement.

The Principal will advise Delta of the identified heritage items to be salvaged by Delta and the location where those salvaged items are to be delivered. To date, the Principal has not provided this advice to Delta.

Delta will implement an unexpected finds procedure for the unexpected discovery of indigenous and non-indigenous heritage items and human remains throughout Portion VC.

6.2.3 169 Castlereagh Street

The Masonic Hotel with a heritage listed awning adjoins 175 Castlereagh, part of the Pitt street demolition package.

Delta have engaged a Heritage consultant to review the works taking place that could impact the Heritage awning to ensure all necessary mitigation is put in place.

Delta will carry out noise & vibration monitoring throughout the Project at sites identified in the Noise and Vibration Impact statement and approved by the heritage consultant as per CoA E31.

Trigger levels will be set and when reached site management will be alerted, all vibratory work is to cease until methodology is reassessed to mitigate for any further vibration that may affect the heritage item.

6.2.4 248A -250 Pitt Street

The National Building is a prominent high rise building within its Pitt Street block, sitting adjacent to the Pitt street demolition package.

The EIS notes minor impact from vibration could result to Delta's work, Delta will carry out noise & vibration monitoring throughout the Project at sites identified in the Noise and Vibration Impact statement and approved by the heritage consultant as per CoA E31.

Trigger levels will be set and when reached site management will be alerted, all vibratory work is to cease until methodology is reassessed to mitigate for any further vibration that may affect the heritage item.

6.2.5 105-153 Miller street

The MLC Building is located 300m due north on the North Sydney station along miller street and adjacent to 155 Miller street, which sits within the Victoria Cross 2 Demolition package. The MLC building will be retained and protected and monitored by Delta and their noise and vibration consultant during the demolition stage of the Project.

Delta will carry out noise & vibration monitoring throughout the Project at sites identified in the Noise and Vibration Impact statement and approved by the heritage consultant as per CoA E31.

Trigger levels will be set and when reached site management will be alerted and all vibratory work is to cease until methodology is reassessed to mitigate for any further vibration that may affect the heritage item.

6.2.6 Congregational Church

The Waterloo Congregational Church is located alongside the footprint of WA at 103 Botany Rd Waterloo. It will be retained and protected by Delta during the demolition stage of the Project.

Delta will carry out vibration monitoring throughout the Project at sites identified in the Noise and Vibration Management Sub Plan.

Where Sydney Metro requires access to the Congregational Church for photographic recordings, Delta will provide Sydney Metro and its contractors with safe access to enable compliance with this requirement.

Delta will implement an unexpected finds procedure for the unexpected discovery of indigenous and non-indigenous heritage items and human remains throughout Portion WA.

6.3 Protection of Adjacent Heritage Buildings

Class A hoarding will be erected around the perimeter of Mowbray House by Delta's subcontractor and in accordance with Delta's Health and Safety Management Plan.

The hoarding will provide both a physical barrier and a visual screen between the building and Delta's demolition works, protecting the building from dust and debris generated by demolition.

Scaffolding will be erected between the Waterloo Congregational Church and the adjacent commercial unit at 111 Botany Road. Scaffolding will be erected in accordance with Delta's Procedure 33 Scaffold Management and Health and Safety Management Plan.

Shade cloth will be installed on to the scaffold to provide a visual barrier to the works, and to protect the Congregational Church from dust and debris generated by demolition.

The design of all temporary works will require approval from the Principal in relation to urban design and visual impacts. Delta will issue the design to Sydney Metro for approval prior to installation. This approval is a Hold Point within the Project Construction Environmental Management Plan.

Delta will regularly inspect and maintain all construction hoardings and scaffolding. These will be kept clean and free of dust and dirt. Graffiti on construction hoardings or scaffolding will be removed or painted over promptly.

Site specific delta induction to include heritage protection. A heritage briefing will be given to operatives working adjacent to heritage prior to any works commencing. Works adjacent to heritage awning at 169 Castlereagh will be carried out by hand and electrical tools only. All works will be managed by an experienced supervisor.

Delta will engage a Noise and vibration specialist and heritage consultant to advise on monitoring locations as per Condition of Approval 31. This mitigation strategy will be pertinent to all adjacent heritage items not within the demolition footprint.

Condition of Approval E35 requires that alternatives to rock hammering are reviewed with the aim of minimising impacts on sensitive receivers. Table 4 outlines the tools that shall be used to limit the use of hydraulic hammers on those sites where heritage buildings close to the Project are to be retained.

Table 4 Alternatives to Rock Hammering

Site	Tools to be used to limit the use of hydraulic hammers
Chatswood	The use of hydraulic concrete shears in lieu of hammers/rock breakers.
Waterloo	The use of hydraulic concrete shears in lieu of hammers/rock breakers for removal of perimeter walls.

6.4 Interpretation and Salvage

Heritage Interpretation has been carried out by Sydney Metro as documented in the salvage report found in appendix A. Prior to any Salvage work taking place by Delta, all work methodologies will be checked by a qualified heritage consultant. All Heritage salvage work will take place prior to demolition starting. Where undocumented heritage is found, or deemed to be found, operatives will follow the unexpected finds procedure as prescribed by TfNSW in accordance with CoA E19.

6.5 Unexpected Finds Procedure

6.5.1 Unexpected Finds

An Unexpected Heritage Finds Procedure has been developed by the TfNSW for application across the Project, see appendix B. Any unexpected archaeological finds will be managed in accordance with the procedure developed within the Sydney Metro City & Southwest Chatswood to Sydenham Historical Archaeological Assessment and Research Design. When the Principal provides Delta with the Project Unexpected Finds Procedure, Delta will update this HMSP and implement the procedure for the life of the Project.

In the first instance, Delta will verbally notify the Sydney Trains Nominated Representative to seek advice as soon as possible after Delta becomes aware of the unexpected find. Works in the vicinity of the unexpected find will cease immediately. If human skeletal remains are found during the Project, works will cease immediately across the whole of the site.

If human skeletal remains are identified any archaeological investigation would be undertaken by the Principal in accordance with the Skeletal Remains: Guidelines for Management of Human Skeletal Remains (Heritage Council of NSW, 1998). An Exhumation Policy for the Project will be developed by the Principal, where necessary, and will be adhered to by Delta.

The unexpected finds procedure will apply to the areas nominated in the Historical Archaeological Assessment and Research Design, and be provided by TfNSW.

The Unexpected Finds Procedure is illustrated in Figure 2.

