

CONSTRUCTION HERITAGE MANAGEMENT PLAN

Moorebank Precinct East Stage 1, Package 2

11 JULY 2019

SYDNEY INTERMODAL TERMINAL ALLIANCE

Moorebank Precinct East, Stage 1, Package 2

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REVISIONS

Revision	Date	Description	Prepared by	Approved by
0	04/05/16	Draft issue to SIMTA for comment	██████	██████
1	07/07/16	Addressed comments from SIMTA	██████	██████
2	10/01/17	Update CoC for consultation	████	████
3	27/01/17	Addressed comments from SIMTA	████	████
4	20/02/17	Update based on stakeholder consultation for submission to DP&E	██████	████
5	16/3/17	Updated to reflect additional comments from Heritage Council of NSW	██████	████
6	31/3/17	Updated to reflect DP&E comments	████	██████
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8	07/11/2017	Revision to construction boundary and inclusion of additional management measure to ensure protection of Building 13 associated with IMEX RfMA 003	██████	████
9	10/01/2018	Revisions associated with IMEX RfMA 005	██████	████
10	04/05/2018	Amended conditions as per the Land and Environment Court Ruling (March 2018)	██████	████
11	16/08/2018	Revisions associated with the internal environmental and sustainability audit	██████	████
12	11/01/2019	Minor updates associated with 'non-conformance,' 'non-compliance' and 'corrective and preventative actions'	████	██████
13	11/07/2019	Revisions associated with RfMA 011	████████ ██████	██████

ACRONYMS AND DEFINITIONS

Terms	Explanation
AHD	Australian Heritage Database
AHIP	Aboriginal Heritage Impact Permit
AHMS	Archaeological Heritage Management Service
Archaeological Potential	Potential of a site to contain archaeological remains. This potential is assessed by identifying former land uses and associated features through historical research, and evaluating whether subsequent actions (either natural or human) may have impacted on evidence for these former land uses.
CBD	Central Business District
CCOS	Council of City of Sydney
CEMP	Construction Environmental Management Plan
CHL	Commonwealth Heritage List
CHMP	Construction Heritage Management Plan
CoC	Conditions of Consent
Contractor	Principal Contractor
DNSDC	Defence National Storage and Distribution Centre
DoEE	Commonwealth Department of the Environment and Energy
DP&E	Department of Planning and Environment
DPI	NSW Department of Primary Industries
EDO	Environmental Defenders Office
EEC	Endangered Ecological Community
EIS	Environmental Impact Statement
EPA	NSW Environment Protection Authority
EPBC Act	Commonwealth Environment Protection and Biodiversity Conservation Act 1999
EPBC Approval	Approval (No. 2011/6229) granted under the EPBC Act on March 2014 by the Commonwealth Department of Environment for the development of the SIMTA Moorebank Intermodal Terminal Facility at Moorebank.
EPL	Environment Protection Licence
ER	Environmental Representative
ERM	Environmental Resources Management Australia Pty Ltd
FM Act	NSW Fisheries Management Act 1994
ha	hectare
HIA	Heritage Impact Assessment
HIS	Heritage Interpretation Strategy
IMEX	Import Export Terminal. Includes the following key components: <ul style="list-style-type: none"> Truck processing, holding and loading areas - entrance and exit from Moorebank Avenue

Terms	Explanation
	<ul style="list-style-type: none"> Rail loading and container storage areas – installation of four rail sidings with adjacent container storage area serviced by manual handling equipment initially and overhead gantry cranes progressively Administration facility and associated car parking- light vehicle access from Moorebank Avenue.
IMT facility	<p>MPE Stage 1 Site including the construction of the following key components together comprising the intermodal terminal (IMT):</p> <ul style="list-style-type: none"> Truck processing and loading areas. Rail loading and container storage areas. Administration facility and associated car parking Rail Link.
km	kilometres
LEP	Local Environment Plan
Local significance	An item is important in the course or pattern of the local area’s cultural or natural history.
L&EC	Land and Environment Court
Minister, the	NSW Minister for Planning
NHL	National Heritage List
NW Act	NSW Noxious Weeds Act 1993
NVIA	Noise and Vibration Impact Assessment
OEH	Office of Environment and Heritage
PAC	Planning Assessment Commission
MPE Stage 1, Package 1	The construction of the Rail Link connecting the Southern Sydney Freight Line to the IMEX, traversing across the Boot land, RailCorp Land, Moorebank Avenue, the MPW Golf Course, Georges River, and Glenfield Waste Facility
MPE Stage 1, Package 2	<p>Construction of the IMEX Terminal (Figure 1) including the following key components:</p> <ol style="list-style-type: none"> Truck processing, holding and loading areas - entrance and exit from Moorebank Avenue Rail loading and container storage areas – installation of four rail sidings with adjacent container storage area serviced by manual handling equipment initially and overhead gantry cranes progressively Administration facility and associated car parking- light vehicle access from Moorebank Avenue
MPE Stage 1 Project	The whole of the land to which the MPE Stage 1 Project approval SSD 6766 relates including both MPE Stage 1 Package 1, and MPE Stage 1 Package 2.
Non-compliance	An occurrence, set of circumstances, or development that results in a non-compliance or is non-compliant with Development Consent SSD 6766 Conditions of Consent or EPBC Act Approval (EPBC 2011/6229) Conditions of Approval but is not an incident
Non-conformance	Non-conformances are observations or actions that are not in strict accordance with the CEMP and the aspect specific sub-plan.
PAD	Potential Archaeological Deposit

Terms	Explanation
Research Potential	An item has potential to yield information that will contribute to an understanding of the NSWs (or the local area's) cultural or natural history. It is possible for an area to be of high archaeological potential but low research potential.
SIMTA	Sydney Intermodal Terminal Alliance
SSD	State Significant Development
SSFL	Southern Sydney Freight Line
Stage 1 site	The subject of this CHMP, includes all areas to be disturbed by Stage 1 Package 2 (including the Operational area and Indicative Construction area). This area does <u>not</u> include the Rail Corridor.
The Burra Charter	The Australia ICOMOS Charter for Places of Cultural Significance (Adopted 31 October 2013)
the Project	The Project is the MPE Stage 1, Package 2 Project i.e. the IMEX Terminal construction site as depicted in Figure 1.

COMPLIANCE MATRICES

Table 1 Ministers Conditions of Consent (CoC)

CoC	Requirement	Document Reference
<i>Note that condition C15 is not applicable to Stage 1, Package 2 Works. This condition will be addressed by the Construction Heritage Management Plan developed for MPE Stage 1, Package 1.</i>		
C13	prior to the commencement of construction activities affecting the WWII store buildings, the Applicant shall complete all archival recordings. This work shall be undertaken by an experienced heritage consultant, in accordance with the guidelines issued by the Heritage Council of NSW. Within 6 months of completing this work, the Applicant shall submit a report containing archival recordings to the Secretary, Certifying Authority, the Heritage Council of NSW, Liverpool Council and the local Historical Society.	Table 12 HM3
C14	prior to the commencement of construction activities affecting the WWII store buildings, the Applicant shall prepare a Heritage Interpretation Strategy, in consultation with the Heritage Division. The Strategy shall be submitted for the approval of the Secretary with a copy provided to the Certifying Authority.	Table 12 HM4
E12	The Applicant shall not harm, modify or otherwise impact any heritage items outside the subject site.	Table 12 HM5 Table 12 HM6
E34	Construction Environmental Management Plan – Sub Plans As part of the CEMP for the SSD, the Applicant shall prepare and implement a Construction Heritage Management Plan to ensure construction impacts on Aboriginal and non-Aboriginal heritage will be appropriately avoided, minimised and managed. The Plan shall be developed in consultation with OEH, the relevant Council, the NSW Heritage Council (for non-Aboriginal State heritage items) and the relevant Local Aboriginal Land Councils (for Aboriginal heritage), and include, but not necessarily be limited to:	This document
E34 (c) i)	In relation to Aboriginal Heritage:	
E34 (c) i) a)	details of management measures to be carried out in relation to Aboriginal heritage, including a detailed methodology and strategies for protection, monitoring, and conservation of sites and items;	Table 12
E34 (c) i) b)	procedures for dealing with previously unidentified Aboriginal objects (excluding human remains), including cessation of works in the vicinity, assessment of the significance of the item(s) and determination of appropriate mitigation measures, including when works can re-commence, by a suitably qualified and experienced archaeologist in consultation with the Secretary and Aboriginal stakeholders, assessment of the consistency of any Aboriginal heritage impacts against the approved impacts of the SSD, and, where relevant, registration in the OEH's Aboriginal Heritage Information Management System (AHIMS) register;	Table 12 HM17 Section 5.1

CoC	Requirement	Document Reference
E34 (c) i) c)	procedures for dealing with human remains, including cessation of works in the vicinity, notification of Secretary, NSW Police Force, OEH and Aboriginal stakeholders, and commitment to cease recommencing any works in the area unless authorised by the OEH and/or the NSW Police Force;	Table 12 HM18 Section 5.1
E34 (c) i) d)	heritage training and induction processes for construction personnel (including procedures for keeping records of inductions) and obligations under the conditions of this approval including site identification, protection and conservation of Aboriginal cultural heritage; and	Table 12 HM1 Section 5.3
E34 (c) i) e)	procedures for ongoing Aboriginal consultation and involvement for the duration of construction	Section 1.4
E34 (c) ii)	In relation to non-Aboriginal heritage:	
E34 (c) ii) a)	identification of heritage items directly and indirectly affected by construction;	Section 3.2 and 4
E34 (c) ii) b)	consideration of methods to prevent damage to any retained heritage items, including: <ul style="list-style-type: none"> i. procedures for identifying minimum working distances to retained heritage items (including, a minimum, vibration testing and monitoring), ii. detailed options for alteration of construction methodology should preferred values for vibration be exceeded, and iii. commitment to implementing those options if preferred values for vibration are likely to be exceeded. 	Table 12 HM5 Table 12 HM13
E34 (c) ii) c)	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);	Table 12
E34 (c) ii) d)	details of monitoring and reporting requirements for impacts on heritage sites;	Table 12 HM12 Section 6
E34 (c) ii) e)	procedures for dealing with previously unidentified heritage objects, (including cessation of works in the vicinity, assessment of the significance of the item(s) and determination of appropriate mitigation measures including when works can re-commence by a suitably qualified and experienced archaeologist in consultation with the OEH, NSW Heritage Council and the Secretary, assessment of the consistency of any heritage impacts against the approved impacts of the SSD, and, where relevant, notification of the Heritage Council of NSW in accordance with section 146 of the <i>Heritage Act 1977</i> ; and	Table 12 HM17 Section 5.2
E34 (c) ii) f)	heritage training and induction processes for construction personnel (including procedures for keeping records of inductions and obligations under this approval including site identification, protection and conservation of non-Aboriginal cultural heritage; and	Table 12 HM1 Section 5.3
E34 (c) iii)	Mechanisms for the monitoring, review and amendment of the plan.	Section 6

Table 2 Final Compilation of Mitigation Measures (FCMM)

FCMM	Requirement	Document Reference
9A	<p>Aboriginal Heritage</p> <p>Consultation will be maintained with the Aboriginal stakeholders during the finalisation of the Proposal in order to identify long-term curation and management of the Aboriginal objects recovered through the archaeological program (including open salvage excavation).</p> <p>Mitigation measures included in Section 9 of the draft Aboriginal Heritage Impact Assessment (AHMS, 2015) in relation to Aboriginal site, MA14 (artefact scatter and deposit) on the eastern bank of Georges River would be implemented during salvage works.</p>	<p>Section 1.4</p> <p>Section 5.4</p> <p>MA14 not applicable to Stage 1 site. MA14 will be addressed as part of MPE Stage 1, Package 1 CEMP</p>
9B	<p>All relevant personnel and contractors involved in the design of the Proposal will be advised of the relevant heritage considerations, legislative requirements and recommendations in the draft Aboriginal Heritage Impact Assessment (AHMS, 2015)</p>	<p>Table 12 HM1</p> <p>Section 5.3</p>
9C	<p>Management of Aboriginal heritage will be managed through the CEMP for the Proposal. The CEMP will include the following at a minimum:</p> <ul style="list-style-type: none"> • A summary of the findings of the draft Aboriginal Heritage Impact Assessment (AHMS, 2015) • Measures to be implemented in the event of an unexpected archaeological and cultural finds (including human remains) • All relevant personnel and contractors involved in the construction of the Proposal will be advised of the relevant heritage considerations, legislative requirements and recommendations in the draft Aboriginal Heritage Impact Assessment (AHMS, 2015) • Installation of temporary fencing for the protection of the riparian corridor along the western bank of the Georges River • Areas that have been subject to assessment in the draft Aboriginal Heritage Impact Assessment (AHMS, 2015) should be clearly identified on construction plans. Should construction activities be proposed to extend beyond this boundary, appropriate heritage investigations will be undertaken to identify and manage Aboriginal objects/ sites/ places that may be in the additional area(s) 	<p>Section 3.1</p> <p>Section 5.1</p> <p>Section 5.3</p> <p>N/A</p> <p>Table 12 HM5</p> <p>Table 12 HM6</p>
10A	<p>Non-Indigenous Heritage</p> <p>A full photographic record of the SIMTA site should be made prior to Stage 1 construction commencing. This will record the setting and context of the site as a whole prior to any impact on collective significance.</p>	<p>Table 12 HM2</p>

FCMM	Requirement	Document Reference
10B	A heritage interpretation strategy will be prepared, which could include interpretative mediums such as plaques and displays (subject to a suitable area being located) and online resources.	Table 12 HM4
10C	<p>A Heritage Management Plan in adherence to NSW Heritage Council guidelines will be prepared as part of the CEMP for the Stage 1 Proposal. At a minimum the following measures will be included within the Heritage Management Plan:</p> <ul style="list-style-type: none"> Archaeological monitoring during construction will be conducted for a representative sample of the sites PADs F and G (to the south, and south west of Building No. 11, respectively) of former structures. Excavation of these sites will be directed by an Excavation Director, who is experienced in investigations of locally significant archaeology. The archaeologist will assess the likely significance of any archaeological deposits encountered, and provide advice regarding appropriate further action. If unexpected finds are located during works, an archaeological consultant will be engaged to assess the significance of the finds and the NSW Heritage Council notified. Further archaeological work or recording may be recommended. 	<p>This Plan</p> <p>Table 12 HM9</p> <p>Section 5.2</p>

Table 3 Revised Statement of Conditions (RSoC)

RSoC	Requirement	Document Reference
2.0	Aboriginal Heritage	Section 1.4
	Consultation between SIMTA and relevant Registered Aboriginal Parties (RAPs) throughout the design and construction of the SIMTA proposal	Section 5.4
	Where possible, SIMTA should aim to avoid impacting any known Aboriginal heritage objects, sites or places and places that have potential Aboriginal heritage or cultural values, throughout the life of the SIMTA proposal.	This Plan
	Where impact cannot be avoided, SIMTA should choose partial impact rather than complete impact wherever possible and ensure that appropriate measures to mitigate impacts are developed and implemented as required and as appropriate during design, construction and operation of the various stages of the SIMTA proposal.	This Plan
	If relocation of any element of the SIMTA proposal outside area assessed in this study is proposed, further assessment of the additional area(s) should be undertaken to identify and appropriately manage Aboriginal objects/sites/places that may be in this additional area(s).	Table 12 HM11 Table 12 HM15
	In the event that previously undiscovered Aboriginal objects, sites or places (or potential Aboriginal objects, sites or places) are discovered during construction, all works in the vicinity of the find should cease and SIMTA should determine the	Section 5.1

RSoC	Requirement	Document Reference
	subsequent course of action in consultation with a heritage professional, relevant Registered Aboriginal Parties and/or the relevant State government agency as appropriate-	
	Should suspected human skeletal material be identified, all works should cease and the NSW Police and the NSW Coroner's office contacted. Should the burial prove to be archaeological of Aboriginal origin, consultation with a heritage professional, relevant RAPs and/or the relevant State government agency, should be undertaken by SIMTA.	Section 5.1
	SIMTA should ensure that any reports or documents for the SIMTA proposal concerning Aboriginal heritage comply with applicable statutory requirements (those currently applicable are outlined in this report), are prepared in accordance with best practice professional standards and, where appropriate, ensure findings are provided to OEH AHIMS Registrar and the relevant RAPs.	Section 5.1
	The detailed application for the first stage of works shall include test excavations in each of PADs 'I' - 3 in accordance with current archaeological practice and any relevant guidelines to determine the nature, extent and significance of any Aboriginal archaeological deposit. Such testing would be undertaken under Section 75U of the Environmental Planning and Assessment Act 1979, and be used to inform the assessment of these areas prior to lodgement of the subsequent staged application.	Applicable to MPE Stage 1, Package 1 – Rail Link
	Non-Indigenous Heritage Preparing a Statement of Heritage Impact (SoHI) for submission to the Minister for Planning and infrastructure as part of staged planning applications at State level.	Refer to Heritage Assessment (Artefact 2015)
	Commencing discussions with the appropriate heritage bodies regarding the potential listing of the DNSDC site on the National Heritage List or the State Heritage Register.	Refer to Heritage Assessment (Artefact 2015)
	Preparing a Statement of Heritage Impact for each stage, including the legal status of the site and advice on required actions depending on whether the site is listed or unlisted at the time that approval is sought.	Refer to Heritage Assessment (Artefact 2015)
	Development of an overall mitigation strategy for the DNSDC site, which may be based on Table 3 of the Non-Indigenous Heritage report.	Table 12
	Undertaking further archaeological assessment and investigation or monitoring, where required in areas designated as having archaeological potential that would be impacted by the proposal. The SoHIs for each stage should address the archaeological potential within the development area for each stage	Refer to Heritage Assessment (Artefact 2015) Table 12
	If any archaeological deposit or item of heritage significance is located within the study area and is at risk of being impacted, the NSW Heritage Council should be notified and a heritage	Section 5.2

RSoC	Requirement	Document Reference
	consultant archaeologist should be engaged to assess the item to determine its heritage significance.	

