

# CONSTRUCTION HERITAGE MANAGEMENT PLAN

Moorebank Precinct East Stage 2 -  
SSD 7628



## Moorebank Intermodal Precinct – Precinct East Stage 2

SSD 7628

### Construction Heritage Management Plan

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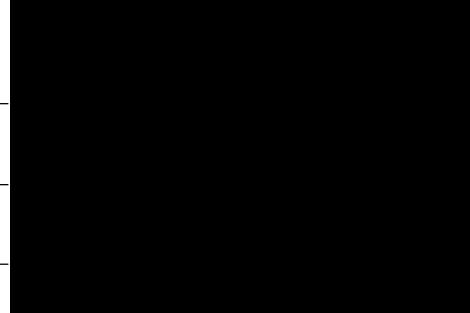
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## Revisions

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002	28/02/2018	Address ER comments
003	11/04/2018	Address consultation comments
004	19/04/2018	Addressing final ER comments
005	02/05/2018	Update in response to results of B95 report and other minor edits
006	12/06/2018	Addressing 2nd round of DP&E comments and finalisation of consultation
007	27/09/2018	Updates to reflect issue of Moorebank Precinct EPL
008	28/05/2019	Updated with MPW Commonwealth Approvals relevant to Moorebank Avenue upgrade works
009	15/07/2019	Updates to reflect DotEE comments
010	5/08/2019	Updates to reflect additional DotEE comments
011	25/10/2019	<p>Minor updates associated with:</p> <ul style="list-style-type: none"> <li>• RfMA 007 – Update to compliance and non-compliance definitions and inclusion of cumulative impacts required by EPBC CoA (2011/6029)</li> <li>• RfMA 014 – Suitable spoil importation</li> <li>• RfMA 015 – Moorebank Precinct EPL</li> <li>• RfMA 019 – Clarification of definitions for Early Works and Construction Phase A activities</li> <li>• RfMA 024 – MPW EPBC (2011/6086) and MPE EPBC (2011/9229) approval requirements for DotEE review and approval</li> </ul>
012	21/11/2019	Update to address ER comments and removal of Construction Phase A updates associated with RfMA 019
013	20/12/2019	Minor update to address ER comments associated with RfMA 019 – Clarifications of definitions for Early

Revision	Date	Description	Prepared by	Approved by
		Works and Construction Phase A activities		
014	30/10/2020	<p>Updates associated with:</p> <ul style="list-style-type: none"> <li>• RfMA-018 – MAUW boundary change</li> <li>• RfMA-028 – MAUW/MADR stockpile areas</li> <li>• SSD 7628-Mod 2 approval</li> <li>• Periodic review of management plans – Unexpected Finds Protocol (Non-Aboriginal heritage)</li> </ul>	 	 
015	19/03/2021	<p>Updates associated with:</p> <ul style="list-style-type: none"> <li>• RfMA-039 – Corrections and update to Extended Hours Works Plan, and revision to construction program</li> <li>• RfMA-040 – Additional compound for light vehicle parking and break facilities</li> <li>• SSD 7268 – MOD3</li> <li>• SSD 7628 – MOD4</li> </ul>	 	 
016	11/07/2022	<p>Updates associated with:</p> <ul style="list-style-type: none"> <li>• SSD 7628 - MOD1</li> <li>• WH 6&amp;7 amended layout</li> </ul>	 	 
017	03/12/2024	<p>Updates associated with:</p> <ul style="list-style-type: none"> <li>• SSD 7628 MOD5</li> <li>• RfMA-043 – Early works for MARW on MPE S2 Site</li> <li>• Administrative updates to reflect development status</li> </ul>	 	 