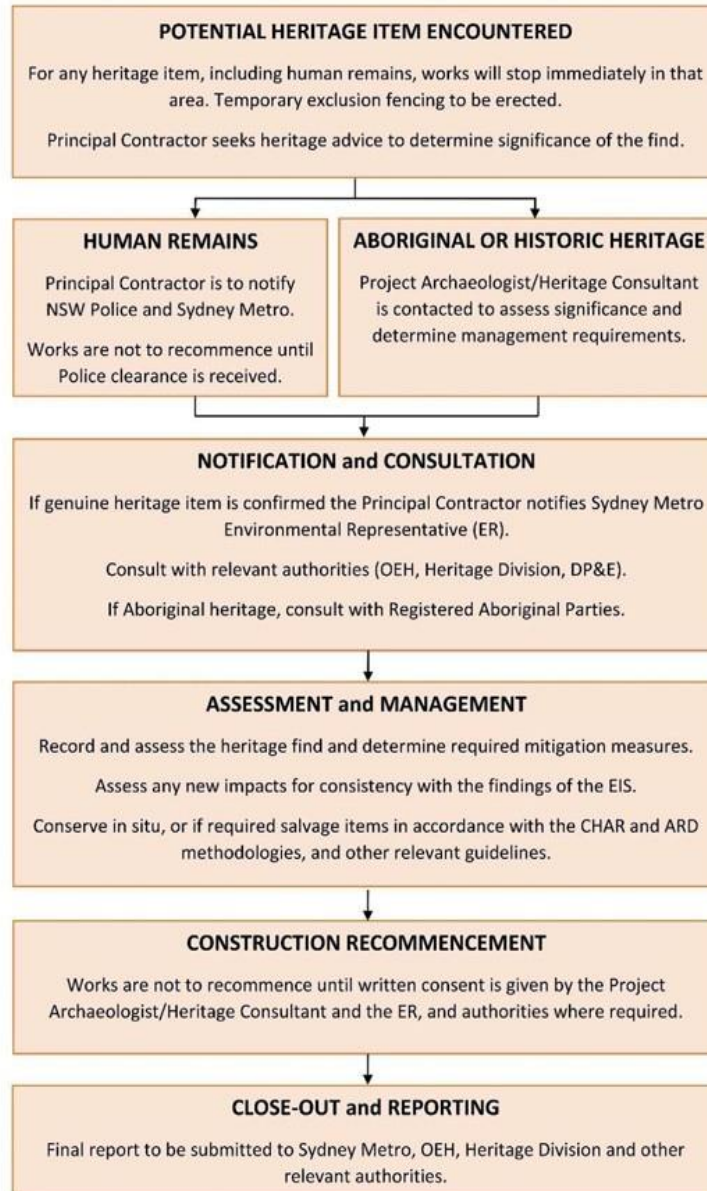


Figure 2 Unexpected Finds Procedure

Source: Sydney Metro City & Southwest Chatswood to Sydenham Historical Archaeological Assessment and Research Design

6.5.2 Notifiable Events

A notifiable event is any environmental incident or issue that triggers a specific statutory requirement to notify a regulatory authority. Notifiable events that are relevant to the heritage aspects of the Project are:

- Discover relic: Condition E20 of the CoAs requires the Excavation Director to be notified to assess the finds, identify their significance level, and provide mitigation advice according to the significance level and the impact proposed;
- Discover Aboriginal remains: Section 20 of the *National Parks & Wildlife Act 1974* requires notification to be made in writing to the Director-General of EPA within a reasonable time after becoming aware of the find; and
- Discover aboriginal relic: Section 91 of the *Commonwealth Aboriginal & Torres Strait Islanders Heritage Protection Act 1984* requires notification to be made in writing to the Commonwealth Minister of the Environment as soon as practicable after becoming aware of the find.
-

6.5.3 Environmental Incidents

An environmental incident is an occurrence or set of circumstances, as a consequence of which pollution or an adverse environmental impact has occurred or is likely to occur. An adverse environmental impact includes damage to a heritage item.

Where damage to a heritage item results from Delta's activities, the Environmental Incident Response procedure within Section 5.2 of the Pollution Incident Response Management Sub Plan will apply. Delta will verbally notify the Sydney Trains Nominated Representative as soon as possible after Delta becomes aware of an incident. The Nominated Representative will provide advice to Delta on the classification of the incident and whether notification to any regulatory authority is required.

6.6 Consultation

The HMSP has been provided to relevant stakeholders including Local Council, NSW Department of Environment and Planning (DP&E) and the NSW Heritage Council.

Ongoing consultation will be undertaken throughout the Project, including with the NSW Heritage Council, where required, and the Sydney Metro Design Review Panel and will be amended as required during the Project.

Please see appendix C for a list of stakeholders consulted and their responses with prior to submitting to planning.

7 TRAINING

IMS Procedure 03 Competency, Induction and Training requires that all persons (permanent and temporary employees and contractors) who undertake work on a Delta Group site must as a minimum hold a current:

- Generic Construction Industry OHS Induction;
- Delta Group induction;
- Client induction (as required);
- SWMS, toolbox, and SOP inductions;
- Site Management Plan/s induction; and
- Site specific inductions.

7.1.1 Site inductions

Site Inductions will be conducted by the Work Health and Safety Manager, Site Manager, or designated person. Workers, including Delta employees, contractors, sub-contractors, and suppliers, must undergo Site Induction training and be deemed competent prior to being given approval to access Delta's Project sites.

Visitors and consultants who are to be escorted at all times, or who will not undertake work outside the Site Office area, will not need to undergo the Site Induction.

Site Induction training will inform all site personnel about their requirements and responsibilities for heritage management under the HMSP, the protection of adjacent heritage and other buildings, operation of vibration-generating equipment alongside heritage buildings, and specific requirements 187 Miller Street prior to its demolition.

7.1.2 Management Plan Training

Management Plan training will be carried out prior to personnel commencing work on the Project. Management Plan training will include the provisions of the Delta HMSP.

Refresher training will be carried out after six months following commencement of the Project, and as required, when site inspections, audits, task observations and the like uncover work practices not in accordance with the Plan.

7.1.3 Toolbox Talks

Toolbox talks will be conducted weekly as a minimum, and will be used to present the status of safety and environmental performance, incidents, safety and security alerts, lessons learnt, bulletins, messages, etc.

The Environment and Sustainability Manager will participate in the weekly toolbox talks to emphasise aspects of environmental management or to provide updates when there are changes to legislation, work methods, or scope. Following any heritage related incident, the Environment and Sustainability Manager will provide an incident-specific toolbox lesson for all site personnel.

Delta's IMS Form 054 Toolbox Meeting will be used to record all toolbox talks.

8 MONITORING AND INSPECTION

8.1 Site Inspections

Delta will carry out surveillance of protection measures, including checking of heritage mitigation measures, in accordance with Procedure 24 Inspection, Monitoring and Measurement. Regular site inspections are carried out by the Site Manager, and recorded on SEF 049 Site Inspection Report. Site inspections cover the whole of the Portion, including the site perimeter, and assess progress, risk, opportunities, and quality, safety, and environmental aspects of the Project. Daily Pre-start inspections are carried out by the Site Manager and recorded on Safety and Environmental Form SEF 047 Site Diary - Daily pre-start.

Periodic inspections by Delta's Environmental and Sustainability Manager (or delegate) will be carried out to verify the adequacy of all environmental measures. This will be documented in SEF 049 Site Inspection Report.

A timetable of site inspections is provided in Table 5 below.

Table 5 Site Inspection Timetable

Inspection	Frequency	Content
Daily Pre-start	Daily	Safety, environment, quality
Site Inspection	Weekly	Safety, environment
Environmental Inspection	Weekly	Environment
ER Inspection	Weekly	Environment

8.2 Monitoring Procedure

8.2.1 Noise and Vibration Monitoring

Noise and vibration monitoring will be undertaken using permanent installations at the nearest representative sensitive receivers around the demolition site. Results from these monitors shall be reviewed on a weekly basis to ensure ongoing compliance. Where complaints are received, additional monitoring may be conducted at the specific location of complaint.

Monitoring results shall be made available online for access by key project stakeholders. Proposed permanent monitor locations are detailed the Noise and Vibration Management Sub Plan and Noise and Vibration Impact Assessments. The number and location of monitoring points shall be reviewed after an initial period of 2 - 3 months. Where noise and vibration levels are negligible and, in consideration of the works still to be completed, those levels are not expected to increase for the remainder of the project, consideration shall be given to the removal of redundant monitoring points.

8.2.2 Vibration Screening Criteria

Heritage buildings and structures will be assessed as per the screening criteria in the Noise and Vibration Management Sub Plan and the Sydney Metro City & Southwest Construction Noise and Vibration Strategy.

British Standard 7385: Part 2 1993 suggests levels of vibration at which cosmetic, minor, and major damage may occur, and that vibration levels up to the cosmetic damage level are considered safe and have produced no observable damage for building types.

Heritage buildings should not be assumed to be more sensitive to vibration unless they are found to be structurally unsound. Therefore, the cosmetic damage screening level per receiver type is:

- 50 mm/sec for reinforced or framed structures; and
- 15 - 20 mm/sec for unreinforced or light framed structures.

If a heritage building or structure is found to be structurally unsound following condition inspection, a more conservative cosmetic damage criterion will be considered in accordance with the Sydney Metro City & Southwest Construction Noise and Vibration Strategy. Condition inspections will be prepared by Delta's sub-contractor and submitted to the Principal in accordance with the terms of the contract prior to the commencement of demolition.