Table 4 Commonwealth Approvals

Commonwealth	Requirement	Document Reference
7	For better protection of Commonwealth land, the person taking the action must engage a suitably qualified expert (s) to prepare a Construction Environment Management Plan (CEMP), for the approval of the Minister. The CEMP must include in relation to construction of the proposed facility.	Refer to CEMP
7b	Identification and quantification of all potential impacts associated with noise, vibration, air quality, traffic, light spill, hydrological changes, contamination and indigenous heritage upon Commonwealth land. Consideration must be given to people and communities at SME, DNSDC, Defence housing, and the environment more generally in neighbouring bushland area.	Refer to CEMP
7c	The results of further investigations with regard to land contamination and indigenous heritage impacts (specifically PADs two and three). If adverse impacts are identified, details on how such matters will be managed/mitigated must also be provided. Evidence of ongoing consultation with RAPs regarding further investigations for indigenous heritage objects/places must be provided.	Refer to Heritage Assessment (Hyder 2015)

There are no specific conditions relating to Heritage Management in the Concept Plan Conditions of Approval.

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1 INTRODUCTION

The Sydney Intermodal Terminal Alliance (SIMTA) received approval for the construction and operation of Stage 1 of the Moorebank Precinct East (MPE) Project, comprising an Intermodal (IMT) Facility including a rail link (Package 1) and Import Export (IMEX) Terminal (Package 2) on 12 December 2016 (SSD 6766). The construction and operation of the MPE Stage 1 Project was subject to an appeal in September 2017 (Appeal Number 2017/00081889). The approval was upheld and the revised Conditions of Consent (CoC) were released on 13 March 2018.

This Construction Heritage Management Plan (CHMP) has been developed to manage impacts to heritage issues during the construction of Package 2 of the MPE Stage 1 Project (hereafter referred to as the Project).

Within this plan, a strategy has been established to demonstrate the contractor's approach to the management of heritage values. The CHMP also accounts for requirements of the MPE Stage 1 Project Environmental Impact Statement (EIS) [Appendix T - Aboriginal Heritage Impact Assessment and Appendix U - Non-Indigenous Heritage Impact Assessment].

This CHMP addresses the relevant requirements of the Project Approvals, including the EIS, Submissions Report and Minister's Conditions of Consent (CoC), and all applicable guidelines and standards specific to the management of heritage impacts during construction of the Project.

1.1 Background and Scope

The MPE Project site is located approximately 27 kilometres (km) south-west of the Sydney Central Business District (CBD) and approximately 26 km west of Port Botany and includes the former Defence National Storage and Distribution Centre (DNSDC) site.

The MPE Project involves the development of an IMT, including warehouse and distribution facilities, rail link, freight village (ancillary site and operational services), stormwater, landscaping, servicing and associated works on the eastern side of Moorebank Avenue, Moorebank. It is to be developed in three key stages:

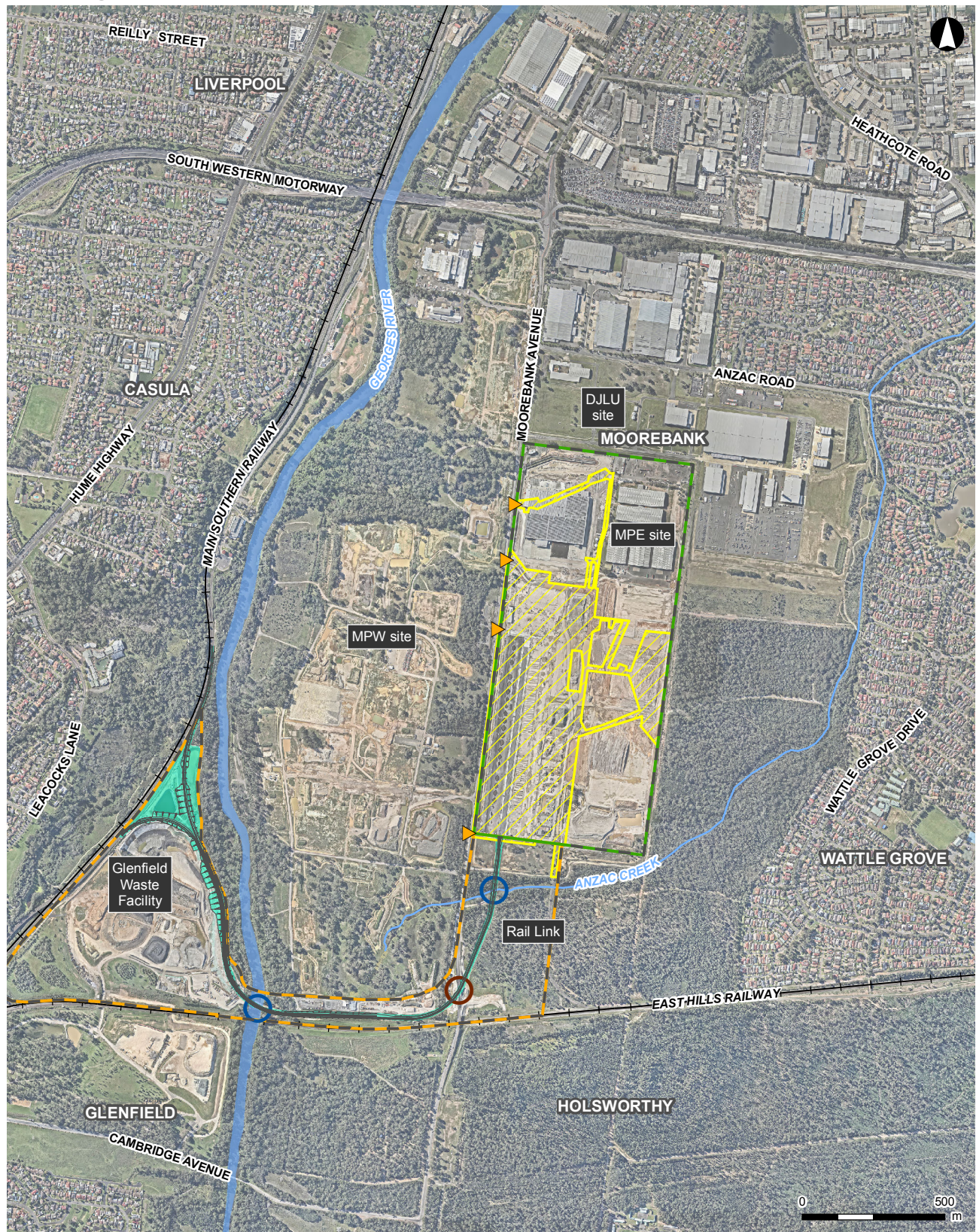
- Stage 1 - Construction of the IMEX and Rail link
- Stage 2 - Construction of warehouse and distribution facilities
- Stage 3 - Extension of the IMEX and completion of Warehouse and Distribution Facilities.

Stage 1 of the MPE Project comprises, and will be constructed across, two packages:

- Package 1: The Rail Link (not included within this CHMP) includes a connection to the IMEX, and traverses across Moorebank Avenue, Anzac Creek and Georges River prior to connecting to the Southern Sydney Freight Line (SSFL)
- Package 2 (Figure 1): The IMEX (subject of this CHMP) includes the following key components:
 - Truck processing, holding and loading areas - entrance and exit from Moorebank Avenue
 - Rail loading and container storage areas – installation of four rail sidings with adjacent container storage area serviced by manual handling equipment initially and overhead gantry cranes progressively
 - Administration facility and associated car parking- light vehicle access from Moorebank Avenue.

The layout of the IMEX generally comprises operational areas, an administration area, rail sidings, utilities and drainage infrastructure, landscaping and signage. The operational areas of the IMEX consist of the primary and secondary container loading / unloading areas and container storage areas, and the truck holding area. Within these areas containers will be stacked up to five high.

MPE Stage 1 CHMP



LEGEND

- | | |
|-----------------------------------|----------------------|
| Project site | Creek/River crossing |
| Construction footprint | Road crossing |
| MPE site | Rail link |
| Rail Corridor | Existing railway |
| MPE Stage 1 Package 1 (Rail Link) | Watercourse |
| Site access point | |

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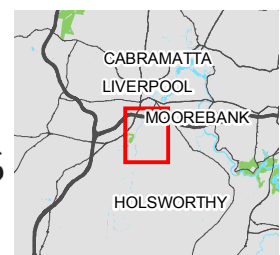


Figure 1: MPE Stage 1, Package 2 Site Overview

1.1.1 Environmental Planning Approval

The Project has been assessed by the Department of Planning and Environment (DP&E) under Division 4.7 (Division 4.1 prior to March 2018) of the *Environmental Planning and Assessment Act 1979* (EP&A Act) as State Significant Development (SSD). The Planning Assessment Commission (PAC) granted Approval for the Project on 12 December 2016 and is subject to the Minister's Conditions of Consent (CoC, 18 December 2016 (ref SSD-6766)). The MPE Stage 1 Project, its impacts, consultation and mitigation were documented in the following suite of documents:

- State Significant Development Application SSD 6766 (as amended in the Land and Environment Court 13 March 2018)
- SIMTA Intermodal Terminal Facility – Stage 1 – Environmental Impact Statement (Hyder Consulting Pty Ltd, May 2014)
- SIMTA Intermodal Terminal Facility – Stage 1 – Response to Submissions (Hyder Consulting Pty Ltd, September 2015)
- *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) Approval (No. 2011/6229) granted on March 2014.

1.2 Purpose and Application

Within the submission of planning approval for MPE Stage 1, Archaeological Heritage Management Service (AHMS) undertook an Aboriginal Heritage Impact Assessment (AHMS, 2015) and Artefact prepared a Non-Indigenous Heritage Impact Assessment (Artefact 2015). SIMTA have developed this CHMP based on these initial impact assessments, and to address the project approvals as outlined in Section 1.1.1. This plan aims to demonstrate how heritage impacts will be managed during construction of the Project.

This plan provides methods to measure and reduce the impact to heritage values by the contractor during the construction of the Project, including all contractor and consultant partners.

1.3 Objectives and Targets

This CHMP provides the basis for the management of heritage issues and to minimise risk of impact during the first stage of development. The objectives and targets of heritage management and mitigation are outlined in Table 5.

Table 5 Objectives and Targets

Objectives	Performance indicators
<ul style="list-style-type: none"> To correctly implement heritage management controls to ensure impacts are minimised during construction and to comply with contractual and legislative requirements Avoid accidental impacts on heritage items through implementation of an unexpected heritage finds procedure Maximise the Project personnel's awareness of aboriginal and non-aboriginal heritage 	<ul style="list-style-type: none"> No disturbance or damage to existing known heritage sites or items Unknown or undocumented heritage sites are not knowingly destroyed, defaced or damaged Consult with all relevant stakeholders, including the Registered Aboriginal Parties (RAPs), prior to impacts in areas deemed to have Aboriginal archaeological potential as assessed in this plan, and/or upon the discovery of unexpected Aboriginal objects or cultural features. No harm, destruction or defacement of unexpected relics of State significance and/or human remains, including Aboriginal burials, will occur.

1.4 Consultation

This CHMP has been prepared in consultation with the Office of Environment and Heritage (OEH), Liverpool City Council, the NSW Heritage Council (for non-Aboriginal State heritage items) and relevant Local Aboriginal Land Councils (for Aboriginal heritage) as outlined below (Table 6). Supplementary information to support the consultation undertaken is included in Appendix A.

