

Southern Sydney Freight Line Construction Environmental Management Plan - Built Heritage Sub Plan

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1. Introduction

The Built Heritage Sub-Plan forms part of the Construction Environmental Management Plan (CEMP) for the Southern Sydney Freight Line (SSFL) project.

This Sub-Plan has been developed in response to condition numbers 72, 73 and 74 of the Minister's Conditions of Approval. These conditions are discussed in detail in potential impacts, mitigation measures and monitoring and reporting.

Condition number 72 requires the proponent to *"prepare a Built Heritage Management Sub Plan (BHMSPP), in consultation with DoP (Heritage Branch) and Relevant Councils in accordance with the Statements of Commitments as part of the CEMP. The BHMSPP must include:*

- (a) details of any investigations to be undertaken and any approvals required;*
- (b) procedures to be implemented if previously unidentified historical relics are discovered during Construction. If such relics are discovered, all work likely to affect the relic(s) will cease immediately and the Heritage Council will be notified in accordance with the Heritage Act 1977; and*
- (c) an education program for Construction Work Site personnel on their obligation for historic relics and heritage items.*
- (d) an interpretation strategy in accordance with the Interpreting Heritage Places and Items Guidelines (2005), which should incorporate the results of any historical archaeological investigations undertaken as part of the Project; and*
- (e) details for minimising impacts to heritage items including:
 - i designing all replacement structures having regard to heritage considerations; and*
 - ii appropriate landscaping strategies."**

Condition number 73 states:

As part of the BHMSPP, the Proponent is to undertake a Historical Archaeological Assessment (HAA) and Statement of Heritage Impact (SOHI) of the Early Liverpool Town Centre between Memorial Avenue and the intersection of Elizabeth Street and the rail corridor as identified in the Liverpool Archaeological Zoning and Management Plan (1996). The HAA is to be prepared in accordance with the Heritage Office and Urban Affairs and Planning Archaeological Assessment Guidelines (1996). The SOHI shall be prepared (in accordance with the Heritage Office revised 2002 guidelines) to assess the potential impacts of the Project to the archaeological resource.

Subject to the findings of the HAA and SOHI (where impacts to the potential archaeological resource have been identified), the Proponent shall ensure that an Archaeological excavation methodology and Research Design is prepared with consideration to the Department of Planning's Excavation Directors Assessment Criteria.

All documents and information required shall be prepared for the Department of Planning's (Heritage Office) review and the Director-General's approval prior to the commencement of excavation activities within the area of historical archaeological potential identified in the HAA. The Proponent will undertake

Construction in accordance with any findings of the HAA and SOI and requirements issued by the Director-General.

Condition number 74 states:

Prior to the commencement of Construction (or as otherwise agreed to by the Director-General), the Proponent must prepare an archival and photographic record of any identified heritage item that is likely to be either directly or indirectly impacted by the Construction of the Project and lodge copies of the archival and photographic record with Relevant Council libraries, RailCorp and DoP (Heritage Office).

1.1 Purpose and objectives

This Construction Environmental Management Sub Plan summarises the legislative requirements and the mitigation measures required to minimise impacts to built heritage during construction of the SSFL.

The key objectives of the Built Heritage Sub Plan are to:

- Manage built heritage items, artefacts and historical relics that might be impacted by the construction of the SSFL with due diligence and in accordance with the requirements of the *NSW Heritage Act 1977* as amended
- Ensure items of built heritage and artefacts are not damaged, and historical relics are not disturbed during pre-construction, construction and post-construction phases of the project.
- Ensure that stakeholders including the Heritage Branch of the DoP, RailCorp and local Councils are kept informed on strategies for management of heritage items and action being taken to minimise heritage impacts.
- Provide a linkage to the Urban Design and Landscape Plan to clearly identify its relationship to this Heritage sub plan with respect to appropriate landscaping strategies.

1.2 Work description

Details of the construction activities and work packages for the SSFL Project are included in the Master CEMP. Figure 1-1, Figure 1-2, and Figure 1-3 provide the location of built heritage items that will be modified or potentially affected by the works.