Exceedance of the cosmetic damage level will not require demolition to cease, but alerts the Site Manager to proceed with caution at reduced force or load, or reduce the number of vibration-generating plant/equipment items operating simultaneously. An exceedance will also require the Project Manager to implement alternative techniques pending

further analysis of the vibration frequency content in order to determine any potential exceedance of the criteria presented in the NVMSP.

8.3 Site Audits

Delta carries out routine safety, environmental, and quality audits of all of its projects. Delta’s heritage management measures will be incorporated into these in accordance with Delta’s IMS Procedure AUD 005 Audit Environmental and as a component of this HMSP.

Where Delta performs compliance audits of its systems and procedures, the Principal will be invited to participate in the audit planning and oversee conduct of the audit. Delta will later provide a copy of the audit report to the Principal.

Where sub-contractors are employed to deliver aspects of the Project, Delta will require its audit and surveillance requirements are maintained by the sub-contractor, and provide evidence that the sub-contractor’s activities are being effectively overseen by Delta. If requested by the Principal, Delta will provide evidence of the effective implementation of management systems and procedures by its sub-contractors.

Delta’s management plans, systems, and processes will be subject to audit and surveillance by the Principal to gain assurance that Delta has established effective management systems and processes to meet the requirements of the Contract. The Principal may utilise its own auditors and surveillance officers to perform these activities, supported by subject matter experts where relevant.

The audit and surveillance activities may include risk-based compliance testing, desktop review of documentation, inquiry and observation of activities, or review of developing processes or activities.

Delta will be cooperative in assisting the Principal’s auditors and surveillance officers in undertaking their duties. This will include providing safe access to sites, systems and documentation, providing facilities to perform audits and surveillance, and the participation of Delta and Subcontractor representatives as required.

A timetable of site audits is provided in Table 6.

Table 6 Site Audit Timetable

Inspection	Frequency	Content
Internal HSEQ Audit	Monthly	Safety, environment (including heritage), quality
Internal Project Audit	Monthly	Project objectives Project specific management plans and procedures (including the HMSP)
Principal’s Audit	As determined throughout contract	Project management plans, systems, and processes

9 RECORDS AND REPORTING

9.1 Compliance Records

Delta will retain copies of all compliance records generated for heritage management and heritage monitoring. These records will include:

- 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 design or construction methods.

Delta will verbally notify the Sydney Trains Nominated Representative where Delta becomes aware of an unexpected find. Works in the vicinity of the unexpected find will cease immediately. Depending on the nature of the unexpected find, ongoing management will be carried out by Sydney Metro, or the NSW Police. Delta will retain records as required by these parties.

9.2 Reporting

9.2.1 Heritage Incident/Non-Compliance Report

Incident or non-compliance reports will be provided to the Principal's Representative within 48 hours of the observation using either SEF 010-A Accident-Incident Report or SEF 052 Non-conformance Report.

The Principal's Representative will review the report and provide advice to Delta if necessary on any requirements for an incident investigation.

9.2.2 Incident Register

Delta will maintain an incident register to manage the information associated with reporting of unexpected finds, heritage inspections, and non-compliances. The register will be maintained by the Environment and Sustainability Manager, and will assist Delta to report monthly to the Principal in accordance with the requirements of the Contract.

The Delta Health and Safety Manager will be responsible for updating the incident register following an incident or non-compliance.

The incident register will be submitted to Sydney Metro upon request.

9.2.3 Monthly Report

Delta will prepare and submit a monthly report which meets the requirements of the Contract. The Monthly Report will be submitted to the Principal's Representative for review.

10 Appendices

A. Salvage Recommendations

Sydney Metro—Chatswood to Sydenham—Salvage Recommendations



Site Name: 187 Miller Street, North Sydney

Date of Inspection: 03/02/2017



Inspection by: Steven Barry and Emma McGirr, GML Heritage




General Note on Condition: The site is generally in very poor condition with evidence of dry rot and termite infestation to most timber elements throughout. Rodent infestation has also deteriorated the condition of the building. The timber floors throughout are in very poor condition with sections missing/broken. The site also features some original timber joinery in varying condition. Apart from the timber elements listed below, no other timber elements were deemed suitable for salvage and reuse. The condition of elements recommended for salvage will need to be confirmed on site at the time of demolition.

Salvage Inventory

Reference	Item Name	Category	Justification	Condition	Photo
A1	Steel awning brackets	Category 2b	Consider reuse potential as part of interpreting the Victorian-era history of the site through heritage interpretation/public art.	Good condition—may need rust treatment if used in outdoor setting.	
A2	Representative example of pressed metal ceiling	Category 2b	Retain representative sample (approx. 2m x 2m) and consider replication of relief pattern as part of interpretation/public art.	Good condition—the condition will need to be confirmed when taken removed from the ceiling.	

GML Heritage

<p>A3</p>	<p>Victorian timber shopfront including front door, coffered ceiling infill to entry and timber door</p>	<p>Category 4</p>	<p>Local significance and could be made available to the community for reuse.</p>	<p>Good to moderate condition.</p>	
<p>A4</p>	<p>Slate entry threshold</p>	<p>Category 4</p>	<p>Local significance and could be made available to the community for reuse.</p>	<p>Good condition (well worn).</p>	

A5	Parapet urn	Category 4	Local significance and could be made available to the community for reuse.	Good condition—condition to be confirmed when accessible.	
A6	Pressed metal ceilings	Category 4	Local significance and could be made available to the community for reuse.	Good condition—condition will vary based on location.	
A7	Ceiling rose to Bedroom 1	Category 4	Local significance and could be made available to the community for reuse.	Good condition.	

GML Heritage

A8
Timber mantel piece and cast
iron chimney place to Bedroom
1

Category 4

Local significance and could be made available to the community for
reuse.

Good condition.



B. Unexpected finds

Sydney Metro Unexpected Heritage Finds Procedure

Supporting Document – Applicable to:

Quality Management System

Status:

Division:

Version:

Date of issue:

Effective date:

Review date:

Document owner:

Security classification:

Document History

Version	Date of approval	Doc. Control no.	Notes

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1. Purpose

This procedure has been developed in response to Critical State Significant Infrastructure (CSSI) Condition of Approval (CoA) E19 that requires Sydney Metro City & Southwest Program to provide a method for managing unexpected heritage items (both Aboriginal and non-Aboriginal) that are discovered during construction.. 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, TfNSW and its contractors. This procedure includes TfNSW's heritage notification obligations under the Heritage Act, NPW Act and the *Coroner's Act 2009 and the specific requirements of the conditions of approval(CoA) issued by NSW Department of Planning and Environment for CSSI 15-7400*.

Note that a Contractor may create their own Unexpected Finds Procedure or modify this document, however its use will be subject to compliance with the following:-

- CSSI CoA E17 (requires consultation with the Heritage Council of NSW (or its delegate)
- CSSI CoA E19
- Prior approval from the the nominated Excavation Director as required under CSSI CoA E18
- Prior approval from the Environmental Representative (CSSI Condition of Approval A24
- Prior approval from Sydney Metro.

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 prohibit 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 3, followed by the technical procedure in Sections 6 and 7. Associated guidance referred to in the procedure can be found in Appendices A-H.

2. Scope

Despite appropriate and adequate investigation, unexpected heritage items may still be discovered during maintenance and construction 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 construction activities for the Sydney Metro Program as approved under Section 115ZB of the Environmental Planning and Assessment Act 1979 for Critical State Significant Infrastructure, Application No. SSI 15-7400.

This procedure **applies to**:

- the discovery of any unexpected heritage item, relic or object, where the find is not anticipated in the Archaeological Assessment Design Report (AARD)

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 with the exception S139 of the NSW Heritage Act 1977

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 an 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

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.

under the Heritage Act; All new Construction Environment Management Plans (CEMPs) must make reference to and/or include this procedure (included as a heritage sub-plan, refer to CSSI CoA C6(g)).