Table 6 Consultation Summary

Agency	Date	Person Contacted	Comment	Status
OEH	22/12/16	██████████	Contacted by phone to inform the CEMP would be submitted mid-January. OEH Stated they were happy to receive.	Open
	23/01/17	██████████	Contacted by phone to inform the CEMP would be submitted 1 February with a consultation period of 2 weeks. No answer, voice message left.	Open
	25/01/17	██████████	Phone call received from OEH. OEH stated they were happy to receive the documents and make comment within given timeline.	Open
	1/02/17	██████████	Email sent containing briefing note CEMP, CHMP and CFFMP for review, reiterating February 15 deadline for comments.	Open
	8/02/17	██████████	Phone call and email sent to track progress of document reviews. No answer, voice message left Response received stating that documents were unable to be opened. The documents were resent via email.	Open

Agency	Date	Person Contacted	Comment	Status
	16/02/17	██████████	Phone call and email sent to remind OEH that deadline has passed and any comments would need to be submitted ASAP.	Open
	16/02/17	██████████	Comments on CFFMP received, it was advised that OEH were unable to provide comments on the CHMP and CEMP.	Open
	20/02/17	██████████	Email sent to indicate how comments have been addressed within Draft Document (to be submitted to DP&E). (See Appendix A). Consultation complete	Closed
Liverpool City Council	25/01/17	██████████	Phone call made to inform of CEMP and sub plans that would be provided for comment from 1 February to 15 February. LCC indicated they would be happy to receive and provide comment.	Open
	01/02/17	██████████	Email sent containing briefing note, CEMP, CSWMP, CTAMP, CHMP, reiterating the two-week deadline for comments received.	Open
	08/02/17	██████████	Phone call made on 8 February to confirm receipt of documentation and review progress.	Open
	15/02/17	██████████ ██████████	Email received containing comments. Confirmation email sent to acknowledge receipt of comments. Consultation complete	Closed
Campbelltown City Council	24/01/17	██████████	Phone call made. Voice message left outlining provision of CEMP and sub-plans at the beginning of February. Follow up email was sent to ██████████ ██████████ on 25 January.	Open
	1/02/17	██████████	Email sent containing briefing note, CEMP, CSWMP, CTAMP, CHMP, reiterating the two-week deadline for comments received.	Open
	08/02/17	██████████	Phone call and email sent to confirm receipt of documentation and review progress. No answer, voicemail left.	Open

Agency	Date	Person Contacted	Comment	Status
	15/02/17	██████████	Phone call made to notify comments deadline. Extension for comments deadline granted to 17 February	Open
	17/02/17	██████████	Email received with comments relating to plans. No comments were received regarding the CHMP. Consultation complete	Closed
NSW Heritage Council	25/01/17	██████████	Email sent to outline the provision of the CHMP and deadline for comments.	Open
	31/01/17	██████████	Phone call received indicating that all subsequent consultation should be undertaken through DP&E.	Open
	01/02/17	██████████	Email provided containing CHMP for comment.	Open
	15/02/17	██████████	Phone call made to notify comments deadline. Extension for comments deadline granted to 17 February.	Open
	20/02/17	██████████	Email received with comments regarding CHMP attached	Open
	21/02/17	██████████	Email sent to indicate how comments were addressed within the CHMP.	Open
	09/03/17	██████████	Email received with additional NSW Heritage Council comments.	Open
	17/03/17	██████████	Email sent to Nina Pollock 20 March indicating how additional comments were addressed. Consultation complete	Closed
Tharawal Local Aboriginal Land Council	23/01/17	██████████	Email sent to outlining future consultation process.	Open
	23/01/17	██████████	Acknowledgement of email received. It was stated that TLALC would be happy to review and provide comment on CHMP.	Open
	1/02/17	██████████	Email sent containing briefing note and CHMP, reiterating the consultation period and deadline.	Open
	9/02/17	██████████	Phone call and email sent to confirm receipt of documentation and review progress.	Open

Agency	Date	Person Contacted	Comment	Status
	15/02/17		Phone call made to notify comments deadline. Extension for comments deadline granted to 16 February.	Open
	16/02/17		Email received stating TLALC had reviewed the CHMP and had no comments or recommendations.	Closed

Ongoing consultation will be undertaken with the RAPs as part of the requirements of this CHMP, in particular Tharawal Local Aboriginal Land Council (refer to Section 5.4).

2 ENVIRONMENTAL OBLIGATIONS

Table 7 below details the legislation and planning instruments considered during development of this subplan.

Table 7 Legislation and Planning Instruments

Legislation	Description	Relevance to this CHMP
<i>Environmental Planning and Assessment Act 1979</i>	This Act establishes a system of environmental planning and assessment of development proposals for the State.	The DA conditions and obligations are incorporated into this CHMP.
<i>Environment Protection and Biodiversity Conservation Act 1999 (Cwth)</i>	<p>The main purpose of this Act is to provide for the protection of the environment especially those aspects that are of national environmental importance and to promote ecological sustainable development.</p> <p>Heritage places are listed on the National Heritage List (NHL) for their 'outstanding heritage value to the nation' and are owned by a variety of constituents, including government agencies, organisations or individuals. Only items owned or controlled by the Commonwealth that have been meet the threshold for national heritage listing under the Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act) are listed on the Commonwealth Heritage List (CHL) and afforded protection under the EPBC Act.</p>	<p>The project as a whole is a controlled action under the EPBC Act with controlling provisions related mainly to the Rail connection.</p> <p>The Defence National Storage and Distribution Centre (DNSDC), which includes the Moorebank Intermodal Terminal Development site was previously included on the Commonwealth Heritage List (CHL) as a Listed Place for its historic heritage values. As the Department of Defence lease has now expired and the site is no longer controlled by the Commonwealth it is no longer included on the CHL. It is listed as a Heritage item on Liverpool Local Environment Plan (LEP) which provides protection under the provisions of the EP&A Act 1979.</p>
<i>National Parks and Wildlife Act 1974</i>	<p>The relevance of this Act is firstly in respect to the protection and preservation of aboriginal artefacts. Discovery of material on site suspected as being of aboriginal origin must be reported and protected pending assessment and direction by the Client's Representative.</p> <p>Secondly it is an offence under Part 8A of this Act to pick or harm threatened species. (Refer to the notes under the Threatened Species Conservation Act for more information)</p>	<p>Aboriginal Heritage Items have been identified within the construction area. An Aboriginal heritage impact permit under section 90 of the <i>National Parks and Wildlife Act 1974</i> is not required for works approved under Part 4.1 of the EP&A Act.</p>

Legislation	Description	Relevance to this CHMP
<i>Heritage Act 1977</i>	<p>This Act provides for the preservation and conservation of heritage items such as building, works, relic, places of historic interest, scientific, cultural, social, archaeological, architectural, natural or aesthetic significance.</p> <p>It is an offence under this Act to wilfully and knowingly damage or destroy items of heritage value.</p> <p>Do not demolish damage, move or develop around any place, building, work, relic, moveable object, precinct, or land that is the subject of an interim heritage order or listing on the State Heritage Register or heritage listing in a Local Environmental Plan without an approval from the Heritage Council (NSW) or local council.</p>	<p>Heritage Items are identified on the site and addressed as part of the CoC. An approval under Part 4, or an excavation permit under section 139, of the <i>Heritage Act 1977</i> is not required for works approved under Part 4.1 of the EP&A Act.</p>
<p><i>Australian Heritage Council (Consequential & Transitional Provisions) Act 2003</i></p> <p><i>Australian Heritage Council Act 2003 (Cwth)</i></p>	<p>The Australian Heritage Council (Consequential and Transitional Provisions) Act 2003 repealed the Australian Heritage Commission Act 1975.</p> <p>The Australian Heritage Council Act 2003 establishes the Australian Heritage Council. The Council is required to identify places to be included in the National Estate and to maintain a Register of the National Estate of places.</p>	<p>The site is not on Register of the National Estate of places.</p>
<i>Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cwth)</i>	<p>This Act provides for the preservation and protection from injury or desecration to areas and objects of particular significance to Aboriginals. Areas and objects can be protected by Ministerial Declaration and it is then an offence to contravene such a declaration.</p>	<p>No areas or objects within the works site have been identified as being subject to such a declaration and this Act is of little relevance to the project.</p>

2.1 Guidelines

Additional guidelines and standards relating to the management of Aboriginal and historic cultural heritage include:

- Code of Practice for the archaeological investigation of Aboriginal objects in NSW (OEH 2010)
- Aboriginal cultural heritage consultation requirements for proponents 2010 (OEH 2010)
- Due Diligence Code of practice for protection of Aboriginal objects in NSW (OEH 2010)
- Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW
- Guide to Aboriginal Heritage Impact Permit processes and decision making
- Applying for an Aboriginal Heritage Impact Permit: Guide for Applicants
- Assessing Heritage Significance (NSW Heritage Office 2001)
- Levels of Heritage Significance (NSW Heritage Office 2008)
- Assessing Significance for Historical Archaeological Sites and Relics (NSW Heritage Branch, Department of Planning 2009)
- Investigating Heritage Significance (NSW Heritage Office 2001)
- NSW Government's Aboriginal Participation in Construction Guidelines (2007).
- How to Prepare Archival Recording of Heritage Items (Heritage Branch 1998).
- Photographic Recording of Heritage Items Using Film or Digital Capture (Heritage Branch 2006).

3 EXISTING ENVIRONMENT

The Project site was recently operating as the Defence National Storage and Distribution Centre (DNSDC) however Defence has recently relocated this operation and vacated the site. The majority of land immediately surrounding the site is owned and operated by the Commonwealth and comprises:

- Holsworthy Military Reserve to the south of the site on the southern side of the East Hills Passenger Railway Line;
- Commonwealth Residual Land, to the east between the SIMTA site and the Wattle Grove residential area; and
- Defence National Storage and Distribution Centre (DNSDC), to the north and north east of the SIMTA site.

The land on the western side of Moorebank Avenue is referred to as Moorebank Precinct West (MPW).

The existing environment and heritage context of MPE has been assessed in the following background reports prepared to support the Environmental Impact Statement (EIS) for the Project:

- Aboriginal Heritage Impact Assessment, prepared by Archaeological Heritage Management Service (AHMS) in 2012 and updated in 2015; and
- Non-Aboriginal Heritage Impact Assessment, prepared by Artefact Heritage in 2012 and updated in 2015.

These reports have been used as the basis of this management plan.

3.1 Aboriginal Heritage

Steele and Dallas (2001) undertook a heritage assessment of the Moorebank Defence area (including the Project site), and describes the site as:

'Whilst no evidence for Aboriginal occupation or visitation was identified through this study [Dallas, 2000 Cited in Steele & Dallas 2000], it is likely that this outcome is principally the result of the fact that the entire DNSDC [SIMTA site] has been substantially developed through a combination of cutting, levelling, landscaping and construction. Given the extent of the previous land use, the likelihood of intact archaeological deposits surviving within this portion of the Moorebank Defence area has been assessed to be minimal' (Steele & Dallas, 2001: 14.).

The Moorebank Defence area was mapped for its archaeological sensitivity, as shown in Figure 2 below. The Project site was assessed as having no archaeological potential.

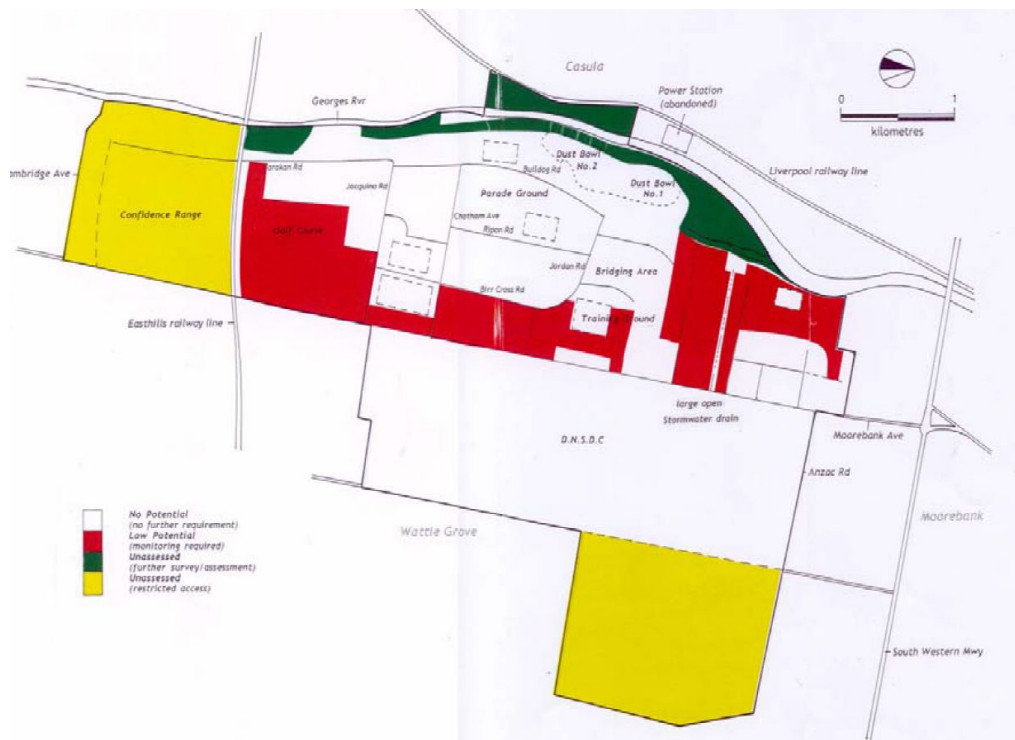


Figure 2 Archaeological Sensitivity of the Moorebank Defence Area (Steele & Dallas 2001).

The Project site was subject to additional survey by AHMS in 2012. This survey identified seven isolated Aboriginal objects and three areas of Potential Archaeological Deposit (PAD). Of the identified sites, one isolated object (Isolated Find #1) occurs within the SIMTA Project site (outside of the Project site), and three isolated objects and one potential archaeological deposit (PAD 3) occur within close proximity (Figure 3). Descriptions of these sites are provided in Table 8. Areas of archaeological sensitivity mapped by AHMS (2012) are shown in Figure 4.

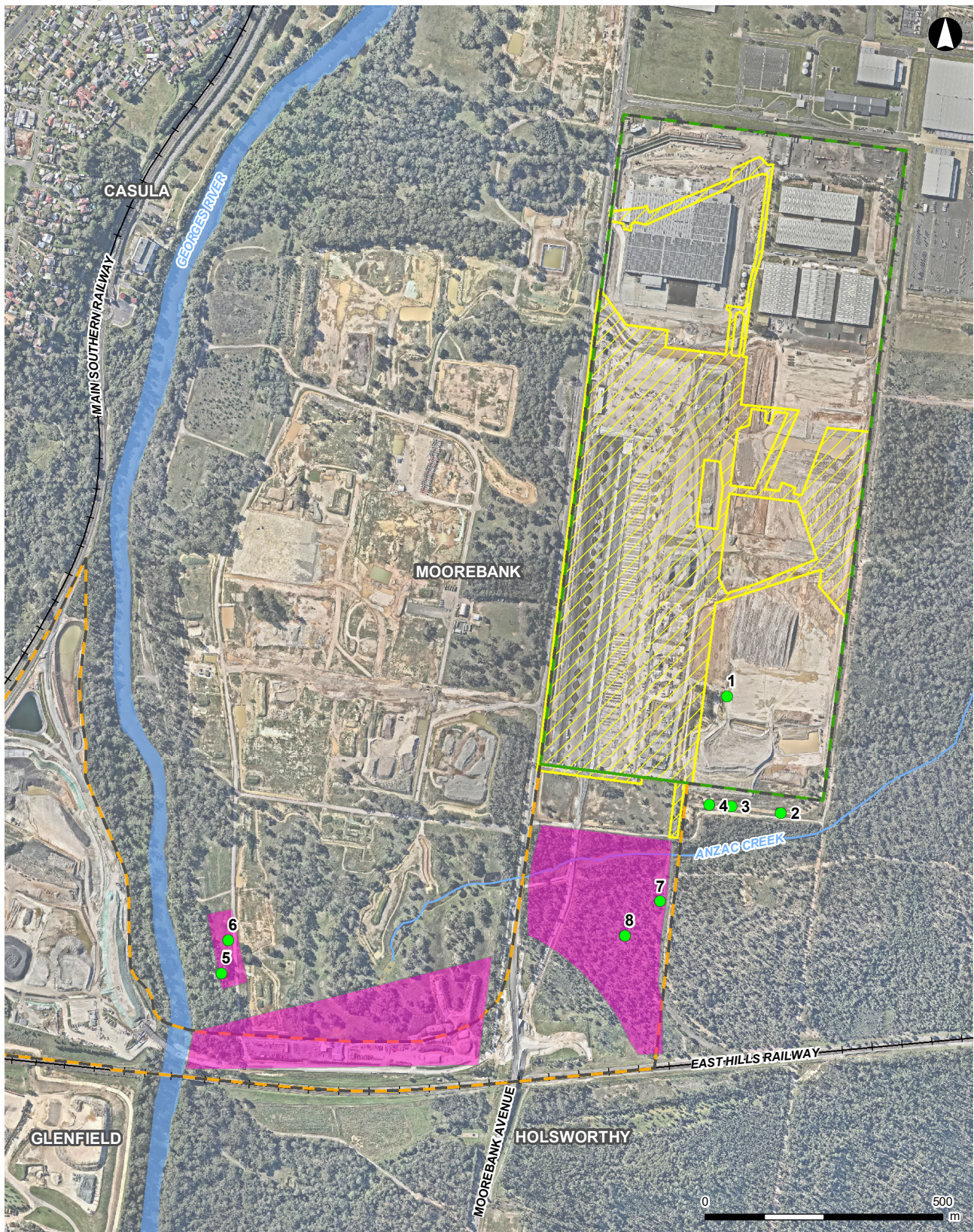
The Secretary's Environmental Assessment Requirements (SEARs) provided for the Project identified the need to further characterise the potential impacts of the development on Aboriginal heritage at the site. AHMS subsequently prepared an updated Aboriginal Heritage Impact Assessment to provide further characterisation of a series of Potential Archaeological Deposits (PADs) associated with the banks of the Anzac Creek and Georges River (AHIMS 2015).