Figure 1-1a Location of work areas and location of heritage items modified or potentially affected by the SSFL works

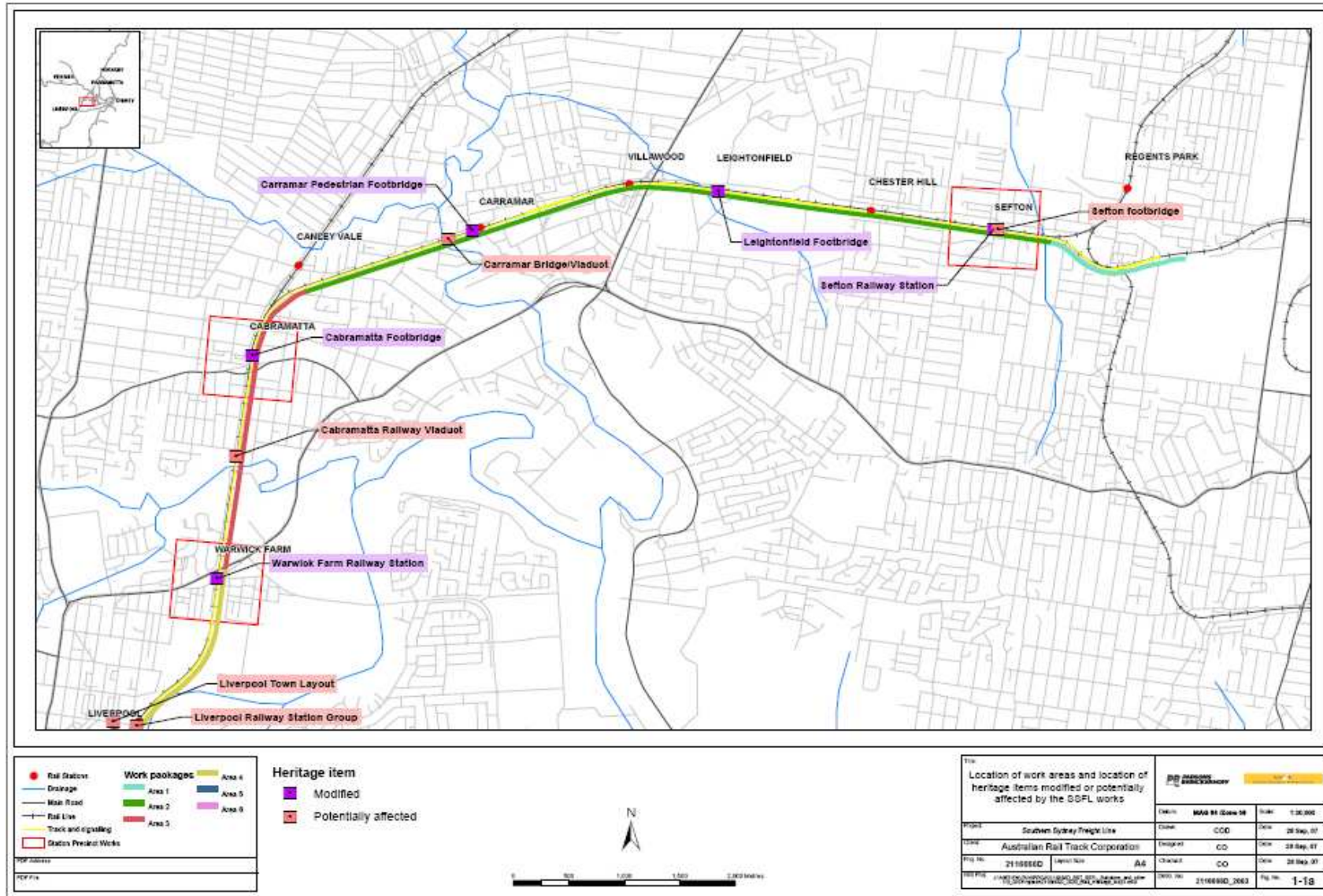
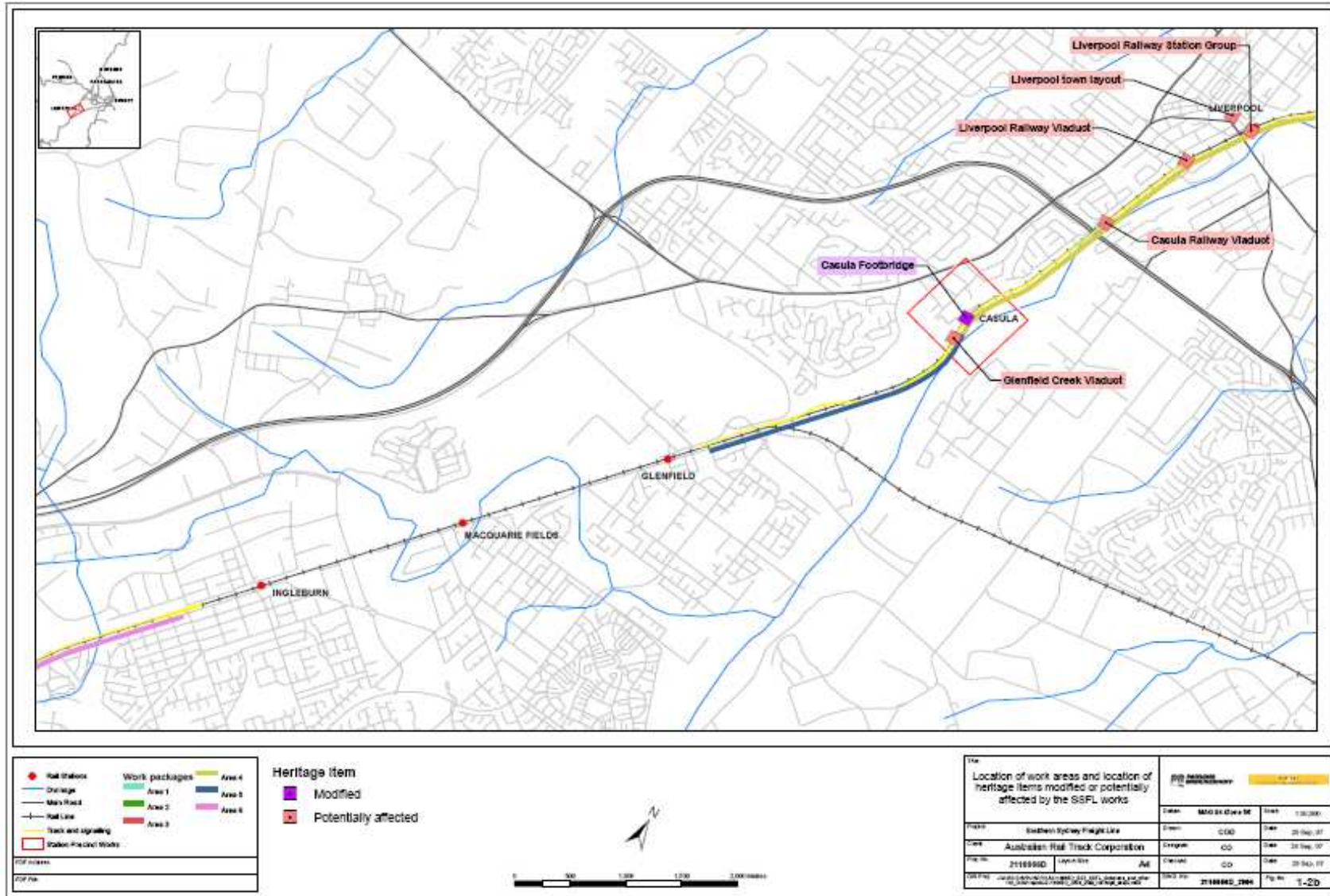