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## Acronyms and Definitions

Acronym / Term	Meaning
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.
Contractor's CM	Contractor's Construction Manager
Contractor's EM	Contractor's Environment Manager
CEMP	Construction Environmental Management Plan
CHL	Commonwealth Heritage List
CHMP	Construction Heritage Management Plan
CoCs	Conditions of Consent
Construction area / Construction footprint	Extent of construction works, namely areas to be disturbed during the construction of the Development, as identified in the MPE S2 RtS.
Contractor	Principal Contractor
Development, the	Stage 2 of the MPE Concept Approval (MP 10_0193) approved as the MPE Stage 2 Development (SSD 7628) as consolidated. It involves the construction and operation of warehousing and distribution facilities on the MPE Site and upgrades to approximately 1.5 kilometres of Moorebank Avenue.
Development site	The subject of the MPE Stage 2 EIS, the part of the MPE Site which includes all areas to be disturbed by the Development (including the operational area and construction area).
DNSDC	Defence National Storage and Distribution Centre
DP&E	Department of Planning and Environment (now DPHI)
DPHI	Department of Planning, Housing and Infrastructure (formerly DPIE)
DPIE	Department of Planning, Industry and Environment (formerly DP&E now DPHI)
DPI	NSW Department of Primary Industries
EIS	Environmental Impact Statement
EPA	NSW Environment Protection Authority
EP&A Act	Environmental Planning and Assessment Act 1979
EPBC Act	Commonwealth Environment Protection and Biodiversity Conservation Act 1999

Acronym / Term	Meaning
EPL	Environment Protection Licence
ER	Environmental Representative
EWHMP	Early Works Heritage Management Plan
FCMM	Final Compilation of Mitigation Measures
HIP	Heritage Interpretation Plan
HIS	Heritage Interpretation Strategy
ISCA	Infrastructure Sustainability Council of Australia
LALC	Local Aboriginal Land Council
Local significance	An item is important in the course or pattern of the local area's cultural or natural history.
MARW	Moorebank Avenue Realignment Works
MHG	Moorebank Heritage Group
Minister, the	NSW Minister for Planning
MPE	Moorebank Precinct East
MPE Stage 1 Development	MPE Stage 1 Development (SSD 14-6766) for the development of the Intermodal terminal facility at Moorebank. This reference also includes associated conditions of consent and environmental management measures which form part of the documentation for the approval.
MPE Stage 2 EIS	Moorebank Precinct East Stage 2 Proposal – Environmental Impact Statement publicly exhibited between 13 December 2016 and 24 February 2017.
MPE Stage 2 RtS	Moorebank Precinct East Stage 2 Proposal – Response to Submissions Report (July 2017), prepared in response to the submissions received regarding the MPE Stage 2 Proposal.
MPW	Moorebank Precinct West
NHL	National Heritage List
Non-compliance	An occurrence, set of circumstances, or development that results in a non-compliance or is non-compliant with Development Consent SSD 7628 Conditions of Consent or EPBC Act Approval (EPBC 2011/6229) Conditions of Approval but is not an incident
Non-conformance	Observations or actions that are not in strict accordance with the CEMP and the aspect specific sub-plan
OEH	Office of Environment and Heritage

Acronym / Term	Meaning
OEMP	Operational Environmental Management Plan
PAD	Potential Archaeological Deposit
RAP	Registered Aboriginal Parties
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.
RtS	Response to Submissions
SME	School of Military Engineering
SSD	State significant development
UFP	Unexpected Finds Protocol



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## 1. Background

Approval for the construction and operation of Stage 2 of the Moorebank Precinct East (MPE) Development (State significant development (SSD) 7628), operated by ESR Australia & NZ (formerly LOGOS), which comprises the second stage of development under the MPE Concept Approval (MP10\_0193) was received 31 January 2018 as consolidated.

This Construction Heritage Management Plan (CHMP) has been developed to manage impacts to heritage items and values during the construction of Stage 2 of the MPE Development (hereafter, 'the Development').

Within this plan, a strategy has been established to demonstrate the contractor's approach to the management of heritage items and values. This CHMP addresses the relevant requirements of the Development Consent, including the Environmental Impact Statement (EIS), Response to Submissions Report (RtS) and Minister's Conditions of Consent (CoCs), and all applicable guidelines and standards specific to the management of heritage during construction of the Development.