Six test pits were dug within PAD 3, to the south of the Project site. No Aboriginal artefacts were recovered from these test pits and the area was found to be heavily disturbed in places showing signs of material movement from bulldozing and dumping of waste material including building rubble (AHMS 2015). It is therefore determined that there is a low potential for archaeological deposits to be located in this area and the location is no longer identified to be a PAD.

Table 8 Previously Recorded Indigenous Heritage Sites within (or close to) the Project site

Site Name	Location	Description (AHMS 2012)
PAD 3 <i>no longer recognised as a PAD</i>	South of the Project site	<p>Wooded area bounded by SIMTA site to north, disused rail line to east and Moorebank Ave to south.</p> <p>One of the RAPs indicated that several very old paperbarks (<i>Melaleuca</i> sp.) in PAD 3 were culturally significant. Although they did not appear to be culturally modified, mature examples of this species are now rare in the area. They were used traditionally by Aboriginal people for food. The bark was also used for wrapping babies and starting fires.</p> <p>Another RAP identified a feature in PAD 3 that he believed to be culturally significant. He indicated that it was potentially a ground oven that may even contain a burial underneath.</p> <p>Additional survey and archaeological test pitting was undertaken by AHMS in 2015. The area was found to be heavily disturbed in places showing signs of material movement from bulldozing and dumping of waste material including building rubble (AHMS 2015). It is therefore determined that there is a low potential for archaeological deposits to be located in this area and the location is not identified to be a <i>PAD</i>.</p>
Isolated Find #1	Located outside of the Project impact area.	Mudstone complete flake; found in sandy clay, flat cleared area
Isolated Find #2	South of the Project site	Mudstone possible flake core; found near vehicle track in mud.
Isolated Find #3	South of the Project site	Red/black silcrete possible core with one negative flake scar; found near vehicle track in mud.
Isolated Find #4	South of the Project site	Chert core with 8 negative flake scars; found near vehicle track in mud.

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LEGEND

- Project site
- Rail Corridor
- MPE site
- Construction footprint
- Existing railway
- Watercourse
- Isolated finds
- Potential archeological deposits

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 Coordinate System: GDA 1994 MGA Zone 56
 Aerial imagery supplied by nearmap (March, 2019)

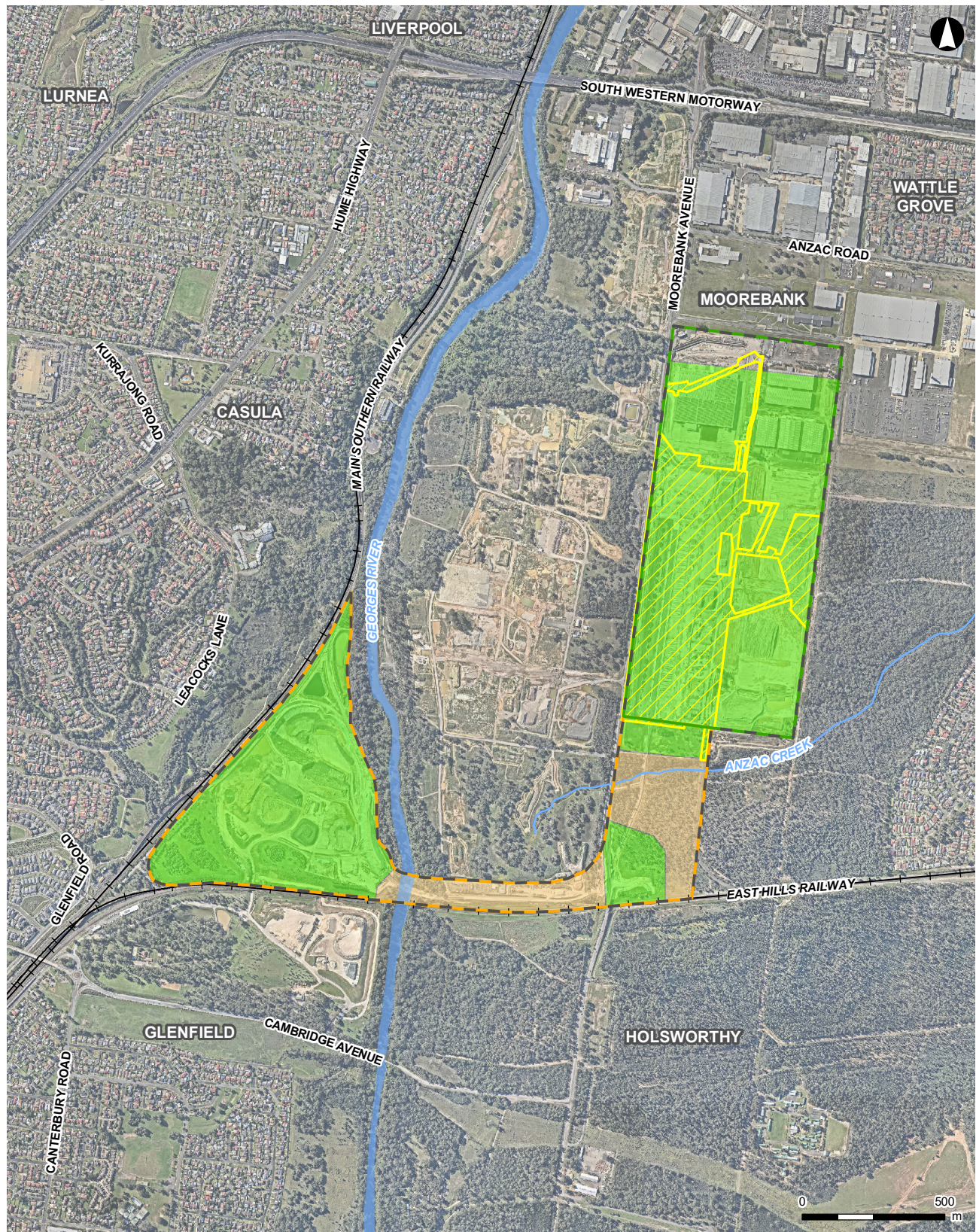
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SIMTA SYSTEMS
INTEGRATION
MANAGEMENT
ALLIANCE



Figure 3: Previously recorded aboriginal heritage sites (AHMS 2012)

MPE Stage 1 CHMP



LEGEND

- | | |
|------------------------|--|
| Project site | Area Assessed as having Aboriginal Archaeological potential based on background Data |
| Rail Corridor | Area highly disturbed and retain little potential for aboriginal objects to occur |
| MPE site | |
| Construction footprint | |
| Existing railway | |
| Watercourse | |

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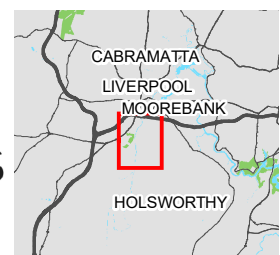


Figure 4: Area of archaeological sensitivity

3.2 Non-Aboriginal Heritage

The Defence National Storage and Distribution Centre (DNSDC), which includes the Project site was previously included on the Commonwealth Heritage List (CHL) as a Listed Place for its historic heritage values (CHL Place ID # 105641). As the Department of Defence lease has now expired and the site is no longer controlled by the Commonwealth it is no longer included on the CHL, however, it is listed as a heritage item on the Liverpool Local Environment Plan (LEP). The values of the site predominantly relate to its continuous use as a military storage facility since WWI, and several rare and representative buildings including the WWII post and beam warehouses.

Several areas of archaeological potential have also been identified within and in proximity to the Project site.

3.2.1 Historic Context

As described by Artefact (2012) the first land parcels within the Liverpool area were granted in 1798. The road connecting Liverpool and Sydney was established in 1813 and settlement in the region grew rapidly. Parish maps indicate that the Moorebank Intermodal Terminal Development site formed part of the 'PE Barker' Orchard and Vineyard in 1888 (Figure 5) (Artefact 2012).

Military activities occurred within the local region from the early 1900s, and the area north of the Project site was utilised for training camps during this time. By 1907 a military camp was established on the eastern side of the Georges River, which included the Project site. Following a recommendation that a large central training ground should be established in each state, large plots of land were acquired within Liverpool by the Government for use as permanent military camps (Artefact 2012).

By 1913, the Liverpool camp accommodated 2000 troops in tents and became the main training centre in New South Wales. Plans dating to this period show Liverpool camp located between the Georges River and Moorebank Avenue. To the east of the camp was an area marked 'stores' which included the northern portion of the MPE. To the east of the site was a rifle range. The camp was further developed in the lead up to WWI including the development of huts, kitchens mess buildings etc. (Artefact 2012).

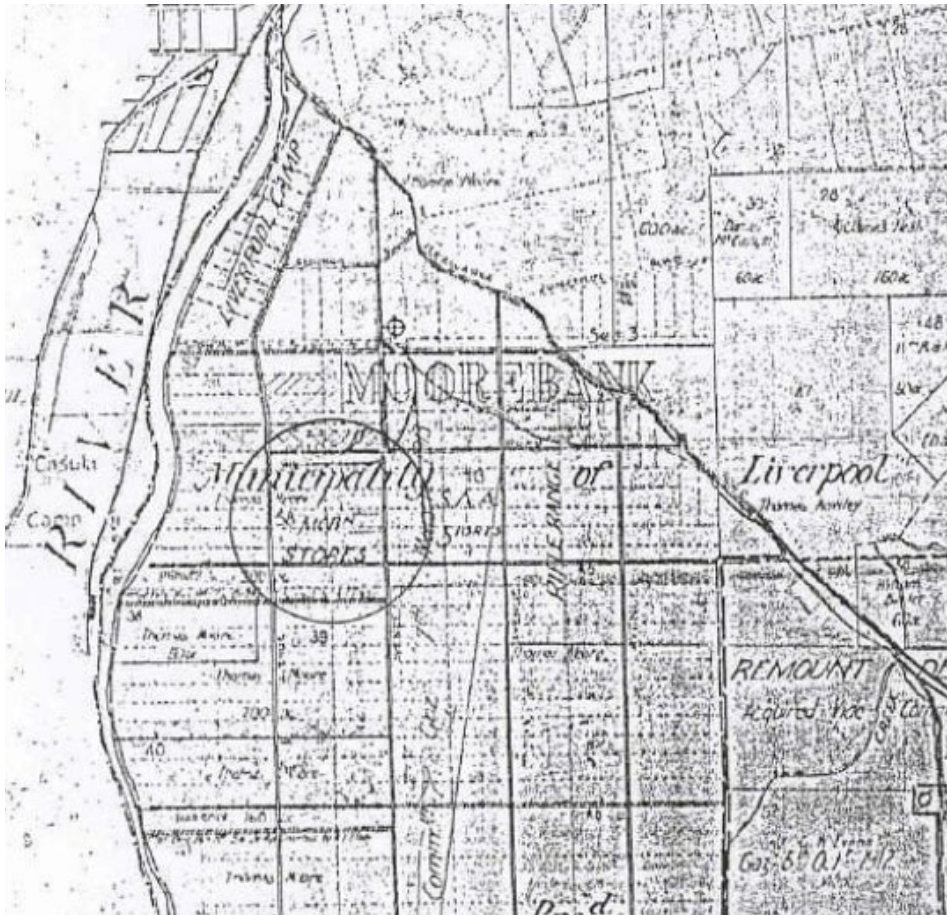


Figure 5 Site layout (Artefact Heritage 2015).

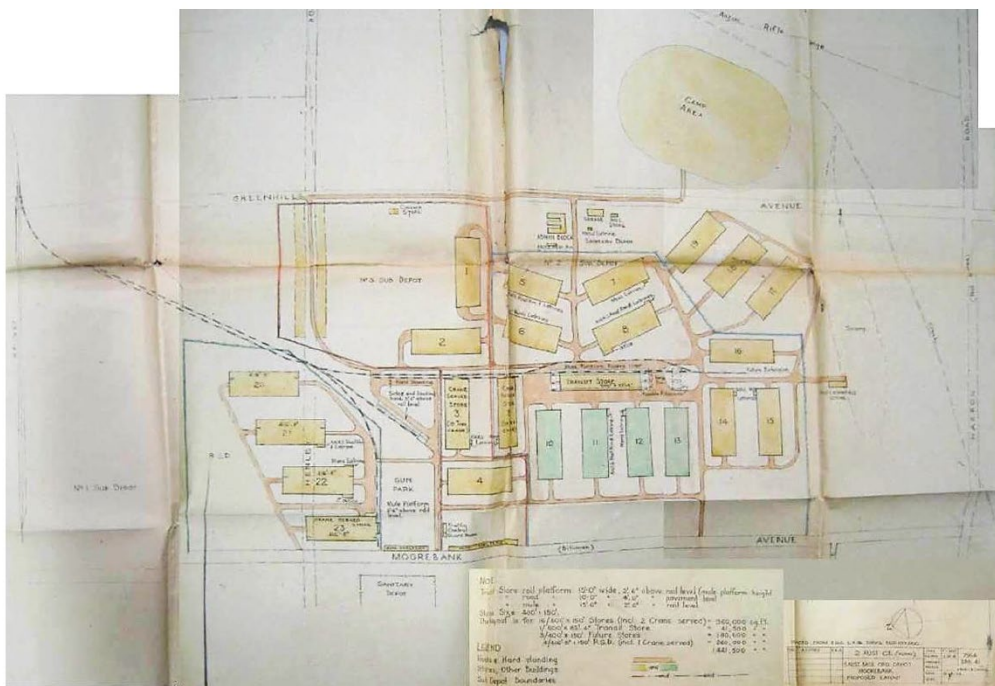


Figure 6 Plan of proposed layout of Moorebank Ordnance Depot 25/4/44 (NAA SP459/1, 420/7/1153) (Artefact 2012).

Further development of military sites occurred during the beginning of WWII. The School of Military Engineering (SME) was established to the east of the Georges River and west of the Project site. In September 1943 it was proposed that Ordnance Stores be established at Moorebank and a plan was developed by December that year. Approval was subsequently granted in February which formed the first construction phase of the DNSDC site (which includes the Project site) (Artefact 2012). A plan from April 1944 shows the proposed layout which included:

- 17 stores (400' x 150' in size).
- Two crane served stores (400' x 150').
- 19 offices attached to each store (40' x 20').
- One transit store (500' x 83'4").
- Office acc. inside transit store.
- One cinematograph store (60' x 40').
- Two inflammables stores (100' x 50'). 20, 000 square feet of equipment shelters.
- One traffic control building (18' x 17'8").
- One strong room (50' x 50').
- One Depot Administration building in three blocks (135'4" x 111' combined size).
- One combined garage, service station, fire station, P.O.L store, Tpt office (97' x 25').
- One SW guard house (60' x 20').
- One case making building (3,750 square feet).
- Seven men's latrines.
- Three AWAS latrines.
- Three AWAS latrines and rest rooms (NAA: SP459/1, 420/7/1153) (Artefact 2012)



Figure 7 Aerial photograph showing the Ordnance Depot/DNSDC in 1951 (Brookes & Associates 2002:9).