Note that this procedure does not supersede the requirements of CSSI CoA CSSI CoA E10 and E26:

- E10 The Proponent must not destroy, modify or otherwise physically affect any Heritage item not identified in documents referred to in CoA A 1.
- E26 This approval does not allow the Proponent to harm, modify, or otherwise impact human remains uncovered during the construction and operation of the CSSI, except in accordance with the Exhumation Management Plan (CoA E27).

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:

Term	Meaning
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
CSSI	Critical State Significant Infrastructure
EP&A Act	NSW <i>Environmental Planning and Assessment Act 1979</i>
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

Term	Meaning
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 heritage 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 – Infrastructure and Services Division
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 subject to specific assessment by the Excavation Director

4. Accountabilities

The Principal Manager Sustainability Environment & Planning (Program) is accountable for this procedure including authorising the document, monitoring its effectiveness and performing a formal document review.

5. 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 A** illustrates the wide range of heritage discoveries found on transport infrastructure projects and provides a useful photographic guide. Subsequent confirmation of heritage discoveries must then be identified and assessed by Excavation Director as required under CSSI CoA E20An 'unexpected heritage item' means any unanticipated discovery of an actual or potential heritage item, for which Sydney Metro (refer to CSSI CoA E10 and E26) does not have approval to disturb² and/or have an existing management process in place.

These discoveries are categorised as either:

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).

- (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 addressed in the Sydney Metro Exhumation Management Plan (refer to CSSI CoA E26 and E27).

5.1. Aboriginal objects

The NPW Act protects Aboriginal objects which are defined as:

“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 OEH⁴. Also, when a person becomes aware of an Aboriginal object they must notify the Director-General of OEH about its location⁵. Assistance on how to do this is provided in Section 7 (Step 5).

CSSI CoA E23, E24 and E25 for management of Aboriginal Heritage Applies to the Sydney Metro Chatswood to Sydenham Project (CSSI 15-7400)

5.2. Historic heritage items

Historic (non-Aboriginal) heritage items may include:

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

³ Section 5(1) NPW Act.

⁴ Refer to CSSI CoA E23 & E25.

⁵ This is required under section 89(A) of the NPW Act and applies to all TfNSW projects.

5.2.1. 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”⁶.

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 Council⁷. Also, when a person discovers a relic they must notify the NSW Heritage Council of its location⁸. Advice on how to do this is provided in Section 7 (Step 5). Check

Construction in the vicinity of the discovery must not recommence until the requirements of the ARMP have been implemented, in consultation with the Excavation Director. The Sydney Metro must notify the Secretary of the Department of Environment & Planning in writing of the outcome of consultation with the Heritage Council of NSW. (CSSI CoA E20)

5.2.2. 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.

As a general rule, an archaeological relic requires discovery or examination through the act of excavation. An archaeological excavation permit under section 140 of the Heritage Act is

⁶ Section 4(1) Heritage Act.

⁷ Refer to CSSI CoA E20,

⁸ This is required under section 146 of the Heritage Act and applies to all TfNSW projects however also refer to foot note 8.

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).

Despite this difference, it should be remembered that relics can often be associated with 'other heritage items', such as archaeological deposits within cisterns and underfloor deposits beneath buildings.

5.3. Human skeletal remains

Refer to Sydney Metro Project Exhumation Management Plan

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 old⁹ 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 E**.

6. 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 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.

⁹ 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.

Relevant Requirement	Objectives and offences
<p><i>Heritage Act 1977</i> (Heritage Act)</p>	<p>The Heritage Act provides for the care, protection and management of heritage items in NSW.</p> <p>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.</p> <p>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></p> <p>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.</p>

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>

7. Unexpected heritage finds protocol

7.1. 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.

7.2. 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 discover a heritage item and you are unsure whether an approval is in place or not, **STOP** works and follow this procedure.

**Sydney Metro Unexpected Heritage Finds
Procedure**

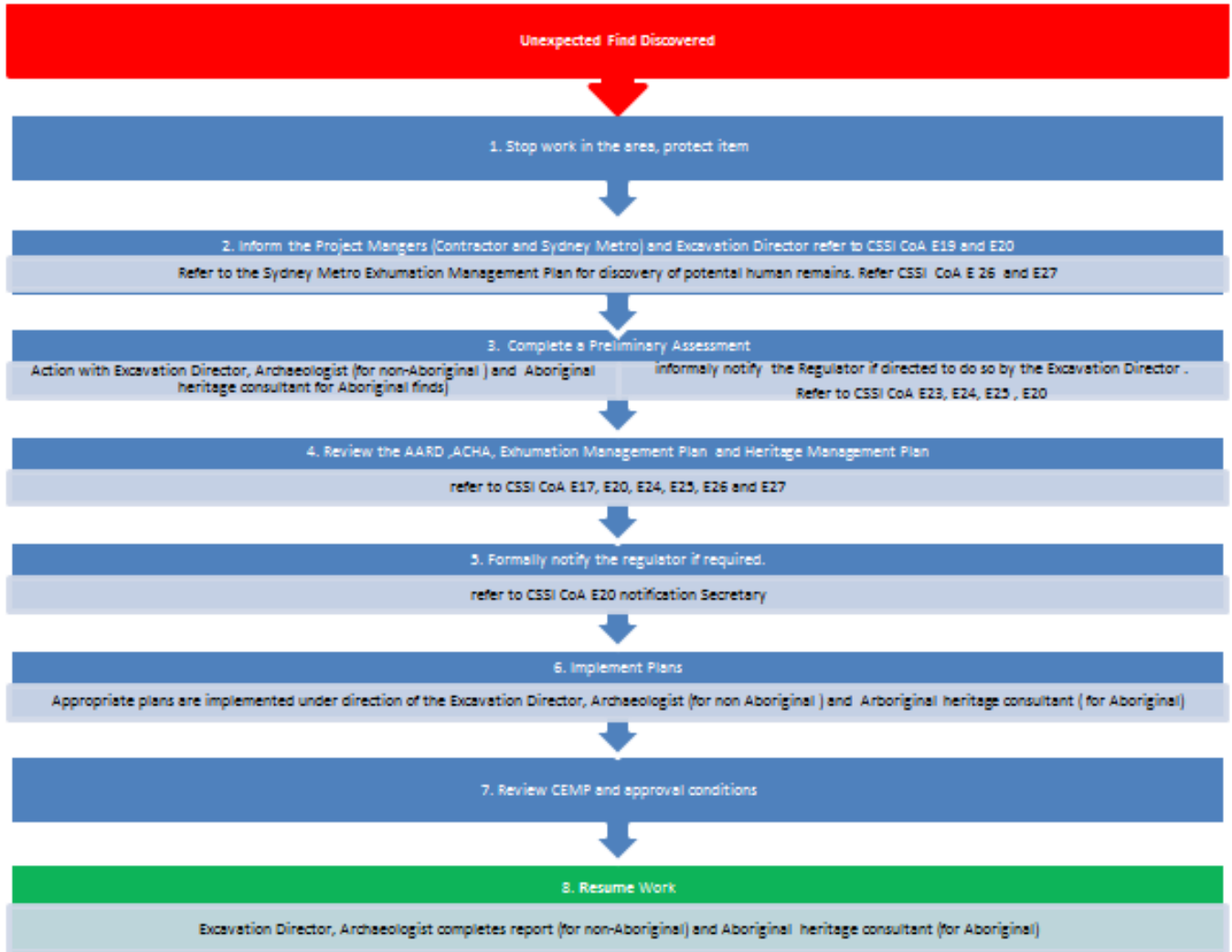


Table 2 Specific tasks to be implemented following the discovery of an unexpected heritage item

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 A (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.	Excavation Director	Appendix B (Unexpected Heritage Item Recording Form) Appendix C (Photographing Unexpected Heritage items)
1.4	Is the item likely to be bone? If yes , follow the steps in Appendix D – '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. If no , proceed to next step.	Excavation Director	Appendix D (Uncovering Bones)