### 1.1. Development Ownership

In 2022, LOGOS joined the ESR group of companies and since August 2024, the LOGOS and ESR operations have been integrated to now operate under the name ESR Australia & NZ (ESR). The applicant/ approval holder entity remains unchanged at this stage until further notice and references to LOGOS and LOGOS authored documents and/or plans may continue and remains relevant where LOGOS and ESR are used interchangeably.

### 1.2. Introduction

The MPE Site, including the Development site, is located approximately 27km south-west of the Sydney Central Business District and approximately 26km west of Port Botany and includes the former Defence National Storage and Distribution Centre (DNSDC) site. The MPE Site is situated within the Liverpool Local Government Area, in Sydney's South West subregion, approximately 2.5km from the Liverpool City Centre.

The Development involves the development of an intermodal facility including warehouse and distribution facilities, freight village (ancillary site and operational services), stormwater, landscaping, servicing and associated works on the eastern side of Moorebank Avenue, Moorebank.

Stage 2 of the Development involves the construction and operation of warehousing and distribution facilities on the MPE Site and upgrades to approximately 2.1km of Moorebank Avenue.

Key components of the Development include:

- Earthworks including the importation of 600,000m<sup>3</sup> of fill and vegetation clearing
- Importation, stockpiling and placement of up to 250,000m<sup>3</sup> of suitable spoil (separate to the 600,000 m<sup>3</sup> of imported clean general fill permitted for bulk earthworks)
- Approximately 300,000m<sup>2</sup> gross floor area of warehousing and ancillary offices
- Warehouse fit-out

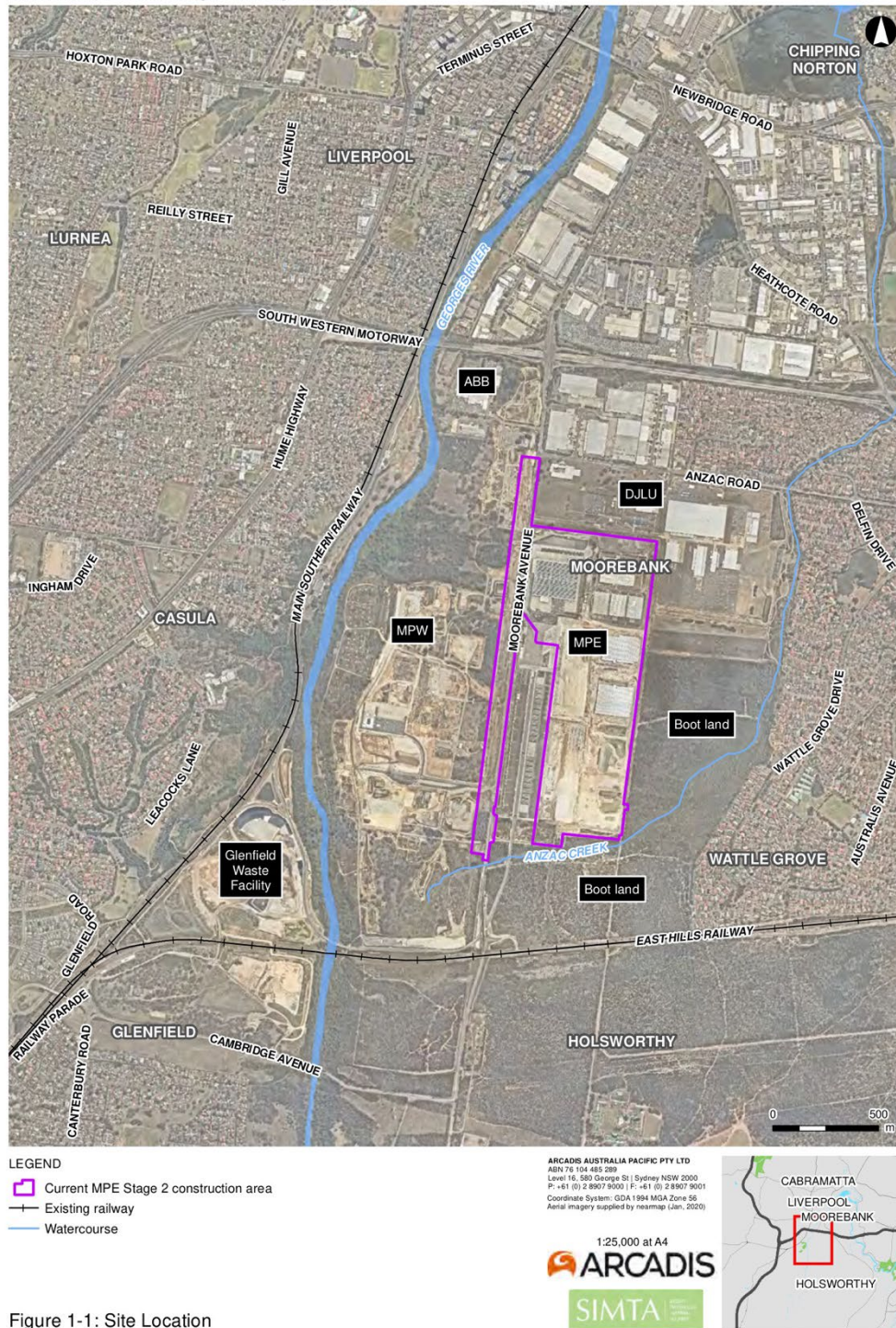
- Freight village, 8000m<sup>2</sup> gross floor area of ancillary retail, commercial and light industrial land uses
- Internal road network and hardstand across the site
- Ancillary supporting infrastructure within the site, including:
  - Stormwater, drainage and flooding infrastructure
  - Utilities relocation/installation
  - Fencing, signage, lighting, remediation and landscaping.
- Moorebank Avenue upgrade including:
  - Raising by about two metres and some widening
  - Embankments and tie-ins to existing Moorebank Avenue road levels
  - Signalling and intersection works
- Intersection upgrades along Moorebank Avenue including:
  - Moorebank Avenue/MPE Stage 2 access
  - Moorebank Avenue/MPE Stage 1 northern access
  - Moorebank Avenue/MPE Stage 2 central access
  - Moorebank Precinct West Southern Access/MPE Stage 2 southern emergency access.