Aerial photographs indicate that little changed at the site between the late 1940s and early 1990s. In the early 1990s the site became the DNSDC as part of a reorganisation of defence supply services and warehousing arrangements. During the refurbishment of the DNSDC five of the original 20 store buildings (five of which occur within the Project site) were demolished and replaced with larger modern buildings. The remaining WWII store buildings were reclad at this time. Modern steel sheeting replaced the original asbestos walls and new concrete floors were laid. Various WWII structures in the study area were also demolished during this time. Modern ancillary buildings including administrative buildings, workshops and amenities were constructed throughout the complex, twenty of which occur within the Project site (Artefact 2012).

3.2.2 Existing Non-Aboriginal Heritage Values

As described by Artefact (2012) the SIMTA site is significant as a largely intact network of WWII era buildings, roads, drains and rail sidings. It embodies important heritage values and was assessed as being of state and Commonwealth heritage significance.

The Defence National Storage and Distribution Centre (DNSDC), which includes the Project site was previously included on the Commonwealth Heritage List (CHL) as a Listed Place for its historic heritage values. Specifically, it was included for its Processes (a), Rarity (b), Characteristic (d) and social (g) values. The Statement of Significance provided in the site's CHL listing is provided below.

The Defence National Storage and Distribution Centre (DNSDC) is historically highly significant. As a military storage site it dates from 1915, and the Centre is important for its associations with the development of Australia's military forces prior to and during the First World War and particularly for its direct association with the military build up in the early years of the Second World War. The DNSDC has continued to play an important role in Australia's military infrastructure, right up to the present time. The place also has an association with early nineteenth century settlement in the Liverpool area. (Criterion A.4) (Themes: 7.7 Defending Australia, 7.7.1 Providing for the common defence, 7.7.3 Going to war)

The DNSDC contains twenty Second World War post and beam warehouses, many of which, despite being re-clad, are good examples of their type. Particularly important are the fifteen timber post and beam military warehouses of the nine-bay type which played such an important role during the war and which were the widest post and beam military warehouses. Also important are the three composite steel and timber type warehouses. Post and beam military warehouses are small in number today, giving those at this site substantial rarity value. Additional interest is inherent in the fact that the buildings are understood to have been prefabricated in the United States and shipped to Australia in the early 1940s. Further, the alignment of part of the former military railway system is evidenced by the alignment and siting of some of the buildings and roads at the site. (Criteria D.2 and B.2)

The Centre is of social value for Defence personnel, for the Liverpool community and for the broader Sydney community on account of the long-term Defence associations with the site. (Criterion G.1)

The key heritage values of the site are:

- Its continuous use as a military storage site since 1915
- Its importance for associations with the development of Australia's military forces during WWI
- For the WWII post and beam warehouses present at the site which are good and rare examples of this type

Within the Project site, impacts to state listed heritage are expected to include the removal of five of the twenty WWII structures, the original road and open drain alignments, possible impacts to potential archaeological material associated with former structures, impacts to underground water mains and sewerage lines dating to the 1940s, and significant impacts to the setting and context of remaining WWII-era buildings.

The heritage buildings are identified in Figure 8.

MPE Stage 1 CHMP



LEGEND

- | | |
|------------------------|--|
| Project site | WWII QM (Quarter Master's) store |
| Construction footprint | WWII carpentry workshop |
| MPE site | WWII composite timber and steel store building |
| Site access point | WWII timber post and beam store building |
| Watercourse | Modern building, c. 1990s |
| Pre-1958, type unknown | |

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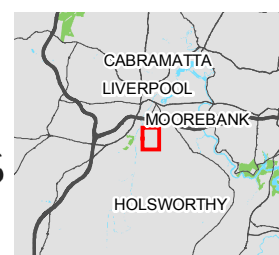


Figure 8: Location of Heritage Buildings and Proposed Works

3.2.3 Areas of Archaeological Potential

Artefact Heritage (2015) also identified several areas of historic heritage archaeological potential, as shown in Figure 9 and described in Table 9.

There is low potential for unexpected archaeological deposits dating to the pre-WWI, WWI and Interwar periods to be uncovered and if these remains existed they are likely to have been impacted by WWII development of the site. The research potential of these deposits would not be high, and the majority of Potential Archaeological Deposits (PADs) have been assessed as unlikely to meet the threshold for local significance. This is due to a number of factors, either ground disturbance levels that may have impacts on any archaeology, the fact that there is ample documentary information for some of the former buildings (such as photos and plans) so any archaeological evidence is limited in its research potential, the use of the site was for storage and was not residential so the archaeological record is expected to be limited, or that any remains would be minor or insubstantial, as would be the case for mains attached latrines or very small structures. Only PAD F and G have the potential to contain archaeological remains of local significance.



Figure 9 Recorded areas of archaeological potential (Artefact Heritage 2015).

Table 9 Areas of Archaeological Potential (Artefact Heritage 2015)

PAD	Description	Nature of archaeological remains	Disturbance	Archaeological Potential	Research Potential	Likelihood to meet the threshold for Local Archaeological significance?
A	The former structure in PAD A first appears on the 1958 plan (as Building 78) of the DNSDC site. The function of the structure has not been identified through documentary research. Its small footprint suggests that it is an ancillary or administrative structure. Located directly west of modern Building 1, a road way has been constructed over the location of the former structure	Footings, wood or steel structural remains and evidence of cut and fill	Moderate	Low	Low	No
B	The 1944 DNSDC plan identifies the former structure at PAD B as a latrine (Building 47) associated with a WWII warehouse. The latrine was located in the undeveloped area between WWII storehouses 7 and 9.	Structural remains Accidentally deposited artefacts or rubbish if drop toilets were installed	Low	Low	Low	No
C	PAD C is identified by the 1944 DNSDC plan as a former latrine (Building 47) associated with a WWII warehouse. The latrine was located in the undeveloped area between WWII storehouses 7 and 9.	Structural remains Accidentally deposited artefacts or rubbish if drop toilets were installed	Low	Low	Low	No

PAD	Description	Nature of archaeological remains	Disturbance	Archaeological Potential	Research Potential	Likelihood to meet the threshold for Local Archaeological significance?
D	The former structure at PAD D is identified on the 1966 DNSDC plan (Building 54) in association with two WWII timber post and beam store houses. No functional information for this feature was identified. However, its location and size appears comparable to that of PADs B and C and it is interpreted as a former latrine.	Structural remains Accidentally deposited artefacts or rubbish if drop toilets were installed	Low	Low	Low	No
E	The large former structure at PAD E is identified as Building 12 on the 1944 and 1966 plans of the DNSDC site. This former structure was a WWII timber post and beam store building (Brooks and Associates 2002; 14). It was demolished c.1990 and replaced by modern Building 16.	Footings, wood or steel structural remains and evidence of cut and fill	High	Low	Low	No
F	The eight former structures at this PAD are identified on all WWII DNSDC plans (Buildings 67, 69, 70, 72, 73, 74, 82, 83). No information relating to the function of these structures was available. The small footprint of all structures suggests these structures may be ancillary or administrative buildings.	Footings, wood or steel structural remains and evidence of cut and fill	Low	High	Moderate	Yes

PAD	Description	Nature of archaeological remains	Disturbance	Archaeological Potential	Research Potential	Likelihood to meet the threshold for Local Archaeological significance?
G	This PAD contains two former structures, Buildings 96 and 103, identified on all WWII DNSDC plans from 1958-1981. No information regarding the function of these structures was available. The small footprint of both structures suggests these structures may be ancillary or administrative buildings.	Footings, wood or steel structural remains and evidence of cut and fill	Low	High	Moderate	Yes
H	The WWII 1970 DNSDC plan identifies this PAD as containing two small structures (Buildings 98 and 102) and a latrine (Building 101). No information regarding the function of Buildings 98 and 102 was identified. The small footprint of both structures suggests they are ancillary or administrative buildings.	Footings, wood or steel structural remains and evidence of cut and fill	Moderate	Low	Low	No
I	This PAD is identified on the 1944 DNSDC plan as an "Inflammable Store". It is also identified on the 1958 DNSDC plan as Building 26. A photograph of this former building, dated 30/01/1946, contained the caption "inflammable wares such as paints, acids and oils are stored in this shed"	Footings, wood or steel structural remains and evidence of cut and fill	Low	Moderate	Low	No

PAD	Description	Nature of archaeological remains	Disturbance	Archaeological Potential	Research Potential	Likelihood to meet the threshold for Local Archaeological significance?
J	PAD J is identified on the WWII DNSDC 1958 plan as Building 25. A photograph of this building, dated 05/08/1945, demonstrates that this structure was a warehouse of similar dimension and construction to that at PAD I	Footings, wood or steel structural remains and evidence of cut and fill.	Low	Moderate	Low	No
K	This PAD is identified as Building 63 on the WWII 1958 DNSDC plan. The function of the structure has not been identified through documentary research. Its small footprint suggests that it is an ancillary or administrative structure.	Footings, wood or steel structural remains and evidence of cut and fill.	Low	Low	Low	No
L	This PAD is situated beyond the study area for the Stage 1 SIMTA development. It is identified as Building 62 on the WWII 1958 DNSDC plan. The function of the structure has not been identified through documentary research. Its small footprint suggests at an ancillary or administrative structure.	Footings, wood or steel structural remains and evidence of cut and fill.	Moderate	Low	Low	No

PAD	Description	Nature of archaeological remains	Disturbance	Archaeological Potential	Research Potential	Likelihood to meet the threshold for Local Archaeological significance?
M	Five former ancillary structures are identified at this PAD on the 1966 DNSDC plan (Buildings 65, 66, 75 and unnumbered structures). No information regarding the function of these buildings was available. The small footprint of these structures suggest at ancillary or administrative buildings. Former structures 65, 66 and one unnumbered structure were located in the area now occupied by modern Buildings 3, 4 and 5. Structure 75 was located directly within the footprint of the current entrance to the DNSDC. The second unnumbered structure was located directly below modern Building 2.	Footings, wood or steel structural remains and evidence of cut and fill.	High	Low	Low	No
N	The footprints of three WWII store buildings were entirely subsumed by the construction of modern warehouses 16, 17 and 18 c.1990. These warehouses were identified on the 1966 DNSDC plan as stores 13, 14 and 15. They were all WWII timber post and beam store buildings (Brooks and Associates 2002; 14).	Footings, concrete slab, wood or steel structural remains and evidence of cut and fill.	High	Low	Low	No

PAD	Description	Nature of archaeological remains	Disturbance	Archaeological Potential	Research Potential	Likelihood to meet the threshold for Local Archaeological significance?
Roadways	Historic plans demonstrate that the design of the DNSDC was not altered between WWII and c.1990. Road ways often remain unchanged across time and are likely to be capped by the replacing road surface. Road way deposits in the study area have undergone little subsurface disturbance.	Archaeological remains of the road way PADs may include reinforced concrete, bitumen and tar road surfaces associated with the use and maintenance of the DNSDC.	Moderate	Moderate	Low	No
Railway Sidings	The 1967 DNSDC site plan shows several warehouses within the study linked to railway sidings. These are most likely to be present along the eastern boundary of the development.	Railway tracks, sleepers and associated track work. Portions of the railway sidings were removed when the track fell into disuse after WWII. Deposits uncovered in association to the sidings may be limited and isolated.	Moderate	Moderate	Low	No

4 ASPECTS, IMPACTS AND RISKS

SIMTA Intermodal Terminal Facility- Stage 1: Environmental Impact Statement identified the following heritage related Project risks:

- One isolated Aboriginal stone artefact (Isolated Find #1) was found within the wider MPE boundary. However, this Aboriginal object is not located within the Project site. No impacts to known Aboriginal heritage values were identified for the Project site.
- Non-Aboriginal heritage impacts include the removal of five of the twenty WWII structures, the original road and open drain alignments, possible impacts to potential archaeological material associated with former structures, impacts to underground water mains and sewerage lines dating to the 1940s, and significant impacts to the setting and context of remaining WWII-era buildings. The works will include the demolition of:
 - WWII timber and post beam store buildings 06, 10 and 11
 - WWII composite timber and steel store buildings 07 and 09
- The works also include cutting and filling within several areas identified to have non-Aboriginal archaeological potential. Only PAD F and G have the potential to contain archaeological remains of local significance and will be subject to specific management measures.

The proposed works are shown in Figure 8 and will include the demolition of structures shaded in red, removal of vegetation shown in red and the cutting/filling of the area highlighted in blue.

Conservation and/or adaptive reuse of at least one of the five WWII structures on the Project site proposed for demolition was considered, however, the WWII structures are not suitable for use within the context of the SIMTA Project as they would need to have major conversions to meet safety and engineering requirements to enable them to service the required functions as part of the SIMTA Project. It is not considered appropriate to move any of the structures off site for conservation as a number of similar structures are still standing within the remainder of the SIMTA site.

4.1 Construction Risk Assessment

Impacts directly related to the Project are described in Table 10, Table 11 and the aspects and impacts register in the CEMP. Management measures to address these identified risks are included in Section 5.

Table 10 Aboriginal Heritage – Aspects, Impacts and Risks

Activity	Aspect/s	Impact/s
Construction of operational areas including a primary and secondary container loading/unloading areas and holding areas	Excavation, vibration, cutting and filling, construction of buildings	Finding/disturbance to and/or destruction of unexpected burials, human remains or other Aboriginal objects.
Construction of administration area	Excavation, vibration, cutting and filling, construction of buildings	Finding/disturbance to and/or destruction of unexpected burials, human remains or other Aboriginal objects.
Installation of rail sidings through the SIMTA site	Excavation, removal of topsoil, installation of sidings	Finding/disturbance to and/or destruction of unexpected burials, human remains or other Aboriginal objects.
Installation of signals, signs and lights	Excavation, vibration and soil compaction due to use of heavy machinery, cutting and filling.	Finding/disturbance to and/or destruction of unexpected burials, human remains or other Aboriginal objects.
Removal of vegetation from the construction area and along the full length of the Project boundary.	Excavation, vibration and soil compaction due to use of heavy machinery, cutting and filling.	Finding/disturbance to and/or destruction of unexpected burials, human remains or other Aboriginal objects.
Landscaping including a setback along Moorebank Avenue and the planting of mixed tree and understory plants and the installation of fencing on all boundaries of the Project	Excavation, vibration and soil compaction due to the use of heavy machinery, cutting and filling, installation of fencing	Finding/disturbance to and/or destruction of unexpected burials, human remains or other Aboriginal objects.
Installation of drainage lines and extension of utilities services	Excavation, vibration and soil compaction due to the use of heavy machinery, cutting and filling, installation of fencing	Finding/disturbance to and/or destruction of unexpected burials, human remains or other Aboriginal objects.

Table 11 Non-Aboriginal Heritage – Aspects, Impacts and Risks

Activity	Aspect/s	Impact/s
Cutting and filling	Excavation, vibration, cutting and filling, construction of buildings	Disturbance to and/or destruction of non-Aboriginal archaeological deposits.
Demolition of Buildings	Removal of structures, vibration	Demolition of buildings of heritage significance
Construction of operational areas including a primary and secondary container loading/unloading areas and holding areas	Excavation, vibration, cutting and filling, construction of buildings	Finding/disturbance to and/or destruction of unexpected non-Aboriginal heritage items.
Construction of Administration area	Excavation, vibration, cutting and filling, construction of buildings	Finding/disturbance to and/or destruction of unexpected non-Aboriginal heritage items.
Installation of rail sidings through the Project	Excavation, removal of topsoil, installation of sidings	Finding/disturbance to and/or destruction of unexpected non-Aboriginal heritage items.
Installation of signals, signs and lights	Excavation, vibration and soil compaction due to use of heavy machinery, cutting and filling.	Finding/disturbance to and/or destruction of unexpected non-Aboriginal heritage items.
Removal of vegetation from the Construction area and along the full length of the SIMTA site boundary.	Excavation, vibration and soil compaction due to use of heavy machinery, cutting and filling.	Finding/disturbance to and/or destruction of unexpected non-Aboriginal heritage items.
Landscaping including a setback along Moorebank avenue and the planting of mixed tree and understory plants and the installation of fencing on all boundaries of the Project	Excavation, vibration and soil compaction due to the use of heavy machinery, cutting and filling, installation of fencing	Finding/disturbance to and/or destruction of unexpected non-Aboriginal heritage items.
Installation of drainage lines and extension of utilities services	Excavation, vibration and soil compaction due to the use of heavy machinery, cutting and filling, installation of fencing	Finding/disturbance to and/or destruction of unexpected non-Aboriginal heritage items.
Demolition of building 16 via access track adjacent to building 13	Movement of heavy vehicles and close proximity of demolition to heritage item	Structural damage to building 13.