Step	Task	Responsibility	Guidance and tools
1.5	<p>Inform the Excavation Director of the item and provide as much information as possible, including photos and completed form (Appendix B).</p> <p>Where the project has an Environmental Management Representative (EMR), the EMR should be involved in the tasks/process as appropriate.</p>	Contractors Project Manager	
1.6	<p>Can the works avoid further disturbance to the item? Project Manager to confirm with TfNSW Environment and Planning Manager.</p> <p>Complete the remaining tasks in Step 1.</p>	Contractors Project Manager	
1.7	<p>Excavation Director to advise the Project Manager whether TfNSW has approval to impact on the 'item'.</p> <p>Does TfNSW have an approval or permit to impact on the item?</p> <p>If yes, work may recommence in accordance with that approval or permit. There is no further requirement to follow this procedure.</p> <p>If no, continue to next step.</p>	Contractors Project Manager	
1.8	<p>Has the 'find' been damaged or harmed?</p> <p>If yes, record the incident in the Incident Management System Implement any additional reporting requirements related to the planning approval and CEMP, where relevant. Contact Sydney Metro Manager, Environment Safety, Environment and Business Systems</p>	Contractors Project Manager, Excavation Director	
2	Contact and engage an archaeologist and/or an Aboriginal heritage consultant		

Step	Task	Responsibility	Guidance and tools
2.1	<p>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.</p> <p>Where there is no project archaeologist engaged for the works engage a suitably qualified consultant to assess the find:</p> <p>if the find is a non-Aboriginal deposit, engage a suitably qualified and experienced archaeological consultant</p> <p>if the find is likely to be an Aboriginal object, engage an Aboriginal heritage consultant to assess the find.</p>	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.	TfNSW Project Manager	Appendix C (Photographing Unexpected Heritage items)
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 (<i>e.g. the item is not a 'relic', a 'heritage item' or an 'Aboriginal object'</i>). Any such advice should be provided in writing (<i>e.g. via email or letter with the consultant's name and company details clearly identifiable</i>) to the TfNSW Project Manager.	Archaeologist/ Aboriginal heritage consultant/ Contractors Project Manager, Excavation Director	Proceed to Step 8

Step	Task	Responsibility	Guidance and tools
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	<p>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 '<i>relic</i>' or a '<i>heritage item</i>' or an '<i>aboriginal item</i>'. 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 TfNSW Project Manager.</p> <p>Note that :</p> <ul style="list-style-type: none"> 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 A (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.	Contractors Project Manager, Excavation Director	
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 Principal Manager Sustainability Environment and Planning (Program). Any verbal conversations with regulators must be noted on the project file for future reference.	Contractors Project Manager, Excavation Director	

Step	Task	Responsibility	Guidance and tools
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? If no , proceed directly to Step 6 If yes , proceed to next step.	Contractors Project 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.	Contractors Project Manager, Excavation Director	Appendix F (Template Notification Letter)
5.3	Forward the signed notification letter to OEH. 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 B) 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.	Contractors Project Manager, Excavation Director	
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 Trains Heritage Team (if on land managed by Sydney Trains) and the Sydney Metro Project Manager.	Contractors Project Manager, Excavation Director	
6	Implement archaeological or heritage management plan		

Step	Task	Responsibility	Guidance and tools
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 Environment and Planning 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.	Contractors Project Manager, Excavation Director	
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	

Step	Task	Responsibility	Guidance and tools
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	
8	Resume work		
8.1	Seek written clearance to resume project work from the Environment and Planning Manager and the 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	
8.4	If additional unexpected items are discovered this procedure must begin again from Step 1.	All	

8. Responsibilities

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 advises that work can recommence.
Contractor or Environment Manager	<p>Manage the process of identifying, protecting and mitigating impacts on the 'find'.</p> <p>Liaise with Sydney Metro Project Manager and Environment and Planning Manager and assist the archaeologist/Aboriginal heritage consultant with mitigation and regulatory requirements.</p> <p>Complete Incident Report and review CEMP for any changes required. Propose amendments to the CEMP if any changes are required.</p>
Contractor's or Project Heritage Advisor or Consultant	Provide expert advice to the Sydney Metro Environment and Planning Manager on 'find' identification, significance, mitigation, legislative procedures and regulatory requirements.
Environmental Management Representative	<p>Independent environmental advisor engaged by Sydney Metro</p> <p>Review and provides advice on heritage management plan and changes to the CEMP. Ensures compliance with relevant approvals (new and existing).</p>
Heritage Division of OEH	<p>Regulate the care, protection and management of relics (non-Aboriginal heritage).</p> <p>Issue excavation permits.</p>
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 and Planning Manager	Notify the TfNSW 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 when all applicable requirements have been satisfied.

9. Seeking advice

Advice on this procedure should be sought from the Sydney Metro Environment and Planning 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.

10. Related documents and references

Related Documents

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*.

11. List of appendices

The following appendices are included to support this procedure:

- Appendix A: Examples of finds encountered during construction works
- Appendix B: Unexpected Heritage Item Recording Form
- Appendix C: Photographing Unexpected Heritage Items
- Appendix D: Uncovering Bones
- Appendix E: Archaeological Advice Checklist
- Appendix F: Template Notification Letter

Appendix A - 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 B- 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 (What type of item is it likely to be? Tick the relevant boxes).			
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>(eg metal rail tracks running parallel to the rail corridor. Good condition. Tracks set in concrete, approximately 10 cm below the current ground surface).</i>			
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>			
Action taken (Tick either A or B)			
A. Unexpected item would not be further impacts on by the works	<input type="checkbox"/>	Describe how works would avoid impact on the item. <i>(eg the rail tracks would be left in situ and recovered with paving).</i>	

<p>B. Unexpected item would be further impacted by the works</p>	<input type="checkbox"/>	<p>Describe how works would impact on the item. (eg 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 C- 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.

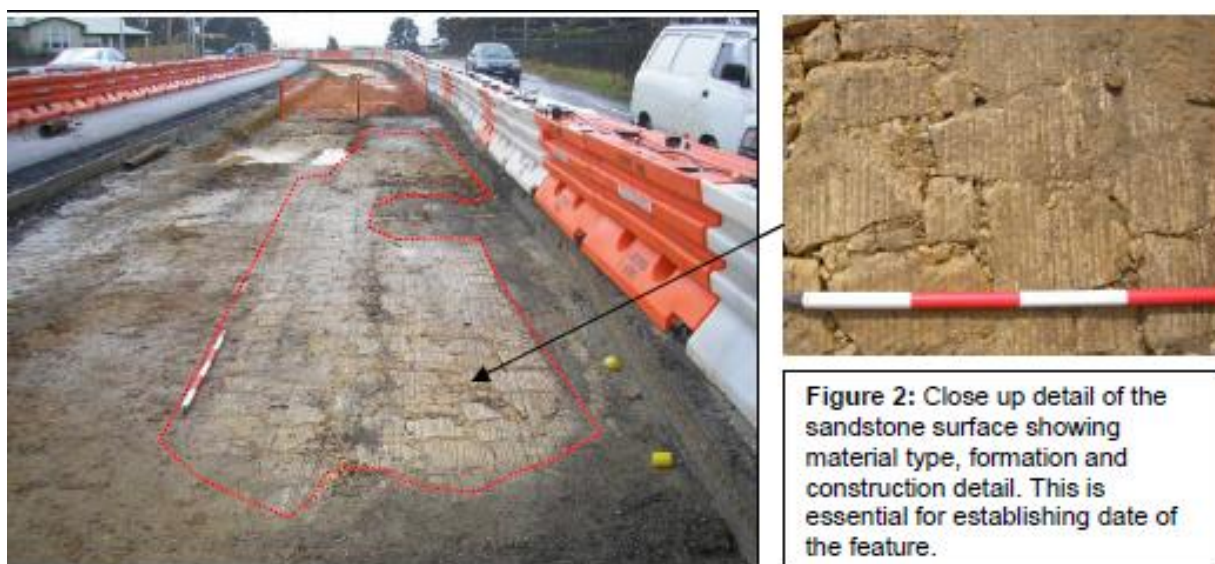


Figure 1: Telford road uncovered on the Great Western Highway (Leura) in 2008 (RMS, 2015).

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 F 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 D - 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.