The Site location is provided in Figure 1-1.

Moorebank Avenue Realignment Works (MARW) was approved by the NSW Minister for Planning on 14 October 2021 as State Significant Infrastructure (SSI-10053) (Infrastructure Approval) under Division 5.2 of the Environmental Planning and Assessment Act 1979 (EP&A Act). It is also a controlled action under Section 130(1) and 133(1) of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) and was approved by the Minister for the Environment on 7 December 2021 (EPBC Approval 2020-8839).

The footprint of MARW, which generally runs along the northern and eastern boundary of the MPE Site, interfaces and encroaches on the MPE Site. In order to allow for progression of construction works for MARW (in particular, the northern carriageway), some early preparatory works are required that are located within the MPE Site (where the project boundaries overlap). These works are undertaken under the MPE CEMP, with the MARW CEMP not being relevant to these works..

Construction Heritage Management Plan



Date: 4/03/2020 Path: \\hse-aus-nz-01\01\jobs\AA008765\L-GIS\A\_Current\B\_Maps\MPE2\MPE2\_CEMP\SIMTA\_MPE2\_CEMP\_008\_SiteOverview\_A4P\_v5.mxd  
Created by: TT  
QA by: RM

Figure 1-1 Site Location

### 1.3. Development Consent

The MPE Stage 2 Development was assessed by Department of Planning and Environment (DP&E) under Part 4, Division 4.1 (now Division 4.7 as of 1 March 2018) of the EP&A Act as SSD. The Planning Assessment Commission granted development consent for the MPE Stage 2 Development on 31 January 2018 and is subject to the Minister's CoC (ref SSD 7628). The Development has been subsequently modified. The Development, including its potential impacts, consultation and proposed mitigation and management, is documented or referenced in the following suite of documents:

- SSD consent 7628, as consolidated
- SSD partial consent (subdivision) 7628, as consolidated
- Moorebank Precinct East – Stage 2 – Environmental Impact Statement (Arcadis Australia Pacific Pty Limited, December 2016)
- MPE *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) Approval (No. 2011/6229) granted on March 2014
- Moorebank Precinct West (MPW) *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) Approval (No. 2011/6086) granted on September 2016 (for Moorebank Avenue Upgrade Works only)
- Consolidated assessment clarification responses issued on 10 November 2017.