Note: The Noise and Vibration Assessment noted that any ground vibrations arising due to construction activities would be unnoticeable at nearby receivers, including existing buildings within the Project site not to be removed during Stage 1, and significantly below the relevant guideline criteria for human comfort and structural damage (Wilkinson Murray 2015:30). The maintenance of safe work distances is the only vibration mitigation measure applied in Table 12 below.

5 MANAGEMENT MEASURES

Table 12 describes the overall approach and principles associated with Heritage Management during the Project. The management measures are based on the mitigation measures compiled from the relevant requirements of the Project Approval (EIS, Submissions Report and Minister's Conditions of Consent (CoC)) as well as the SIMTA requirements and standards.

Table 12 Heritage Management Measures

Item	Action	Timing	Responsibility	Reference
Staff Awareness				
HM1	<p>All site staff, including subcontractors must attend an induction which details heritage sites and project requirements. Heritage sites will be further communicated in toolbox talks, prestart briefings and prior to works in or adjacent to heritage areas.</p> <p>Content will include site identification, materials likely to be uncovered, and requirement to notify the Environmental Manager in the event that any potential object of archaeological or cultural origin is uncovered.</p> <p>Personnel directly involved in implementing heritage control measures on site will be given specific training in the various measures to be implemented.</p> <p>Records of all training are to be filed in accordance with the project filing system.</p>	Pre-construction	All staff	<p>FCMM 9B</p> <p>CoC E34i) d)</p> <p>CoC E34 ii) f)</p>
Site Planning				
HM2	A full photographic record of the entire Project must be undertaken prior to construction commencing to record the setting and context of the site as a whole prior to any impact on collective significance	Prior to construction	Principal	FCMM10A
HM3	Archival recordings shall be completed for all heritage listed structures on the site prior to the commencement of construction.	Prior to construction	Environment Manager and Heritage consultant	CoC C13
HM4	<p>The preparation of a Heritage Interpretation Strategy will be undertaken by SIMTA in consultation with the NSW Heritage Division and approved by the Secretary prior to the commencement of construction activities affecting the WWII store buildings. However, prior to demolition of any structures, the heritage interpretation specialist must attend site with the contractor and SIMTA to detail what elements of the structures must be retained and how these must be cared for prior to installation for heritage interpretation.</p> <p><i>Note that this is a separate document to this CHMP.</i></p>	Prior to construction	Principal	<p>CoC C14</p> <p>FCMM10B</p>
HM5	Plan construction activities to ensure that they remain within the construction boundary as identified in Figure 1. Where activities may need to extend beyond the site boundary, additional heritage investigations will be undertaken to identify and manage any additional	Prior to construction	Project Director Construction Manager	<p>FCMM 9C</p> <p>CoC E12</p>

Item	Action	Timing	Responsibility	Reference
	heritage items that may occur in these areas and to ensure that these items are not harmed, modified or damaged in any way.		Environment Manager	
HM6	Environmental control maps will be developed clearly identifying Aboriginal and non-Aboriginal heritage sites on and in close proximity to the Project.	Prior to construction	Environment Manager	FCMM 9C CoC E12
HM7	A Significant Element Salvage Strategy will be prepared by the heritage specialist, in consultation with appropriate experts where necessary, including materials engineers, conservators and structural engineers, to identify appropriate elements for salvage, storage, and potential reuse at the site, and provide a methodology for safely undertaking the salvage prior to the commencement of the demolition works. A final schedule of salvaged elements will be prepared following the completion of demolition. The salvaged elements will be incorporated into the detailed design for the site's interpretation.	Prior to commencement of salvage of heritage structures	Principal	NSW Heritage Council Request
Exclusion Zones and Monitoring				
HM8	High visibility protective fencing will be Installed around Aboriginal stone artefact sites and non-Aboriginal heritage structures within proximity to the construction works under the guidance of an appropriately qualified heritage consultant.	Prior to construction	Site Supervisor, Heritage Consultant, Environment Manager	
HM9	<p>Archaeological monitoring will be undertaken for a representative sample of the sites (PADs F and G (to the south, and south west of Building No. 11, respectively) of former structures which have been assessed as having the potential to have local heritage significance.</p> <p>An archaeological monitoring plan (AMP) will be developed prior to the commencement of the construction works. The AMP will be developed in accordance with this Plan and submitted to the Department of the Environment and Energy for information prior to commencement of construction. Monitoring of these sites will be directed by an Excavation Director experienced in investigations of locally significant archaeology. Suitable experience and qualifications are outlined by the Heritage Councils <i>Criteria for the assessment of Excavation Directors</i>.</p> <p>The archaeologist would assess the likely significance of any archaeological deposits encountered, and provide advice regarding appropriate further action.</p>	Prior to or during construction	Environment Manager and Heritage Consultant	FCMM 10C
HM10	No access through fenced heritage sites. These are considered exclusion zones.	All times	All staff	Best Practice

Item	Action	Timing	Responsibility	Reference
HM11	No works outside the Project construction boundary.	All times	All staff	RSoC 2.0
HM12	Environment Manager to undertake weekly inspections and monitoring of construction activities to ensure compliance and conformance with the requirements of CoCs and this plan. Site supervisor to undertake daily inspections and undertake maintenance of fencing where required. Records of inspections will be maintained.	Daily/Weekly	Environment Manager and Site Supervisor	CoC E34ii) d)
HM13	<p>Vibration monitoring will be undertaken at non-Aboriginal heritage sites in close proximity to specific works which are not to be removed as part of the Project.</p> <p>As outlined in the Construction Noise and Vibration Management Plan (CNVMP), impacts to heritage structures are not expected (refer the Noise and Vibration Impact Assessment (NVIA) completed for the project and Section 5.2.2 of the CNVMP), such that detailed options for any alteration of construction methodology will be evaluated and implemented on a case-by-case basis and if specific circumstances arise that deem it necessary.</p> <p>If vibratory activities are deemed to occur in the vicinity of a heritage structure the safe work distances presented in Table 25 of the CNVMP will be used as a preliminary guide but evaluated and refined to ensure compliance with the DIN4150-3 limits specified in Table 16 and Figure 6 of the CNVMP. Vibratory monitoring will be undertaken as summarised above to ensure levels are measured during the actual activity and compliance achieved. It is reiterated that the sensitivity of a heritage structure can vary and the applicable DIN 4150-3 limits (refer commercial, residential or sensitive structures in Table 16 and Figure 6 of the CNVMP) will be established when planning the works and evaluating potential impacts. The sensitive structures criteria may not apply to all heritage structures.</p> <p>Where vibration goals have been exceeded, works will cease and alternative construction methodologies will be investigated. Alternative construction methodologies will be dependent upon the cause of vibration. Examples include:</p> <ul style="list-style-type: none"> • Static rolling rather than vibratory rolling • Reducing intensity of vibration • Use of alternative equipment such as multi-tyred rollers, pad-foot rollers, munchers rather than pneumatic drills or reducing size of equipment • Selection of materials which require less compaction. <p>These options will be implemented where reasonable and feasible.</p>	Ongoing during construction	Environment Manager and Site Supervisor	CoC E34ii) b)

Item	Action	Timing	Responsibility	Reference
HM14	Safe working distances between the retained buildings and machinery as outlined in Section 7.1.2 of the Construction Noise and Vibration Management Plan (CNVMP) will be maintained. These safe working distances are defined for both cosmetic damage (BS 7385) and human comfort (the NSW Vibration Guideline).	Ongoing during construction	Site Supervisor	CoC E34 ii) b)
HM15	Archaeological surveys directed by a qualified archaeologist will be undertaken for any construction area not included within the Project. Additional management measures will be prepared in consultation with stakeholders if required. If historical archaeological resources and relics are identified in areas outside of the project site, additional approvals under the Heritage Act 1977 may be required.	During construction	Environment Manager	RSoC 2.0 and Heritage Council of NSW request
HM16	Exclusion fencing (6 ft temporary fencing) is to be installed around Building 13 during construction where vehicles will pass by either side, to ensure this Building is protected and maintained during construction.	During Construction	Environmental Manager	IMEX AA-003
Procedures for Unexpected Finds				
HM17	<p>If an item (or suspected item) of heritage is discovered, the <i>Unexpected Heritage Finds Procedure</i> will be implemented (Section 5.1). All work in the area of the find will cease immediately, the heritage value of the find will be assessed including a determination as to whether the impacts are consistent with those identified within the EIS, mitigation measures will be developed to minimise the impacts, and additional approvals, where required, will be obtained. Works will not recommence until the above has been undertaken by the project archaeologist. The Principal will be notified and determine a course of action.</p> <p>If the find is an aboriginal find, registration in the OEH's Aboriginal Heritage Information Management System (AHIMS) register may be required in consultation with the OEH and Aboriginal stakeholders.</p> <p>For non-Aboriginal finds, consultation with the OEH, NSW Heritage Council and the Secretary will be required.</p>	Ongoing during construction	All staff	CoC E34i) b) CoC E34i) e) CoC E34ii) e)
HM18	If human remains are encountered works in the vicinity must cease immediately. The Secretary, NSW Police, OEH and Aboriginal Stakeholders must be notified (Section 5.1). Works will not recommence until authorised by OEH and/or NSW Police.	Ongoing during construction	All staff	CoC E34i) c)
Incident Management				

Item	Action	Timing	Responsibility	Reference
HM19	Incidents include breach of an exclusion zone, damage to artefact, or unexpected find. All incidents must be notified to the environment teams immediately. Works in the vicinity of the incident will be stopped as per the unexpected finds procedure.	Ongoing during construction	All staff	Best Practice
Reports and Records				
HM20	Meeting minutes will be kept for meetings with regulatory bodies such as the ER, EPA and OEH.	Ongoing during construction	Environment Manager	Best Practice
HM21	A summary of compliance with this procedure will be provided in the Project Monthly Report	Ongoing during construction	Environment Manager	Best Practice
Post-Construction Works				
HM22	Undertake a reassessment of the heritage value of the site upon completion of the works in consultation with Liverpool City Council and the Heritage Council of NSW.	Post-construction	Principal	Heritage Council of NSW request

5.1 Unexpected Finds Procedure (Aboriginal Heritage)

Given the extensive historical disturbance within the Project site, it is considered that the likelihood of the presence of intact or significant Aboriginal objects and/or sites is low and no further archaeological investigations are warranted in these remaining areas. However, if any Aboriginal heritage objects, as protected under NSW legislation, are uncovered during the works, then the following steps should be followed. Reporting of newly discovered sites must be prepared in accordance with statutory requirements and best practice professional standards.

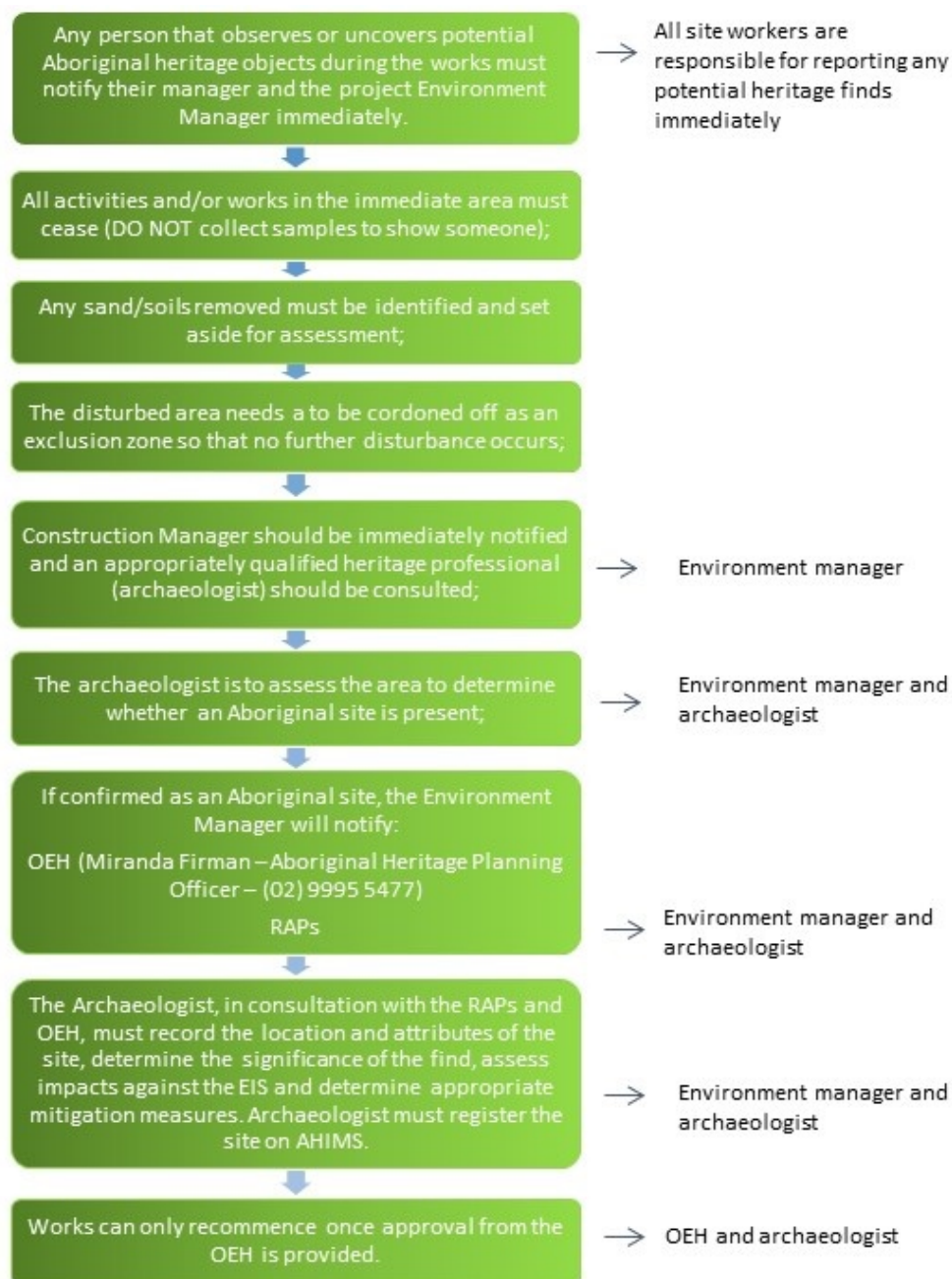


Figure 10 Unexpected Finds Procedure (Aboriginal Heritage)

5.1.1 Examples of Potential Unexpected Aboriginal Finds

It is highly unlikely that any Aboriginal artefacts will be identified on the site due to the historical disturbance of the area. However, the most likely finds are isolated finds such as flaked stone tools.

Typical characteristics of flaked stone tools include:

- Sharp edges.
 - Retouch along one or more edges.
 - Stone rich in silica.
 - Stone type often different to the natural rock in the area.
- Flakes
 - Usually less than 50 mm long.
 - A 'striking platform' visible.
 - Impact point often present on the striking platform.
 - A 'bulb of percussion' often present below the striking platform.
 - May have been shaped into a recognisable tool form, such as a point or scraper.
- Cores
- May be fist-sized or smaller.
- May have one or more scars where flakes have been removed.