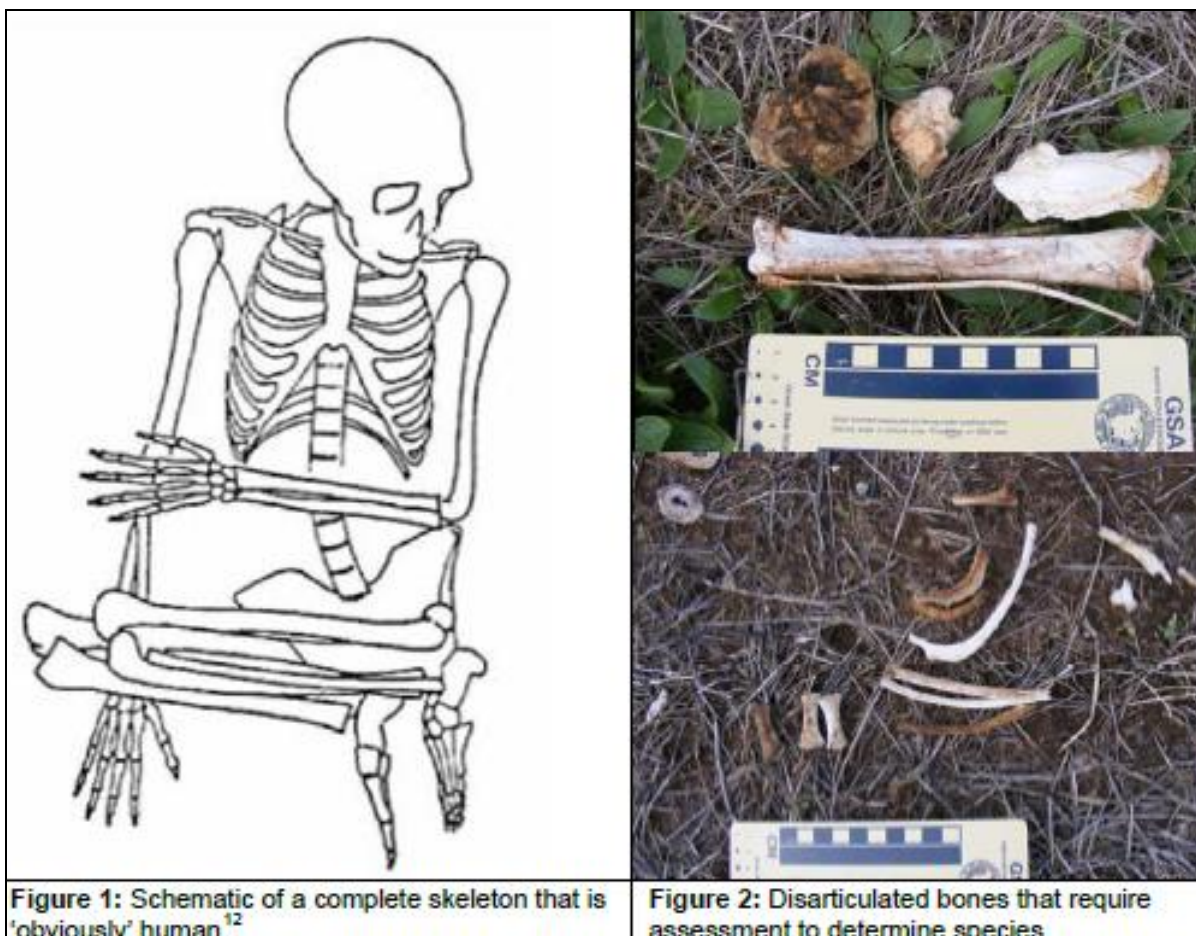
1. First uncovering bones

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 1¹⁰. 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.

¹⁰ 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 C. 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) appropriate. This must be followed up later by a formal letter notification to the relevant regulator (as per Appendix G) 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.

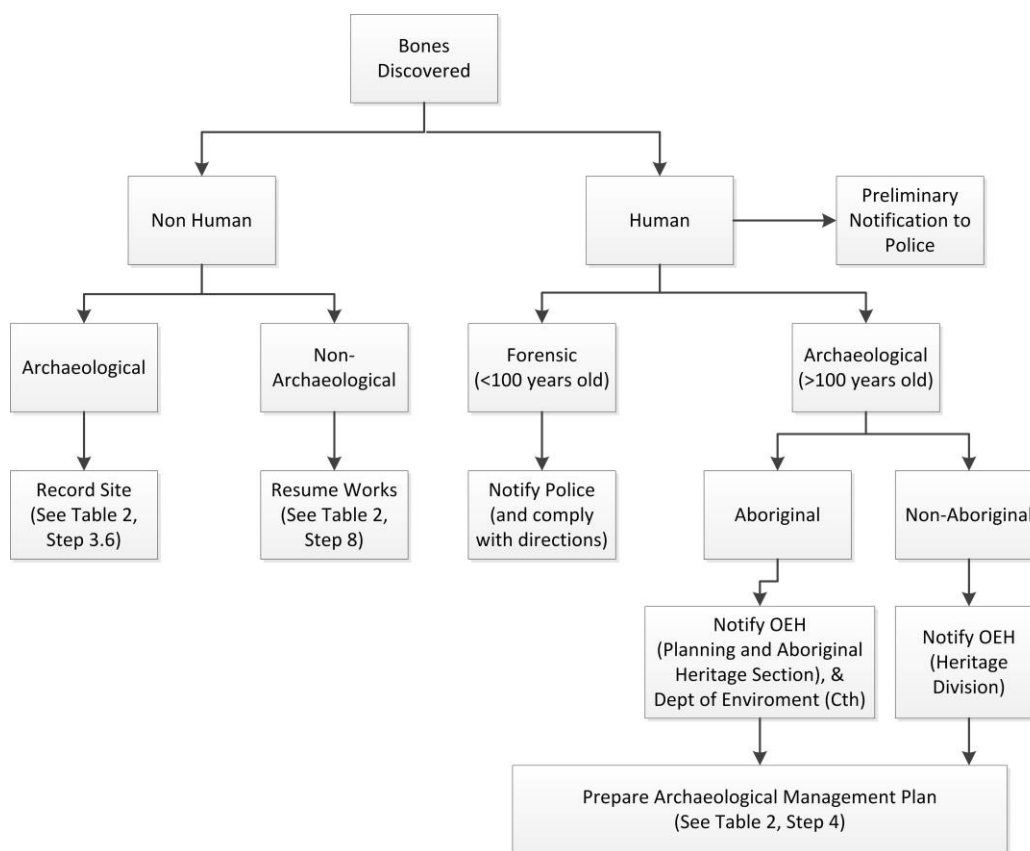


Figure 3 Overview of steps to be undertaken on the discovery of bones

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, TfNSW is 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)¹¹.

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.

¹¹ This requirement is in addition to heritage approvals under the *Heritage Act 1977*.

Appendix E - 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 F- 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 Transport for NSW –Sydney Metro activities.

I write to inform you of an unexpected [select: relic, heritage item or Aboriginal object] found during TfNSW 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].

C. Stakeholder responses

Matthew Stephenson

From: Brad Stafford <Brad.Stafford@northsydney.nsw.gov.au>
Sent: Friday, 24 March 2017 2:57 PM
To: Matthew Stephenson
Cc: Ben.schum@deltagroup.com.au; Marcelo Occhiuzzi; Grennan, Paul (Paul.Grennan@transport.nsw.gov.au)
Subject: RE: Delta Group the C&SW project - Heritage & NVMP for comment

Matthew

Thank you for the opportunity to comment on the above draft documents. Please find below Council's comments:

Heritage Management Plan

The Heritage Management Sub Plan provided appears to be generally acceptable. However, Council notes that reference is made to other documents being prepared, including the Salvage Strategy for 187 Miller Street. Since the HMSP was forwarded to Council, TfNSW has made a draft Salvage Strategy available to Council. The Salvage Strategy appears to be an adequate response to the relevant consent conditions.