Figure 1-2b Location of work areas and location of heritage items modified or potentially affected by the SSFL works



1.3 Existing heritage and site specific issues

A search of built heritage registers during the environmental assessment identified a number of built heritage items which will be modified by the SSFL works, these items are summarised in Table 1-2 and identified in Figures 1.1a, 1.1b and 1.1c. The search is the result of consultation between the NSW Heritage Office; conducted by an ARTC sub consultant, RailCorp through their Heritage Department and Councils that the SSFL trackway will traverse.

Table 1-1: Items of built heritage modified by the construction of the SSFL

Heritage Item	Heritage Listing	Level of Significance	Location / Work Package	Construction works likely to affect item
Campbelltown Railway Station	RailCorp S170: State Heritage Register	State significance	Campbelltown/ST7	Upgrading of footbridge
Minto Footbridge	RailCorp S170	Local significance	Minto Railway Station/ST5	Existing footbridge ramp and stairs removed, and replaced by new stairs and lifts. Existing buildings on footbridge removed and replaced with new buildings
Casula Footbridge	RailCorp S170	Local significance	Casula Railway Station/ST4	Extend existing footbridge to cross SSFL, and provide new stairs to eastern side of railway corridor
Warwick Farm Railway Station	RailCorp S170	Local significance	Warwick Farm/ST3	Existing passenger waiting shelter on south bound platform demolished New footbridge provided over SSFL to gain access to south bound platform
Cabramatta Footbridge	RailCorp S170	Local significance	Cabramatta / ST2	Station buildings (not heritage listed) on south bound platform removed with new facilities provided elsewhere Existing footbridge extended across SSFL, remove existing stairs and

				provide new stairs to replace.
Carramar Pedestrian Footbridge	RailCorp S170	Local significance	Located Fourth Avenue Canley Vale / BR4	Remove existing stairs, extend footbridge at southern end over SSFL, and provide new stairs
Leightonfield Footbridge	RailCorp S170	State significance	Leightonfield / BR1	Provide new span and new pier on southern side to carry bridge over SSFL
Sefton Railway Station	RailCorp S170	Local significance	Sefton / ST1	Impacts restricted to access to railway station from Wellington Road; see footbridge in table 1-3