### 1.4. Development Delivery Phase

The Development construction period is anticipated to be up to five years, which is generally divided into three works phases.

The terminology for the Development phases was developed from the preparation of the EIS and RtS documentation in response to the language of the CoCs and the need to stage the delivery of the environmental management documentation required by the CoCs. Current terminology, and the equivalent terminology from the CoC and RtS are included in Table 1-1.

Table 1-1 Development Delivery Phase Terminology

Development Delivery Phase	CoC A18 Phase Equivalent	MPE Stage 2 RtS Works Period Equivalent
Early Works	Early Works	Works Period A: Pre-construction
	Fill importation (to 60,000m <sup>3</sup> )	Works Period B: Site preparation
Construction Phase A	Fill importation	Works Period B: Site preparation
	Construction	Works Period E: Bulk earthworks, drainage and utilities
		Works Period F: Construction and internal fit out of warehousing
		Works Period G: Miscellaneous construction works

Development Delivery Phase	CoC A18 Phase Equivalent	MPE Stage 2 RtS Works Period Equivalent
Construction Phase B	Fill importation Construction	Works Period C: Construction of Moorebank Avenue Diversion Road  Works Period D: Pavement and intersection works along Moorebank Avenue  Works Period E: Bulk earthworks, drainage and utilities

Additional details of the Development delivery phases are included in the Construction Environmental Management Plan (CEMP).

### 1.5. Purpose and Application

This CHMP has been developed to address the CoCs, and the final compilation of mitigation measures (FCMMs), and is based on the Archaeological Heritage Management Service (AHMS) Aboriginal Heritage Impact Assessment (AHMS, 2012 and 2015), Artefact Aboriginal Heritage Impact Assessment for Stage 2 (Artefact 2016a) and Artefact Non-Indigenous Heritage Impact Assessment (Artefact 2012 and 2016b).

This plan provides methods to measure and reduce the impact to Aboriginal and non-Aboriginal heritage by the contractor during the construction phase of the Development, including all contractor and consultant partners.

The most recent, approved version of this plan is to be implemented to manage Development activities for the duration of construction.

### 1.6. Staged Submission of this Plan

Subject to the consent of the Secretary (CoC A14), the Development has elected to stage the submission of a number of strategies, plans and programs that are required by the CoCs based on the Delivery Works Phases identified in Table 1-2.

In accordance with CoC A15, Table 1-2 identifies the stage of the development to which this document applies, and the relationship between any future stage. The trigger for updating the document is also identified in Table 1-2. When a document is updated, the most recent version of the document will supersede the previous version(s).

Table 1-2 Staged Documentation and Triggers to Satisfy CoC A15

Delivery Works Phases	General Description of Works	Current Document	Trigger to Update Document
<b>Early Works</b>			
Early Works	Utilities adjustments and relocations, clearing and stripping of topsoil, heritage salvage, fill importation,	Document prepared to address Early Works only	Prior to the commencement of construction works (update to either Phase



Delivery Works Phases	General Description of Works	Current Document	Trigger to Update Document
	establishment of site access, temporary fencing and compound establishment, and other activities determined by the ER to have minimal environmental impact		A-specific or Phase B document)
<b>Construction</b>			
Construction Phase A	Early Works activities, bulk earth works, drainage and utilities, construction and internal fit-out of warehousing and finishing works	Document prepared to address Construction Works Phase A only (does not address Moorebank Avenue upgrade works)	Prior to the commencement of Moorebank Avenue upgrade works
Construction Phase B	Construction Phase A activities, construction of the Moorebank Avenue Diversion Road, bulk earthworks, drainage and utilities and pavement works	Document prepared to address all construction works (Phase A + Phase B)	

### 1.7. Objectives and Targets

The following objectives and targets are set for the Development for the management of Aboriginal and non-Aboriginal heritage (Table 1-3).