Council also notes / requests the following:

- The HMSP does not include any information about the demolition and reconstruction of the Bus Shelters. This information should be provided to Council in accordance with Condition E12 of the Approval.
- It is noted that Council recently resolved to explore the relocation of the building at 187 Miller Street. TfNSW is aware of this resolution and it is understood that they are preparing a formal response for Council on that matter.
- Council requests that it be given the opportunity to acquire any elements of 187 Miller Street salvaged as per the final Salvage Strategy.

Noise and Vibration Management Plan

Council considers the Plan to be generally acceptable, and notes the following:

- The NVMP advises that criteria as per the EPA interim Construction Noise Guidelines and AS2107 – *'Acoustics – Recommended design sound levels and reverberation times for building interiors'* are to be complied with.
- The report states that at no time can noise exceed 85dB(A) x 8 hours for an employee working at a location near the CSSI. Council understands that this is the threshold for noise induced hearing loss, and would be concerned if office workers were exposed to a noise level close to this, as it would make carrying out a day's work very difficult, in addition to potentially being physically harmful.
- The report advises that noise and vibration monitoring is to be carried out with data available in real time. The monitors are to be equipped such that alerts will be sent out/triggered if pre-determined criteria are exceeded. The plan advises of the course of action to be followed should such an alert be triggered.
- The plan advises of consultation and communication throughout with the community.
- There is a process outlined for dealing with complaints.
- The noise sensitive receivers most likely to be impacted have been identified and consultation with them is planned.

- Alternatives to rock hammering and noise and vibration mitigation measures have been explored.

Thank you once again for allowing Council to comment on these draft documents. Council will continue to participate in planning discussions and will monitor activities when construction works begin.

If you would like to discuss any of the above, please call me on the number below.

Regards
Brad

Brad Stafford
Executive Planner Metro Project

P +61 2 9936 8358

E Brad.Stafford@northsydney.nsw.gov.au



www.northsydney.nsw.gov.au



From: Matthew Stephenson [mailto:matthew.stephenson@deltagroup.com.au]
Sent: Friday, 10 March 2017 3:53 PM
To: Brad Stafford <Brad.Stafford@northsydney.nsw.gov.au>
Subject: Delta Group the C&SW project - Heritage & NVMP for comment

Dear Brad,

The Delta Group have been engaged by Sydney Metro Delivery Office to undertake demolition at a number of locations as part of the approved Sydney Metro Chatswood to Sydenham project.

Please find [link](#) to Delta's Heritage Management Plan and Construction Noise & Vibration Management Plan for the Victoria Cross, 189 Berry St, 2060 worksite in Nth Sydney Council LGA. These documents have been developed for the City and Southwest (S&SW) project as per the planning approval requirement condition CoA 3 of project approval SSI 15_7400. This condition also requires the project to develop these Management Plans in consultation with the relevant Councils. A copy of the planning approval conditions for the project can be found here:

<https://majorprojects.affinitylive.com/public/905651871bf56767f032de5bedf5f13b/Approval%20instrument%20Sydney%20Metro%20City%20and%20Southwest%20C2S.pdf>

As such, Delta Group the C&SW project would like to formally submit the attached documents for comment.

The earliest Council response would be very much appreciated but S&SW project team need comments back by no later than 24/03/2017.

Thank you for your help and understanding and please do not hesitate in contacting me if required to discuss.

Ben Shum

Project Director
Ben.schum@deltagroup.com.au



Matthew Stephenson

From: Bryony Cooper <BCooper@cityofsydney.nsw.gov.au>
Sent: Tuesday, 4 April 2017 2:11 PM
To: Ben.schum@deltagroup.com.au
Cc: Paul.Grennan@transport.nsw.gov.au; Matthew Stephenson
Subject: RE: Delta Group the C&SW project - Heritage & NVMP for comment

Ben,

Thank you for the opportunity to review these plans.

The City has reviewed the plans and is happy with the detail and adequacy and has no comments.

Apologies for the delay in responding.

Bryony

Bryony Cooper
Executive Manager City Access and Transport
City Access Unit



Telephone: +612 9246 7703
Mobile: +61 400 551 199
cityofsydney.nsw.gov.au

From: Matthew Stephenson [mailto:matthew.stephenson@deltagroup.com.au]
Sent: Friday, 10 March 2017 3:55 PM
To: Bryony Cooper <BCooper@cityofsydney.nsw.gov.au>
Subject: Delta Group the C&SW project - Heritage & NVMP for comment

Dear Bryony,

The Delta Group have been engaged by Sydney Metro Delivery Office to undertake demolition at a number of locations as part of the approved Sydney Metro Chatswood to Sydenham project.

Please find [link](#) to Delta's Heritage Management Plan and Construction Noise & Vibration Management Plan for the Victoria Cross, 189 Berry St, 2060 worksite in Nth Sydney Council LGA. These documents have been developed for the City and Southwest (S&SW) project as per the planning approval requirement condition CoA 3 of project approval SSI 15_7400. This condition also requires the project to develop these Management Plans in consultation with the relevant Councils. A copy of the planning approval conditions for the project can be found here:

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The earliest Council response would be very much appreciated but S&SW project team need comments back by no later than 24/03/2017.

Thank you for your help and understanding and please do not hesitate in contacting me if required to discuss.

Ben Shum

Project Director

Ben.schum@deltagroup.com.au



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Matthew Stephenson

From: Sung, David <David.Sung@Willoughby.nsw.gov.au>
Sent: Thursday, 30 March 2017 11:02 AM
To: Matthew Stephenson
Cc: Arnott, Ian
Subject: RE: Delta Group the C&SW project - Heritage & NVMP for comment

Thank you Matt.

Agree with the passive surveillance provided by mesh fencing as against the use of hoardings.

Will it be possible to also include security lighting? I think I did ask if the site will have security personnel patrolling the site when we discussed this issue over the phone. If not, then it would be appropriate to install a few security lights as a further deterrent. Happy to discuss what is possible and appropriate.

Cheers
David

From: Matthew Stephenson [mailto:matthew.stephenson@deltagroup.com.au]
Sent: Thursday, 30 March 2017 9:41 AM
To: Sung, David
Subject: RE: Delta Group the C&SW project - Heritage & NVMP for comment

Dear Mr Sung,

Following our telephone conversation on Monday, with regards to the Chatswood Dive site, which Mowbray house sits within, we have agreed with Sydney Metro that to increase safety and security around Mowbray house we will be installing a mesh fencing, opposed to a wooden hoarding, the mesh fencing will provide full visibility to Mowbray House whilst still forming a secure enclosure. The fence will also have 3 rows of barbed steel wire above to ensure no trespassers gain access.

I hope this satisfies your concerns over site safety, if you could let me know by email that you have no further comments on the Heritage plan I will send over a comments revision sheet for your records.

Many thanks

Matt

Matthew Stephenson MSc
Environment & Sustainability Manager



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Alexandria, NSW 2015
Tel. +61 2 8339 0588
Mob. +61 0418 284226
Email. matthew.stephenson@deltagroup.com.au

www.deltagroup.com.au



From: Sung, David [mailto:David.Sung@Willoughby.nsw.gov.au]
Sent: Monday, 13 March 2017 9:17 AM
To: Matthew Stephenson <matthew.stephenson@deltagroup.com.au>
Subject: RE: Delta Group the C&SW project - Heritage & NVMP for comment

Thanks Matthew.

Regards
David

From: Matthew Stephenson [mailto:matthew.stephenson@deltagroup.com.au]
Sent: Monday, 13 March 2017 9:17 AM
To: Sung, David
Subject: RE: Delta Group the C&SW project - Heritage & NVMP for comment

Hi David,

Apologies, I can confirm that the Chatswood project, which the Mowbray House sits within, will have all the relevant sub plans drafted shortly, I'll send them over as soon as they are ready for comment.