The environmental assessment also identified a number of built heritage items that could potentially be affected by the SSFL works through construction works occurring adjacent to or in close proximity to heritage items. These items are summarised in Table 1-3 and shown on Figures 1-1a, b and c.

Table 1-2: Items of built heritage potentially affected by the construction of the SSFL

Heritage Item	Heritage Listing	Level of Significance	Location/ Relevant work package	Construction works likely to affect item
Liverpool Railway Viaduct	Liverpool City Council LEP	Local significance	Located Mill Rd/Shepherd Rd Liverpool / Area 4	Eastern elevation (vista) of viaduct impacted
Liverpool Railway Station Group	RailCorp S170 Liverpool City Council LEP State Heritage Register	State significance	Liverpool railway/ Area 4	Potential for archaeological deposits in area between station and Georges River
Cabramatta Railway Viaduct	Fairfield Council LEP	Local significance	Located off Railway Parade /Track and Signalling	Eastern elevation (vista) of viaduct impacted
Carramar Bridge/Viaduct	Fairfield City Council LEP	Local significance	Located off Sandal Crescent Carramar /BR2 / Area 3	May require removal of footbridge attached to original truss structure; southern elevation (vista) of truss bridge impacted
Sefton station footbridge	RailCorp S170	Local significance	Sefton / ST1/ Area 2	Remove existing stairway access to Wellington Road, extend footbridge over SSFL, and install new stairs to Wellington Road
Glenfield Creek Viaduct	Campbelltown City Council LEP	Local significance	Located south of Casula / Track and Signalling	Eastern elevation (vista) of viaduct impacted
Former Narellan Road level crossing		Local significance	Track and Signalling/ Area 6	Relics (section of asphalt roadway) within railway corridor
Formation of former Campbelltown to Camden rail line		Local significance	Track and Signalling/ Area 6	Formation of section of former railway line within railway corridor
Casula Railway Viaduct	Campbelltown City Council LEP	Local significance	Located off Woodbrook Road / Track and Signalling	Eastern elevation (vista) of viaduct impacted
Liverpool town layout	Liverpool Council LEP	State Significance	Between Scott Street & Hume Highway / Shepherd Rd Liverpool/ Area 4	May impact on general station and streetscape.

1.4 Summary of built heritage investigations

ARTC has completed a number of studies on built heritage for the SSFL project. These reports are as follows:

- ARTC (2008) SSFL Urban Design and Landscape Plan. Sydney NSW.
- Caldis Cook Group (2005) Built Heritage Assessment for the Southern Sydney Freight Line Chippendale NSW.
- Casey & Lowe Pty Ltd, Archaeology & Heritage, Marrickville NSW (2006) Archaeological Assessment Southern Sydney Freight Line – Liverpool Section for Australian Rail Track Corporation
- Casey & Lowe Pty Ltd, Results of Investigation – Mounted Police Barracks Site, South Sydney Freight Line, Liverpool (October 2008) for Australian Rail Track Corporation

The results of these built heritage studies created a more complete image and value of the historical components that occur along the SSFL project corridor. The studies directly influenced the report's performance criteria, potential impacts, management and mitigation measures and the monitoring and reporting sections.

ARTC is about to commence a further project to prepare archival and photographic records of all heritage buildings and structures impacted by the construction of the SSFL, as well as two specific sites at Campbelltown (the former Narellan Road level crossing, and any evidence of the former Campbelltown to Camden railway line). Copies of the archival recordings will be provided to local Councils as well as the Heritage Branch of the Department of Planning.

This project will also develop an Interpretive Strategy. The Strategy will be developed in consultation with RailCorp and progress in tandem as individual sections of the SSFL project proceed.

1.4.1 **ARTC (2008) SSFL Urban Design and Landscape Plan. Sydney NSW.**

Under Section 2: Locality Profiles & Built Heritage Impacts of the Urban Design and Landscape Plan, mitigation measures have been outlined which minimise negative impacts on heritage items within and near the railway corridor. The section discusses built heritage aspects of each of the local government areas in which the historical relics reside.