Table 1-3 Objectives and Targets

Objective	Target	Timeframe	Accountability
To implement heritage management controls as outlined within this CHMP to minimise impacts during construction and to comply with contractual and legislative requirements	No known heritage sites or items disturbed or damaged	Duration of Construction	Contractor's Construction Manager (CM)
To implement the unexpected finds protocol to minimise impacts on unknown heritage items	STOP works in 100% cases where potential heritage is identified in accordance with the unexpected finds protocol	Duration of Construction	Contractor's CM
Maintain the Development personnel's awareness of aboriginal	100% of employees to attend environmental site induction	Duration of Construction	Contractor's Environmental Manager (EM)



Objective	Target	Timeframe	Accountability
and non-aboriginal heritage			

### 1.8. Consultation

This CHMP has been prepared in consultation with Heritage NSW, Liverpool City Council, relevant landowners and stakeholders including the Moorebank Heritage Group and Department of Defence as outlined below (Table 1-4). Registered Aboriginal Parties (RAPs) were not consulted in the preparation of this plan as this is not a requirement of CoC B92. However, CoC B97 requires consultation with RAPs be undertaken during the preparation of the Unexpected Finds Protocol which is outlined below (Table 1-5). Supplementary information to support the consultation undertaken is included in Appendix B.

Table 1-4 Consultation Summary

Agency	Dated	Person Contacted	Comments	Status
Department of Defence	02/03/2018	Department of Defence representative	This plan emailed for review and comment. Noted that this plan had been prepared per the Early Works Heritage Management Plan (EWHMP). Confirmation of approach to consultation requested.	Closed
	06/03/2018	SIMTA	Email received from Department of Defence representative noting that they had no comments on the plan.	Closed
Moorebank Heritage Group	02/03/18	Moorebank Heritage Group representative	This plan emailed for review and comment. Noted that this plan had been prepared per the EWHMP. Confirmation of approach to consultation requested.	Closed
	12/03/18	SIMTA	Email received from Moorebank Heritage Group representative noting that select review comments on the EWHMP applied to the CHMP.	Closed
Liverpool City Council	02/03/18	Liverpool City Council representative	This plan emailed for review and comment. Noted that this plan had been prepared per the EWHMP.	Closed

Agency	Dated	Person Contacted	Comments	Status
Heritage NSW			Confirmation of approach to consultation requested.	
	08/03/18	SIMTA	Email from Liverpool City Council representative acknowledging that the CHMP had been prepared in accordance with Liverpool City Council's comments on the EWHMP. One other comment was raised.	Closed
	02/03/18	Heritage representative	This plan emailed for review and comment. Noted that this plan had been prepared per the EWHMP. Confirmation of approach to consultation requested.	Closed
	22/03/18	Heritage representative	Phone conversation; SIMTA requested an update on the status of review comments. NSW Heritage Division representative noted that the review was underway and comments would be provided early week of 26/3/18, pending sign off by the delegate.	Closed
	03/04/18	SIMTA	Email from Heritage NSW representative providing comments on this plan. Consultation considered closed based on the appropriate addressing of NSW Heritage comments.	Closed

Table 1-5 Consultation Summary Unexpected Finds Protocol

RAP	Date	Person Contacted	Comment	Status
Tharawal Local Aboriginal Land Council (LALC)	24/04/18	Tharawal LALC representative	The Unexpected Finds Protocol emailed for review and comment.	Closed
	16/05/18	Tharawal LALC representative	Phone conversation and email sent asking when comments would be provided to SIMTA	Closed
	23/05/18	Tharawal LALC representative	Phone conversation and email sent asking when comments would be provided to SIMTA	Closed



RAP	Date	Person Contacted	Comment	Status
	23/05/18	SIMTA	Email sent acknowledging receipt of Unexpected Finds Protocol and Tharawal LALC representative noted that review was underway.	Closed
	30/05/18	Tharawal LALC representative	Phone conversation and email follow up, requesting update on completion of review.	Closed
	05/06/18	Tharawal LALC representative	Phone conversation and email follow up, requesting update on completion of review.	Closed
	06/06/18	Tharawal LALC representative	Phone conversation and email follow up, requesting update on completion of review.	Closed
	07/06/18	SIMTA	Email from Tharawal LALC representative providing comments on the Unexpected Finds Protocol.	Closed
	12/06/18	Tharawal LALC representative	Email sent to Tharawal LALC representative responding to their comments on the Unexpected Finds Protocol.	Closed.