Thanks

Matthew Stephenson MSc
Environment & Sustainability Manager



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Alexandria, NSW 2015
Tel. +61 2 8339 0588
Mob. +61 0418 284226
Email. matthew.stephenson@deltagroup.com.au

www.deltagroup.com.au



From: Sung, David [mailto:David.Sung@Willoughby.nsw.gov.au]
Sent: Monday, 13 March 2017 9:03 AM
To: Matthew Stephenson <matthew.stephenson@deltagroup.com.au>
Subject: RE: Delta Group the C&SW project - Heritage & NVMP for comment

Hi Matthew,

Thank for the information. There doesn't seem to be any mention of Mowbray House, which is the focus of Willoughby City Council's concerns in relation to the demolition of the former Ausgrid site. I did a quick scan of the document but only found reference to Victoria Cross. Could you confirm that there is another document that would be more site specific for the Ausgrid site?

Thanks

David

David Sung - Design Services Manager

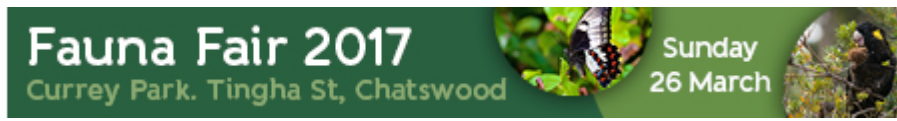
WILLOUGHBY CITY COUNCIL

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E David.Sung@Willoughby.nsw.gov.au

willoughby.nsw.gov.au | willoughbyleisure.com.au | theconcourse.com.au



From: Matthew Stephenson [<mailto:matthew.stephenson@deltagroup.com.au>]

Sent: Friday, 10 March 2017 3:54 PM

To: Sung, David

Subject: FW: Delta Group the C&SW project - Heritage & NVMP for comment

Dear David,

The Delta Group have been engaged by Sydney Metro Delivery Office to undertake demolition at a number of locations as part of the approved Sydney Metro Chatswood to Sydenham project.

Please find [link](#) to Delta's Heritage Management Plan and Construction Noise & Vibration Management Plan for the Victoria Cross, 189 Berry St, 2060 worksite in Nth Sydney Council LGA. These documents have been developed for the City and Southwest (S&SW) project as per the planning approval requirement condition CoA 3 of project approval SSI 15_7400. This condition also requires the project to develop these Management Plans in consultation with the relevant Councils. A copy of the planning approval conditions for the project can be found here:

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As such, Delta Group the C&SW project would like to formally submit the attached documents for comment.

The earliest Council response would be very much appreciated but S&SW project team need comments back by no later than 24/03/2017.

Thank you for your help and understanding and please do not hesitate in contacting me if required to discuss.

Ben Shum

Project Director

Ben.schum@deltagroup.com.au



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www.deltagroup.com.au

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Matthew Stephenson

From: Nina Pollock <Nina.Pollock@environment.nsw.gov.au>
Sent: Tuesday, 28 March 2017 4:25 PM
To: Matthew Stephenson
Cc: Tucker, Craig; Siobhan Lavelle
Subject: CSSI 7400 - Sydney Metro City and Southwest Chatswood to Sydenham - Comments on Heritage Management Sub Plan, Construction Environmental Management Plan.

Dear Mr Stephenson

Thank you for meeting with the Heritage Division today to discuss the management documents required to comply with C2 to C4 of the approval conditions for this project.

We understand that the conditions of approval require preparation of a Construction Environmental Management Plan (CEMP) detailing how the performance outcomes, commitment and mitigation measures of the Preferred Infrastructure Report will be implemented and achieved during construction. Regarding the management of heritage impacts, condition C4 requires the development and implementation of a Heritage Sub-Plan in consultation with the NSW Heritage Council (or its delegate).

The CEMP provided to us today confirms that Delta's engagement is limited to the demolition of all above ground and in ground structures, excluding Martin Place Railway Station, and does not involve excavation. Other components of the overall project will be covered in separate CEMPs and Sub-Plans.

Generally the Sub-Plan is sufficient on the assumption that all works will be undertaken in accordance with the Archival Recordings, Interpretation Plans, Salvage Strategies, Archaeological Assessment Research Design Reports and Exhumation Plans required in the consent conditions, that are the responsibility of the proponent. However we request that the response to conditions table on page 7 is revised to directly reference the relevant reports to demonstrate the contractor is aware of the agreed strategies. It is also requested that the Sub-Plan responds to the heritage Mitigation Measures NAH1 – NAH13, as it is a requirement to state how these mitigation measures would be implemented. Where mitigation measures are not relevant to the contract, this should be clarified.

We look forward to reviewing the final Archival Recordings, Interpretation Plans, Salvage Strategies, Archaeological Assessment Research Design Reports and Exhumation Plans once they are made available.

Kind regards

Nina Pollock
Senior Heritage Assessment Officer
Heritage Division
Locked Bag 5020 PARRAMATTA NSW 2124
Level 6, 10 Valentine Ave, PARRAMATTA NSW 2150

T: (02) 9873 8520
E: nina.pollock@environment.nsw.gov.au
W: www.heritage.nsw.gov.au



I acknowledge and respect the traditional custodians and ancestors of the lands I work across

Matthew Stephenson

From: Ryan Hawken <ryan.hawken@innerwest.nsw.gov.au>
Sent: Monday, 3 April 2017 4:18 PM
To: Matthew Stephenson
Cc: Craig Tucker (Craig.Tucker@transport.nsw.gov.au)
Subject: RE: Delta Group the C&SW project - Heritage & NVMP for comment

Hi Matthew/Craig

Thanks for the opportunity to comment on the below.

Based on our review Council does not have any comments.

Regards

Ryan Hawken | Coordinator Asset Planning
Inner West Council
P: +61 2 9335 2246 | **E:** ryan.hawken@innerwest.nsw.gov.au

Ashfield Service Centre: 260 Liverpool Road, Ashfield NSW 2131
Leichhardt Service Centre: 7-15 Wetherill Street, Leichhardt NSW 2040
Petersham Service Centre: 2-14 Fisher Street, Petersham NSW 2049



Council acknowledges the Traditional Custodians of this land, the Gadigal-Wangal people of the Eora Nation.

From: Matthew Stephenson [mailto:matthew.stephenson@deltagroup.com.au]
Sent: Friday, 31 March 2017 9:18 AM
To: Ryan Hawken
Cc: Craig Tucker (Craig.Tucker@transport.nsw.gov.au)
Subject: RE: Delta Group the C&SW project - Heritage & NVMP for comment

Ryan,

I am going to be on leave for a couple of days, please forward any correspondence you have re the heritage and NVMP to Craig Tucker at Sydney Metro CC in.

Kind Regards,

Matthew Stephenson MSc
Environment & Sustainability Manager



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Alexandria, NSW 2015
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Email. matthew.stephenson@deltagroup.com.au

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From: Matthew Stephenson
Sent: Monday, 27 March 2017 10:35 AM
To: 'ryan.hawken@innerwest.nsw.gov.au' <ryan.hawken@innerwest.nsw.gov.au>
Subject: RE: Delta Group the C&SW project - Heritage & NVMP for comment

Dear Mr Hawken,

The Delta Group have been engaged by Sydney Metro Delivery Office to undertake demolition at a number of locations as part of the approved Sydney Metro Chatswood to Sydenham project.

Please find [link](#) to Delta’s Heritage Management Plan and Construction Noise & Vibration Management Plan for the Victoria Cross, 189 Berry St, 2060 worksite in Nth Sydney Council LGA. These documents have been developed for the City and Southwest (S&SW) project as per the planning approval requirement condition CoA 3 of project approval SSI 15_7400. This condition also requires the project to develop these Management Plans in consultation with the relevant Councils. A copy of the planning approval conditions for the project can be found here:

<https://majorprojects.affinitylive.com/public/905651871bf56767f032de5bedf5f13b/Approval%20instrument%20Sydney%20Metro%20City%20and%20Southwest%20C2S.pdf>

As such, Delta Group the C&SW project would like to formally submit the attached documents for comment.

The earliest Council response would be very much appreciate.

Thank you for your help and understanding and please do not hesitate in contacting me if required to discuss or you have any issues with eth links.

Regards,

Matt

Matthew Stephenson MSc
Environment & Sustainability Manager



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