1.4.2 **Caldis Cook Group (2005) Built Heritage Assessment for the Southern Sydney Freight Line Chippendale NSW.**

This report was prepared by Caldis Cook Group Pty Ltd for Parsons Brinckerhoff to document all buildings townscapes and sites of significant European Heritage value in the vicinity of the proposed SSFL, as collated from various agencies and bodies.

The study boundary is determined by the proposed SSFL which would begin south of Macarthur and end past Sefton Park Junction. The proposed alignment would be mostly within the existing RailCorp corridor. The first section of the Built Heritage Assessment describes the methodology and regulatory constraints in relation to the heritage items. The second section contains a brief background history of the local government areas, railway history, and assessments of the affected built heritage items. Impacts of the proposal are also assessed and recommendations are made to mitigate the impacts. Generally, the recommendations for the affected heritage items include the provision of protection measures during construction, documenting the works undertaken at all stages, and providing a photographic record of the works. The assessment concludes that the heritage impacts of the proposal would be manageable. The final section contains a listing of all the built heritage items within the study area.

1.4.3 Casey & Lowe Pty Ltd, Archaeology & Heritage(2006) Archaeological Assessment Southern Sydney Freight Line – Liverpool Section for Australian Rail Track Corporation.

This assessment indicated that:

- Remains of buildings, structures and deposits associated with the Mounted Police Barracks and hospital may be found in the eastern half of the railway corridor, and may be impacted by the proposed works. The remains may include footings of buildings, as well as other features and structures and deposits of artefacts.
- These remains are considered to be of a high level of archaeological significance at a Local level, although well-preserved, extensive remains could be considered to be of State heritage significance.

1.4.4 Casey and Lowe Pty Ltd, Results of Investigation – Mounted Police Barracks Site, South Sydney Freight Line, Liverpool (October 2008) for Australian Rail Track Corporation

Following approval from the Heritage Branch of the NSW Department of Planning to undertake test excavations in accordance with a defined methodology around the presumed site of the former Mounted Police Barracks and other associated buildings at Liverpool, site work was undertaken on Thursday 31 July and Friday 1 August 2008.

Three test excavations were dug to a maximum depth of 3m with no remains associated with the Mounted Police Barracks being found. The archaeologist reported that past impacts associated with the railway have probably led to significant disturbance and substantive remains were not expected to have survived.

During the test excavations, a brick drain which is thought to have dated back to the first decades of the Town of Liverpool (ie pre-1860) was located. The section of drain identified would represent a small part of what is likely to extend further west towards Liverpool CBD under the existing RailCorp tracks. The archaeologist assessed that the drain would have a moderate level of significance at a Local level.

The archaeologist recommended that the brick drain should be preserved intact if this is feasible; ARTC is currently considering options to carry the proposed SSFL track on a short bridge over the drain allowing it to remain undisturbed.

The archaeologist also recommended that if the drain will be impacted by the proposed works, ie bridging over cannot reasonably be achieved, then the section that will be under the

SSFL and which will be affected should be exposed and recorded prior to civil works commencing. The bricks should be offered to Liverpool Council (or similar) to assist with their building conservation works.

ARTC is pursuing the archaeologist's recommendations.

1.5 Historical relics

ARTC intends to deliver an awareness program for Construction Site personnel on their obligations for management of both heritage assets and historical relics.

In the event historical relic(s) are discovered during construction, the following actions will be undertaken:

1. All work within the vicinity of or likely to affect the relic(s) will cease immediately.
2. ARTC's Heritage Officer will be contacted to assess the relics and arrange notification to the Heritage Branch of the Department of Planning in accordance with the Heritage Act 1977.
3. Work will only re-commence following consultations and any necessary approvals from the Heritage Branch, with site instructions being subsequently issued by the onsite Environmental Manager.

1.6 Interpretation strategy

The interpretation strategy for the SSFL project will be developed based on NSW Heritage Office, Interpreting Heritage Places and Items Guidelines (2005), and in consultation with RailCorp..

ARTC has engaged a heritage consultant to develop an interpretation strategy to mitigate impacts on RailCorp buildings and structures impacted by the construction of the SSFL.

The methodology for development of the strategy is –

- 1 Review of technical design papers (appendices to the Environmental Assessment) to understand the work involved and likely impacts.
- 2 Review of Caldis Cook Report (text and photographs) on impacts on heritage listed assets
- 3 Site inspections to understand local conditions, the relationship of the asset to the local environment including visibility, community involvement and commuter use of the heritage asset, and to understand the extent of visible alterations and modifications and determine what degree of interpretation is required.
- 4 Historical investigations of the items impacted to confirm the degree of interpretation required.
- 5 Consultation with RailCorp as owner of the assets to confirm the interpretation strategy for each place is acceptable.
- 6 Submission of the overall strategy approach and proposal for each place to the Heritage Branch for endorsement.