It is noted that not all features can be seen on each stone tool and some require an experienced eye to identify them. Breakage can remove key features.

5.1.2 Skeletal Remains

In the event of the discovery of human skeletal material (or suspected human skeletal material) during Project activities the following steps would be followed:

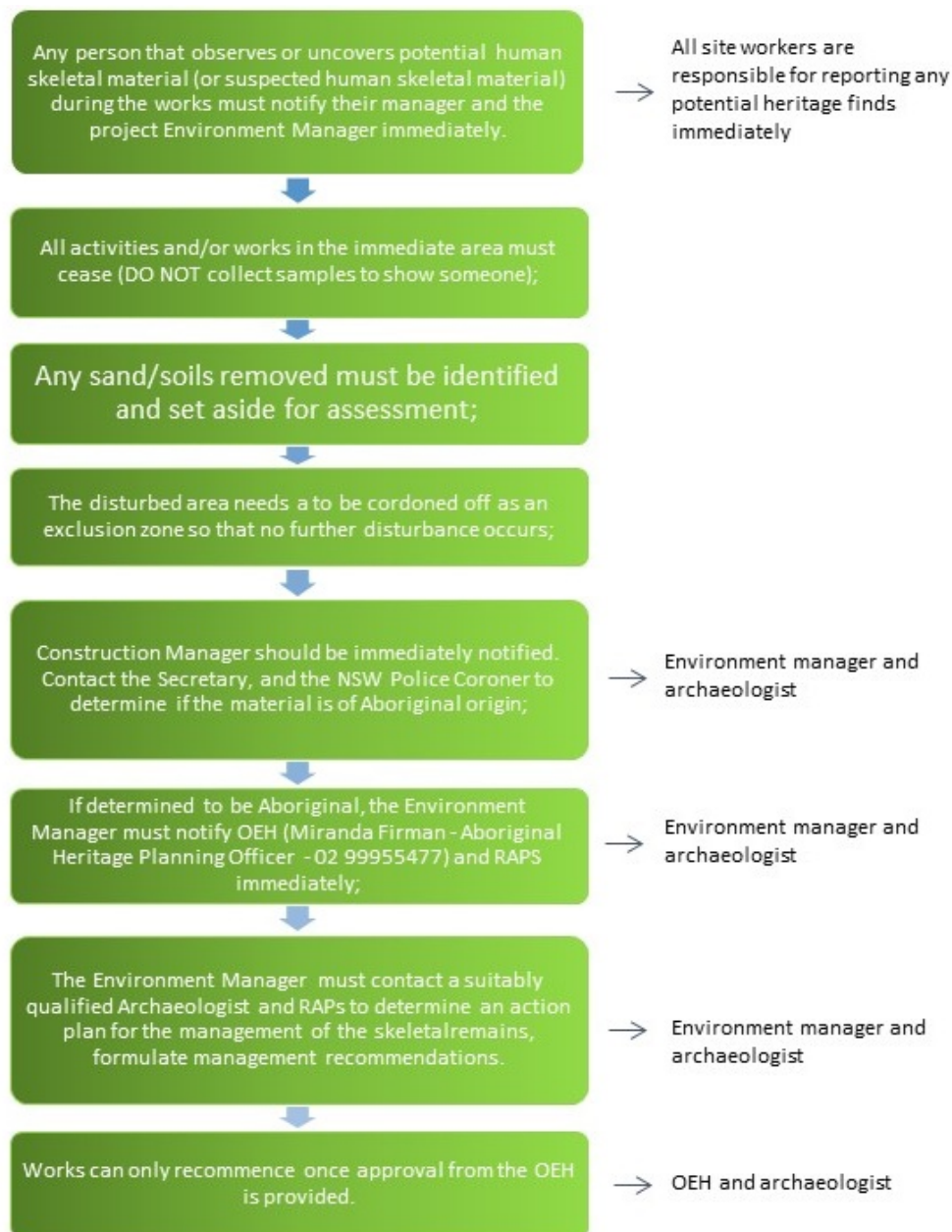


Figure 11 Unexpected Finds Procedure (skeletal material)

5.2 Unexpected Finds Procedure (Non-Aboriginal Heritage)

If unexpected finds are located during works, the non-Aboriginal Unexpected Finds Procedure will be implemented.

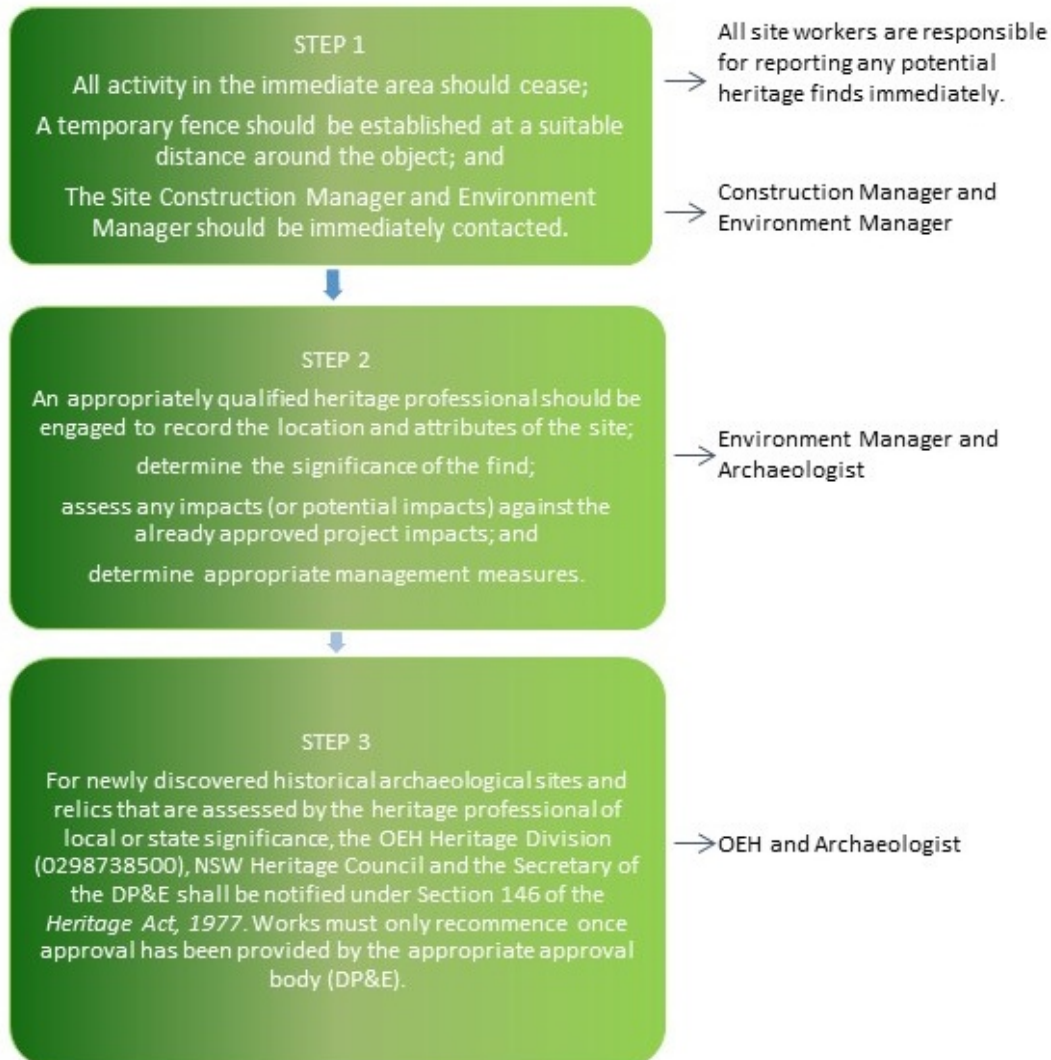


Figure 12 Unexpected Finds Procedure (Non-Aboriginal Heritage)

Note: In the context of this CHMP, an unexpected find is defined as a previously unknown heritage item or evidence of heritage value. It does not include uncovering footings within PADs identified in Table 9 as having low research potential as these have already been captured within the development approval process and no further assessment of these items is required as they are unlikely to meet the threshold for local significance. Any footings that are uncovered outside of the PADs will need to be assessed as described above.

5.2.1 Examples of Potential Unexpected Non-Aboriginal Finds

Due to previous disturbance of the site, it is highly unlikely that any non-Aboriginal artefacts will be identified during the works. However, isolated finds may be uncovered and may include:

- Discarded personal items

- Footings of unrecorded structures
- Concrete slabs.

The below provides examples of what has been found to date during heritage salvage excavations on Moorebank Precinct West.

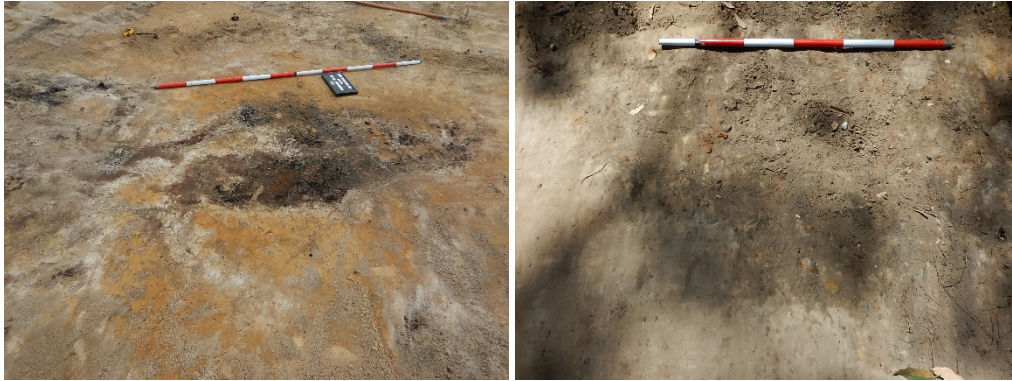


Figure 13 Rubbish pit



Figure 14 Brick pit



Figure 15 Post hole

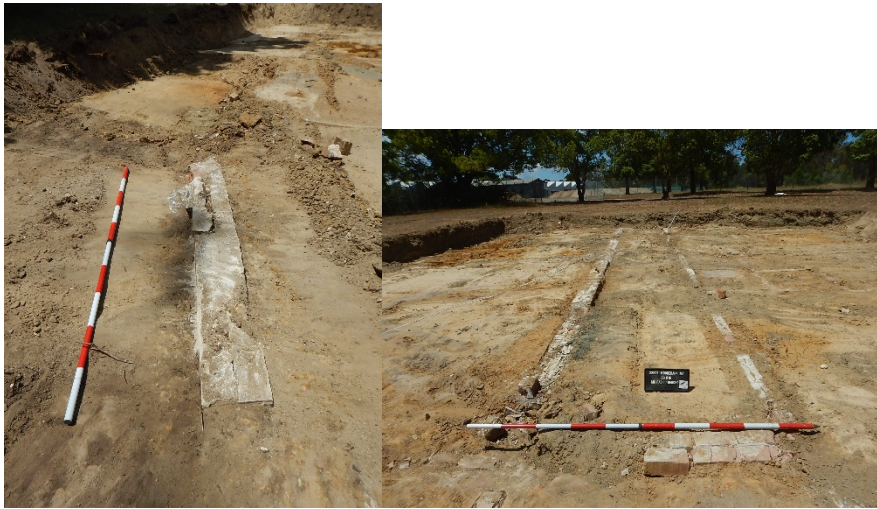


Figure 16 Foundation

5.3 Heritage Awareness Training

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

A cultural awareness training programme will be undertaken for all personnel involved with ground breaking activities for the Project will include the following:

- Information on the Aboriginal archaeological and cultural heritage values of the Project area
- Awareness of their obligations to minimise impacts to non-Aboriginal heritage under the *Heritage Act 1977*
- Outline of the location and type of archaeological sites within the Project area including instructions not to disturb these sites
- Provide clear information about statutory obligations for heritage NSW *National Parks and Wildlife Act 1974* (NPW Act). It is important to note that failure to report a discovery and those responsible for the damage or destruction occasioned by unauthorised removal or alteration to a site or to archaeological material may be prosecuted under the NPW Act (as amended)
- Information on historic heritage sites and 'relics' and information about statutory obligations under the NSW Heritage Act 1977
- Provide training on how to identify stone artefacts and other Aboriginal heritage sites
- Stop works and reporting protocols for discovery of previously unknown heritage and archaeological items
- The training/induction package must be prepared and delivered in consultation with Aboriginal stakeholder groups
- Examples of Aboriginal and non-Aboriginal items that may be expected on the site

All training and tool box meetings will be recorded. All project documentation, including environmental compliance, conformance and training records, will be kept as objective evidence of compliance and conformance with environmental requirements and filed in accordance with the Project filing system.

5.4 Ongoing Consultation

Ongoing consultation will be undertaken with Registered Aboriginal Parties (RAPs), in particular Tharawal Local Aboriginal Land Council, throughout construction as follows:

- Where changes to the Project may have implications for Aboriginal heritage management; or
- Where there is a significant discovery in the course of site preparation or construction e.g. Aboriginal ancestral remains or archaeological features.

Urgent issues requiring the attention of RAPs will be communicated no later than one week of the issue arising.

Feedback requested from the RAPs should be received within two weeks and no later than four weeks from the date correspondence is issued.

The appropriate address and format for responses shall be provided as part of the request. Where no response is issued within this timeframe, a follow-up phone call will be made by the Environment Advisor to close out the outstanding request.

The effectiveness and value of the consultation process will be periodically reviewed internally based on past consultation and feedback from the RAPs.

6 COMPLIANCE MANAGEMENT

6.1 Roles and Responsibilities

Relevant roles and responsibilities associated with this CHMP are presented in Table 13. All personnel are responsible for ensuring that heritage items are protected.

It is important to note that failure to report a discovery and those responsible for the damage or destruction occasioned by unauthorised removal or alteration to a site or to archaeological material may be prosecuted under the NP&W Act (as amended).

Table 13 Contractors Roles and Responsibilities

Roles	Responsibilities
Construction Manager	<p>Ensure that sufficient resources are allocated for the implementation of this CHMP</p> <p>Ensure that the CEMP covers the management and mitigation measures presented in this CHMP</p> <p>Ensure that the outcomes of the visual checks/ compliance and conformance construction monitoring/ incident reporting are systematically evaluated as part of ongoing management of construction activities</p> <p>Ensure audits of construction site records/ monitoring records/ incident reports are undertaken on a monthly basis, findings are shared with relevant site personnel and corrective actions are implemented</p> <p>Authorise all monitoring reports and any revisions to this CHMP</p>
Environment Manager	<p>Oversee the overall implementation of this CHMP</p> <p>Ensure all relevant personnel have and understand the most up-to-date copy of this CHMP</p> <p>Ensure that any required actions arising from the detection of unexpected heritage items or if clearing is required outside of the approved Stage 1 development footprint are reported to the relevant personnel for further action and ensure that the actions are effectively implemented</p> <p>Ensure all monitoring reporting requirements are met and maintained on site</p>
Site supervisors contractors/subcontractors	<p>Understand and implement mitigation protocols as required in the CHMP and any other required measures during construction</p> <p>Undertake relevant training to implement the requirements of this CHMP</p> <p>All personnel are responsible for ensuring that the clearing limits are addressed and heritage items are protected.</p> <p>All site personnel to undertake toolbox talks in relation to the reporting process for unexpected finds.</p>
Qualified heritage professional (archaeologist)	<p>The archaeologist will be responsible for providing advice to minimise potential impacts to any Aboriginal or historic heritage values that may be recorded during the construction activities.</p>

6.2 Monitoring, Auditing and Reporting

Monitoring, auditing and reporting will be undertaken in accordance with the CEMP, as well as additional requirements listed below.