In the event of the discovery of other significant historical relics during construction, ARTC will consult with the NSW Heritage Office on the need for and development of appropriate historical interpretation signage.

2. Legislative requirements and guidelines

Current environmental legislation (including regulations) applicable to the project is listed in Table 2-1.

Table 2-1: Legislative Requirements

Relevant legislation (administering authority)	Summary of legislation requirements	Approvals/Permits or licences required
<p><i>Environmental Planning and Assessment Act, 1979</i> (Department of Planning (DoP), Campbelltown, Fairfield and Liverpool City Councils)</p>	<p>Planning approval required for any significant changes or additional requirements for the project.</p>	<p>All works must be undertaken in accordance with the approvals and commitments made.</p> <p>Notify ARTC Project Manager if any significant changes to the project are required. ARTC Project Manager to identify any further environmental assessment required.</p>
<p><i>NSW Heritage Act 1977</i> (Heritage Office/ Campbelltown, Fairfield and Liverpool City Councils)</p>	<p>Protects all items of environmental heritage (natural and cultural) in New South Wales.</p> <p>Section 170 requires all NSW state agencies to keep an inventory of heritage items, which are owned by the agency.</p> <p>Heritage items included on the RailCorp Section 170 Heritage Register will be impacted by the construction of the SSFL.</p>	<p>No requirement for additional permit, approval or licence since project is approved under Part 3A <i>Environmental Planning and Assessment Act 1979</i> approval.</p> <p>RailCorp to provide 14 days prior notification of alteration, demolition or removal of any of its assets listed on the RailCorp Section 170 Heritage Register, to Heritage Branch of DoP.</p>
<p>(Commonwealth) <i>Environment Protection and Biodiversity Conservation Act, 1999</i> (Department of Environment and Water Resources)</p>	<p>The Act is triggered by developments that will have a significant impact on Matters of National Environmental Significance including items of outstanding heritage value to Australia.</p> <p>The Act requires approvals to be sought by a commonwealth agency for any act which may have a significant impact on the environment.</p> <p>The SSFL will not materially affect any National Heritage Places or Commonwealth Heritage Places or items on the Register of National Estate.</p>	<p>ARTC is a commonwealth agency under this Act.</p> <p>Commonwealth approval is not required as none of the built heritage places or assets that might be impacted are owned by or on land controlled by a Commonwealth agency.</p> <p>Commonwealth approval is being obtained due to the presence of matters of national environmental significance, threatened biodiversity listed under the EPBC Act. (refer biodiversity sub-plan)</p>

3. Performance criteria

The performance criteria for the built heritage sub plan are provided in Table 3-1.

Table 3-1: Built Heritage Environmental Objectives

Built Heritage Environmental Objectives	<ul style="list-style-type: none">▪ Manage built heritage items, artefacts and historical relics that might be impacted by the construction of the SSFL with due diligence and in accordance with the requirements of the <i>NSW Heritage Act 1977</i> as amended▪ Ensure items of built heritage and artefacts are not damaged, and historical relics are not disturbed during pre-construction, construction and post-construction phases of the project.
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4. Potential impacts

Construction activities associated with the project have the potential to impact built heritage. The environmental aspects associated with these activities and their potential impacts are summarised in Table 4.1.

As defined in ISO 14001, an environmental aspect is “an element of an organisation’s activities or products or services that can interact with the environment” (SAI Global, 2004).

Environmental aspects within this project are specific actions or items that could cause an impact.

Table 4-1: Potential built heritage impacts

Environmental aspect	Heritage impact
<ul style="list-style-type: none"> ▪ Earthworks including embankments and widening of cuttings. 	<ul style="list-style-type: none"> ▪ Alterations to, or removal of known items of historical significance. ▪ Possible damage/destruction to unknown items of historical significance.
<ul style="list-style-type: none"> ▪ Modification of station buildings and access to accommodate space for SSFL track, OHS and disability requirements. 	<ul style="list-style-type: none"> ▪ Alteration of heritage items to accommodate modifications. ▪ Possible damage/destruction to known items of historical significance.
<ul style="list-style-type: none"> ▪ Relocation or modification of drainage structures, track widening and laying, culverts and retaining walls/ embankment construction. 	<ul style="list-style-type: none"> ▪ Possible damage/destruction to unknown items of historical significance.
<ul style="list-style-type: none"> ▪ Construction of new bridges and modification to existing footbridges and road bridges 	<ul style="list-style-type: none"> ▪ Alteration of heritage items to accommodate modifications, and/or visual impacts on existing heritage structures as a result of new bridges and other structures being erected ▪ Possible damage/destruction to unknown items of historical significance.

5. Mitigation measures

This section outlines management measures and mitigation strategies to be undertaken as far as practicable to mitigate the potential impacts as they relate to pre-construction, construction and post-construction phases of the project.

Table 5-1: Mitigation Measures

Mitigation measures	Responsibility	Relevant Work Area	Source of requirement
Pre-construction			
<ul style="list-style-type: none"> ▪ An interpretation strategy prepared in accordance with the <i>Interpreting Heritage Places and Items Guidelines</i> (2005). This strategy will include the results of any historical archaeological investigations undertaken; outlined in section 5.1. 	ARTC Project Manager	All areas	CoA72 d
<ul style="list-style-type: none"> ▪ Any historical structures that will need to be removed will have the replacing structure designed to take into consideration heritage influences. This is presented in the Urban Design Landscaping Plan. 	ARTC Project Manager	All areas	CoA72 e i
<ul style="list-style-type: none"> ▪ Landscape strategies will be developed that complement the built heritage of the location. Landscape strategies and activities will be designed in such a way as to not be detrimental to built heritage. This is presented in the Urban Design Landscaping Plan. 	ARTC Project Manager	All areas	CoA72 e ii
<ul style="list-style-type: none"> ▪ Construction personnel will be provided with the following information as part of their site induction: <ul style="list-style-type: none"> ▶ Location of built heritage items relevant to their activities ▶ Education program on what to do in the event of a unidentified item of built heritage value being discovered. This will be conducted at the site induction meeting. ▶ Recognition of previously unidentified items of built heritage, and appropriate procedures including notifications and works to cease 	Contractor Project Manager	All areas	CoA72
<ul style="list-style-type: none"> ▪ An Historical Archaeological Assessment (HAA) of the Early Liverpool Town Centre between Memorial Avenue and the intersection of Elizabeth Street and the rail corridor will be undertaken prior to works commencing in that area. 	ARTC Project Manager	Area 4	CoA 73
<ul style="list-style-type: none"> ▪ A Statement of Heritage Impact (SoHI) will be prepared to assess the potential impacts of the SSFL on the Early Liverpool Town Centre between Memorial Avenue and the intersection of 			

Mitigation measures	Responsibility	Relevant Work Area	Source of requirement
Elizabeth Street and the rail corridor.			
<ul style="list-style-type: none"> ▪ The HAA and SoHI will be submitted to DoP for review and approval before commencing archaeological excavation activities in this area. 			
<ul style="list-style-type: none"> ▪ An archaeological excavation methodology will be prepared which will include testing prior to construction works at the location of remains associated with the Mounted Police Barracks and the hospital. 	ARTC Environment Manager	Area 4	CoA 73 and HAA
<ul style="list-style-type: none"> ▪ Archaeological testing will be completed in accordance with the excavation methodology. ▪ If substantive archaeological remains are present, an archaeological recording program will be completed to record the remains. ▪ Any artefacts recovered from the site will be catalogued and a report completed in accordance with Heritage Office requirements. 			
<ul style="list-style-type: none"> ▪ A photographic and archival record of all directly or indirectly affected heritage items (as detailed in Table 1.2 and 1.3) will be prepared in accordance with the <i>Guidelines for photographic recording of heritage items, NSW Heritage Office</i> prior to commencement of construction activities in these areas. ▪ The photographic and archival record, including negatives, prints, contact sheets, catalogue sheets and digital copies will be submitted to relevant Council libraries, RailCorp and DoP (heritage Office). 	ARTC Project Manager	All areas	SoC34 & SoC74
<ul style="list-style-type: none"> ▪ Consultation with RailCorp will be undertaken to determine the feasibility of designing the new rail bridges at the indirectly impacted viaducts which are identified in Section 2.6 of Technical Paper 3 of the Environmental Assessment. 	ARTC Project Manager	All areas	SoC35
<ul style="list-style-type: none"> ▪ Details for minimising impacts to heritage items including design of replacement structures and appropriate landscaping strategies are presented in the Urban Design and Landscaping Plan. This plan will be consulted when undertaking works to these structures. 	ARTC Project Manager	All areas	CoA72 e i and ii)
<ul style="list-style-type: none"> ▪ Structural additions will be designed to be physically separated from the heritage ones to achieve visual separation. This is 	ARTC Project Manager	All areas	CoA72 e i and ii)