The Environment Manager will undertake weekly inspections and monitoring of construction activities to ensure effectiveness of controls, compliance and conformance with the requirements of the CoC and this plan.

Items that require action will be documented on the site environmental inspection. The Construction Manager will be responsible for providing appropriate resources in terms of labour, plant and equipment to enable the items to be rectified in the nominated timeframes.

Daily inspections of controls will be made by Supervisors and maintenance will be recorded in site diaries during active site works.

6.3 Non-compliances, Non-conformances and Actions

It is the responsibility of all site personnel to report non-compliances and non-conformances to the Site Supervisor and/or the Contractor's EM.

Non-compliances, non-conformances and corrective and preventative actions will be managed in accordance with Section 9.2.1 of the CEMP.

6.4 Review and Improvement

Continuous improvement of this plan will be achieved by the ongoing evaluation of environmental management performance against regulatory environmental policies, legislative requirements, SIMTA's Environmental Policy, Project objectives and targets for the purpose of identifying opportunities for improvement.

The continuous improvement process will be designed to:

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

Any revisions to the CHMP will be in accordance with the process outlined in Section 3.1 of the CEMP. A copy of the updated plan and changes will be distributed to all relevant stakeholders in accordance with the approved document control procedure.

This plan will be reviewed annually as a minimum but may be updated more regularly depending on process changes and refinements or where an incident related to heritage manage requires the plan to be reviewed.

6.5 Enquiries, Complaints and Incident Management

Environmental incidents and complaints are to be investigated, documented, actioned and closed out as per the details provided in the Community Communication Strategy and the CEMP.

7 REFERENCES

AHMS (2012a) **Aboriginal Cultural Heritage Assessment: SIMTA Moorebank Intermodal Terminal Facility**. Unpublished Report for Hyder Consulting Pty Ltd.

AHMS (2015) **SIMTA Intermodal Terminal Facility – Stage 1 - Aboriginal Heritage Impact Assessment**. Report to Hyder Consulting Pty Ltd.

AHMS (2012b) **Indigenous Biodiversity Values Assessment: Sydney Intermodal Terminal, Moorebank, NSW**. Unpublished Report for Hyder Consulting Pty Ltd.

Artefact Heritage (2012) **Non-Indigenous Heritage Assessment: SIMTA Part 3A Concept Plan Application**

Artefact Heritage (2015) **SIMTA Intermodal Terminal Facility – Stage 1 – Non-Indigenous Heritage Assessment**. Report to Hyder Consulting Pty Ltd.

Australian Heritage Database (<http://www.environment.gov.au/cgi-bin/ahdb/search.pl>) entry: “Defence National Storage and Distribution Centre”

Brooks and Associates (2002) **Heritage Assessment: Defence National Storage Distribution Centre** (DNSDC) Moorebank Defence Site, Moorebank

SIMTA Intermodal Terminal Facility - Stage 1 - Noise and Vibration Impact Assessment, prepared by Wilkinson Murray on behalf of Hyder Consulting Pty Ltd, dated May 2015 (NVIA)

APPENDIX A

Stakeholder Consultation

Email comment from OEH dated 16/2/17

From: [REDACTED]
Sent: Thursday, 16 February 2017 3:29 PM
To: [REDACTED]
Subject: RE: CEMP Doc Review: MPE Stage 1 (IMEX) [REDACTED]

Please find below OEH's comments on revision V2 of the *Construction Flora and Fauna Management Plan - Moorebank Precinct East Stage 1, Package 2*. Sincere apologies for the delay in providing these.

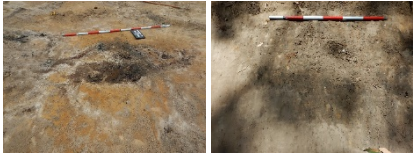

In relation to the Environmental and **Heritage Construction Management Plans**, I advise that OEH is unable to provide comments due to other priorities. Regards

[REDACTED]
 Conservation Planning Officer Greater
 Sydney Region Regional Operations
 Group

Office of Environment and Heritage T: [REDACTED]
 [REDACTED]

Addressing additional comments from Heritage Council of NSW dated 8/3/17

Heritage Council of NSW Comment	SIMTA Response
The revised mitigation measure HM4 is supported on the basis that an Interpretation Strategy has since been prepared to guide interpretation at the site	No response required
It is, therefore, recommended that the following additional mitigation measure is included in the CHMP: <i>"A Significant Element Salvage Strategy will be prepared by the heritage specialist, under the direction of appropriate experts, including materials engineers, conservators and structural engineers, to identify appropriate elements for salvage, storage, and potential reuse at the site, and provide a methodology for safely undertaking the salvage prior to the commencement of the demolition works. A final schedule of salvaged elements will be prepared following the completion of demolition. The salvaged elements will be incorporated into the detailed design for the site's interpretation."</i>	A new HM7 has been included as follows: A Significant Element Salvage Strategy will be prepared by the heritage specialist, in consultation with appropriate experts where necessary, including materials engineers, conservators and structural engineers, to identify appropriate elements for salvage, storage, and potential reuse at the site, and provide a methodology for safely undertaking the salvage prior to the commencement of the demolition works. A final schedule of salvaged elements will be prepared following the completion of demolition. The salvaged elements will be incorporated into the detailed design for the site's interpretation.
The Heritage Council had previously requested that the CHMP include a requirement to reassess the heritage significance of the site following the works, in consultation with Liverpool City Council and the Heritage Council. The intention of this request was to update the current heritage listing on the LEP to reflect its diminished significance. Notwithstanding the major heritage impacts of the development, the proponent's statement that the site will have "no heritage	HM21 has been included as a mitigation measure: <i>"Undertake a reassessment of the heritage value of the site upon completion of the works in consultation with Liverpool City Council and the Heritage Council of NSW."</i>

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<p>value” after the works are complete is not considered acceptable. The site is likely to continue to possess a significant history and meaning to the local and broader community, which must be appropriately acknowledged.</p>	
<p>The Heritage Council had previously noted that areas outside the project area may require additional approvals if archaeological information is identified in these areas, including applications under the <i>Heritage Act 1977</i>. The proponent has since amended mitigation measure HM15. The intention of the revised measure is supported, however, it should be reworded as follows:</p> <p><i>“Archaeological surveys directed by a qualified archaeologist will be undertaken for any construction area not included within the Project. Additional management measures will be prepared in consultation with stakeholders if required. If historical archaeological resources and relics are identified in areas outside of the project site, additional approvals under the Heritage Act 1977 may be required.”</i></p>	<p><i>Wording amended as follows:</i></p> <p><i>“Archaeological surveys directed by a qualified archaeologist will be undertaken for any construction area not included within the Project. Additional management measures will be prepared in consultation with stakeholders if required. If historical archaeological resources and relics are identified in areas outside of the project site, additional approvals under the Heritage Act 1977 may be required.”</i></p>
<p>The Heritage Council recommended that the unexpected finds process for non-Aboriginal heritage be updated to include:</p> <p><i>a) the need to notify the Heritage Council of unexpected relics through a s.146 notification.</i></p> <p><i>b) and to update the unexpected finds procedure in Step 3 from Aboriginal, to non-Aboriginal heritage and this procedure clearly identifies through photographs and text information relevant to understanding what may artefacts may be likely to be relics and may be found.</i></p> <p>The proposed amendments to point a) and b) are supported in principle, however it is recommended that they be reworded as follows:</p> <p><i>a) For newly discovered historical archaeological sites and relics that are assessed by the heritage professional of local or state significance, the OEH Heritage Division (02 9873 8500), NSW Heritage Council and the Secretary of the Department of Planning and Environment shall be notified under Section 146 of the Heritage Act 1977. Works must only recommence once approval has been provided by the appropriate approval body (The Department of Planning and Environment).</i></p> <p><i>b) To address the Heritage Council’s previous comments, the ‘unexpected finds procedure’ in Step 3 needs to focus on historical archaeological unexpected finds for the project area, not Aboriginal objects. This should be supported by photographs and</i></p>	<p>a) amended as requested.</p> <p>b) the following has been included for non-Aboriginal heritage to help site staff identify potential unexpected finds.</p> <h3>Examples of Potential Unexpected Non-Aboriginal Finds</h3> <p>Due to previous disturbance of the site, it is highly unlikely that any non-Aboriginal artefacts will be identified during the works. However, isolated finds may be uncovered and may include:</p> <ul style="list-style-type: none"> Discarded personal items Footings of unrecorded structures Concrete slabs. <p>The below provides examples of what has been found to date during heritage salvage excavations on Moorebank Precinct West.</p> <div data-bbox="676 1615 1090 1767">  </div> <p><i>Figure 17 Rubbish pit</i></p> <div data-bbox="676 1836 880 1989">  </div> <p><i>Figure 18 Brick pit</i></p>

Heritage Council of NSW Comment

text. This will ensure construction personnel are able to identify these elements.

SIMTA Response



Figure 19 Post hole



Figure 20 Foundation

Original Response to Heritage Council of NSW dated 21/2/17

Heritage Council of NSW Comment	SIMTA Response
<p>To partially mitigate these impacts, the Non-Indigenous Heritage Assessment recommends <i>“if WWII buildings within the SIMTA site are to be demolished, re-use of heritage fabric within an interpretive context would be appropriate and archival recording would be necessary.”</i> It is understood that C13 of the approval requires the preparation of archival recordings, and C14 requires a Heritage Interpretation Strategy, prepared in consultation with the Heritage Division. Mitigation measure HM4 of the CHMP requires the preparation of a Heritage Interpretation Strategy, however no specific requirements for that strategy are provided. Given the extent of impact proposed, it is strongly recommended that the CHMP is revised to provide specific requirements to enable meaningful heritage interpretation at the site.</p>	<p>HM3 and HM4 have been included as pre-construction requirements. The archival recording was completed on 18-19 January 2017 by Artefact Heritage Consultants. The archival record is currently in preparation.</p> <p>A Heritage Interpretation Strategy has been prepared and submitted to the Heritage Council for review and comment on 20/2/17. The HIS is intended to inform and guide planning for heritage interpretation of the site by identifying historical themes relevant to the site, and outlining strategies for presenting these through a variety of interpretive media. The HIS is the first stage in the interpretation planning process. The next two stages are</p> <ul style="list-style-type: none"> • Developing a Heritage Interpretation Plan (HIP), including content development and design, and • Implementation of the HIP. <p>As an overview, the HIS includes for the following interpretative media:</p> <ol style="list-style-type: none"> 1. Interpretative panels 2. Interpretative artefact displays 3. Paving inlays 4. Adaptive re-use of architectural elements 5. Offsite website <p>It is not intended to include details of heritage interpretation into the CHMP as the HIS is a standalone document. However, HM4 has been amended to include the following:</p> <p><i>“The preparation of a Heritage Interpretation Strategy will be undertaken by SIMTA in consultation with the NSW Heritage Division and approved by the Secretary prior to the commencement of construction activities affecting the WWII store buildings. However, prior to demolition of any structures, the heritage interpretation specialist must attend site with the contractor and SIMTA to detail what elements of the structures must be retained and how these must be cared for prior to installation for heritage interpretation.”</i></p>
<p>It is noted that impacts to the heritage significance of DNSDC will be such that the site may no longer possess heritage value after the works are completed. Notwithstanding, mitigation measures should aim to retain its remaining heritage values as much as possible. Mitigation measures should therefore include a requirement to explore innovative ways to interpret the former defence site as part its new use. If it is not appropriate to physically interpret or reuse the removed buildings on site, a salvage strategy should be prepared to ensure that significant fabric is carefully removed and reused for interpretive purposes and/or appropriately stored. It is also recommended that measures are included to protect the surviving heritage elements at the site during the works.</p>	<p>Please see above comment. The Heritage Interpretation Strategy includes detail of interpretative themes and strategies to preserve the site. These will be further developed in the next stages of heritage interpretation.</p> <p>Mitigation measure HM7 outlines the requirements of r high-visibility exclusion fencing to be installed prior to the commencement of works:</p> <p><i>“High visibility protective fencing will be Installed around Aboriginal stone artefact sites and non-Aboriginal heritage structures within proximity to the construction works under the guidance of an appropriately qualified heritage consultant.”</i></p>
<p>The CHMP should also include a requirement to reassess the heritage significance of the site</p>	<p>It is noted that there will be no heritage values remaining on the site once the MPE stage 2 proposal commences. As such, it is not</p>

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<p>following the works, in consultation with Liverpool City Council and the Heritage Council. This will enable the heritage values of site to be appropriately managed into the future.</p>	<p>deemed appropriate or practical to undertake a reassessment of the heritage significance of the MPE stage 1 site at the completion of construction.</p>
<p>It is noted that archaeological surveys are proposed (measure HM14) in areas not included in the Project. The proponent is reminded that areas outside the Project area may require additional approvals if archaeological information is identified in these areas. This could include applications under the Heritage Act 1977. This section should be updated to clearly identify these potential additional requirements.</p>	<p>HM14 text has been revised to read:</p> <p><i>“Archaeological surveys directed by a qualified archaeologist will be undertaken for any construction area not included within the Project. Additional management measures will be prepared in consultation with stakeholders if required. If archaeological information is identified in these areas, additional approvals, including applications under the Heritage Act 1977 may be required.”</i></p>
<p>The unexpected finds process for non-Aboriginal heritage (p.40) should be updated to clearly include the need to notify the Heritage Council of unexpected relics through a s.146 notification and to update the reference in Step 3 from Aboriginal, to non-Aboriginal heritage. It is also recommended that the unexpected finds procedure clearly identifies, through photographs and text the likely unexpected finds for the project area to ensure construction personnel are clearly able to identify these elements.</p>	<p>Step 3 has been amended as follows:</p> <p>“STEP 3</p> <ul style="list-style-type: none"> • <i>For newly discovered sites that are assessed by the heritage professional to be of State Significance, the OEH Heritage Division (02 9873 8500), NSW Heritage Council and the Secretary would also be notified.</i> • <i>If any unexpected relic is identified, the NSW Heritage Council will be notified through a section 146 notification.</i> • <i>Works can only recommence once approval has been provided by the appropriate approval body.”</i> <p>Two additional sections have been included as follows:</p> <p>5.2.1 Examples of Potential Unexpected Aboriginal Finds</p> <p>It is highly unlikely that any Aboriginal artefacts will be identified on the site due to the historical disturbance of the area. However, the most likely finds are isolated finds such as flaked stone tools.</p> <p>Typical characteristics of flaked stone tools include:</p> <ul style="list-style-type: none"> • Sharp edges. <ul style="list-style-type: none"> ○ Retouch along one or more edges. ○ Stone rich in silica. ○ Stone type often different to the natural rock in the area. • Flakes <ul style="list-style-type: none"> ○ Usually less than 50 mm long. ○ A ‘striking platform’ visible. ○ Impact point often present on the striking platform. ○ A ‘bulb of percussion’ often present below the striking platform. ○ May have been shaped into a recognisable tool form, such as a point or scraper. • Cores • May be fist-sized or smaller. • May have one or more scars where flakes have been removed. <p>It is noted that not all features can be seen on each stone tool and some require an experienced eye to identify them. Breakage can remove key features.</p> <p>5.2.2 Examples of Potential Unexpected Non-Aboriginal Finds</p>

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	<p><i>Due to previous disturbance of the site, it is highly unlikely that any non-Aboriginal artefacts will be identified on the site. However isolated finds may be uncovered and may include:</i></p> <ul style="list-style-type: none"> <i>Discarded personal items</i> <i>Footings of unrecorded structures</i> <i>Concrete slabs.</i>