Mitigation measures	Responsibility	Relevant Work Area	Source of requirement
presented in the Urban Design and Landscaping Plan under the relevant work program the structure is located in.			
<ul style="list-style-type: none"> ▪ New pylons will be positioned to allow existing spans and newly constructed structural spans to have the same vibrating rhythm when loaded. This will be undertaken through the construction plans. 	ARTC Project Manager	All areas	SoC35c
<ul style="list-style-type: none"> ▪ A photographic record of physical evidence of the former Narellan Road level crossing and former Camden rail line within Campbelltown railway yard. ▪ Copies of the photographic record will be provided to Campbelltown municipal library. 	ARTC Project Manager	All areas	SoC36a
During construction			
<ul style="list-style-type: none"> ▪ Contractors will implement identified control measures for specific heritage items as specified in this plan. 	Contractor Project Manager	All areas	CoA72
<ul style="list-style-type: none"> ▪ If any unexpected heritage items or relics are encountered all work likely to affect the relics will cease immediately and the ARTC Heritage Officer, the EMR and Heritage Council will be notified in accordance with the <i>Heritage Act 1977</i>. ▪ Works will only recommence once instructed by the ARTC Heritage Officer, 	Construction Managers	All	SoC 32
<ul style="list-style-type: none"> ▪ Structural additions to the rail will be constructed to be structurally independent and separate to the existing historical features. 	ARTC Project Manager	All areas	SoC35a
<ul style="list-style-type: none"> ▪ Where rail construction may negatively impact on heritage items, design of all replacement structures will have regard to heritage considerations. That is: <ul style="list-style-type: none"> ▪ preservation of historical component of site, ▪ no overshadowing historical relic, ▪ be in keeping with the visual and community amenity of the site and ▪ have appropriate landscaping strategies. ▪ This is addressed in the ARTC (2008) SSFL Urban Design and Landscape Plan in section 2, Locality Profiles & Built Heritage Impacts. 	ARTC Project Manager	All areas	CoA72ei and ii)
<ul style="list-style-type: none"> ▪ An interpretation strategy will be developed in accordance with the <i>Interpreting Heritage Places and Items Guidelines</i> (2005), and will incorporate the results of any historical archaeological investigations should any 	ARTC Project Manager	All areas	CoA72

Mitigation measures	Responsibility	Relevant Work Area	Source of requirement
be unearthed.			
Post-construction			
<ul style="list-style-type: none"> ▪ An interpretation strategy for any historical relics of significance will be implemented as assessed by ARTC and NSW Heritage Office. 	ARTC Project Manager	All areas as relevant	CoA 72
<ul style="list-style-type: none"> ▪ Records regarding any works conducted in proximity to built heritage artefacts will be maintained. 	ARTC	All	SoC 32

6. Monitoring and reporting

Table 6-1: Monitoring and reporting requirements

Monitoring and reporting requirements	Responsibility	Source of requirement
Pre-construction		
<ul style="list-style-type: none"> ▪ Undertake an Historical Archaeological Assessment (HAA) and Statement of Heritage Impact (SOHI) of the Early Liverpool Town Centre between Memorial Avenue and the intersection of Elizabeth Street and the rail corridor prior to the commencement of excavation activities. 	ARTC Project Director	CoA 73
<ul style="list-style-type: none"> ▪ Prepare an archival and photographic record of any identified heritage item that is likely to be either directly or indirectly impacted by construction of the project. 	ARTC Project Director	CoA 74
Construction		
<ul style="list-style-type: none"> ▪ Report to Heritage Council any unidentified or discovered historical relics as per procedures. 	Construction Manager	CoA 72b
Post-construction		
<ul style="list-style-type: none"> ▪ Maintain records of any works conducted in proximity to cultural heritage artefacts. 	Construction Manager	Soc32

7. Corrective action

Possible non-conformances with this Sub-Plan will include non-compliance with the management measures and mitigation strategies outlined in *Section 5*.

All incidents and non-conformances are to be reported using the Non-Conformance Report Form (appended to the CEMP) and investigated and corrected in accordance with *Section 7* of the CEMP to ensure effective environmental management practices at all times.

8. Document control

This Built Heritage Sub-Plan will be reviewed regularly to ensure its relevance to the construction activities. If necessary, the Built Heritage Sub-Plan will be amended (e.g. due to changed activity), and reissued as soon as possible. All Contractors will be notified of any changes made to the Sub-Plan.