## 2. Environmental Management

### 2.1. Legal and Other Obligations

Table 2-1 below details the legislation, planning instruments and guidelines considered during development of this sub-plan.

Table 2-1 Legislation, Planning Instruments and Guidelines

Legislation and Guidelines	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 Environment 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 MPE projects as a whole are a controlled action under the EPBC Act with controlling provisions related mainly to the Rail connection.</p> <p>The 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 which provides protection under the provisions of the EP&amp;A Act.</p>
<i>National Parks and Wildlife Act 1974</i>	The relevance of this Act is 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.	Aboriginal Heritage Items have been identified within the construction area but will not be impacted. 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
<i>Heritage Act 1977</i>	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.	Heritage Items are identified on the site and addressed as part of the CoCs. An approval under Part 4, or an excavation permit under Section 139, of the Heritage Act 1977 is not required for works approved under Part 4.1 of the EP&A Act.

Legislation and Guidelines	Description	Relevance to this CHMP
	<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><i>Australian Heritage Council (Consequential &amp; Transitional Provisions) Act 2003</i></p> <p><i>Australian Heritage Council Act 2003 (Cwth)</i></p>	<p><i>The Australian Heritage Council (Consequential and Transitional Provisions) Act 2003 repealed the Australian Heritage Commission Act 1975.</i></p> <p><i>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.</i></p>	The site is not on Register of the National Estate of places.
<i>Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cwth)</i>	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.	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 Development.
Guideline for the Preparation of Environmental Management Plans (DIPNR, 2004)	<p>The Guideline assists government agencies, contractors and developers prepare effective environmental management plans.</p> <p>The purpose is to provide a minimum standard and consistent approach to the preparation of environmental management plans.</p>	This plan has been structured to align with Figure 4-1 of the guideline with information relating to each of the headings and subheadings included.
Assessing Heritage Significance (NSW Heritage Office 2001)	The guideline provides an overview of the heritage management system in NSW, heritage significance criteria and a procedure to assess the heritage significance of an area or item.	The CHMP uses information from the EIS heritage report that assessed heritage values and significance of the precinct in accordance with these guidelines.
Assessing Significance for Historical Archaeological Sites and Relics (NSW Heritage)	The guideline provides an overview of NSW heritage criteria, levels of significance, ranking of the significance	The archaeological assessment prepared for the EIS that informs the CHMP was prepared in

Legislation and Guidelines	Description	Relevance to this CHMP
Branch, Department of Planning (2009)	of a historical archaeological site and relic and measures to protect archaeological sites and relics.	accordance with this guideline. The Archaeological Monitoring Strategy which is included in Appendix B outlines archaeological management in accordance with this guideline
How to prepare Archival Recording of Heritage items (Heritage Branch, 1999)	The guideline outlines how to prepare an archival record, the different types of archival records and how to store and collate archival records.	Archival recording is required under the approval (B91) and is referenced in the CHMP. Archival recording has been undertaken in accordance with this guideline
Photographic recording of heritage items using film or digital capture (Heritage Branch, 2006)	The guideline provides an overview of how to make a photographic record of sites, buildings, structures and moveable items of heritage significance	Archival recording is required under the approval (B91) and is referenced in the CHMP. Archival recording has been undertaken in accordance with this guideline
Guidelines for the Management of Human Skeletal Remains under the Heritage Act 1977	The guideline outlines practices to manage human skeletal remains.	The UFP included in the CHMP has been prepared in accordance with this guideline.

## 2.2. Development Consent Compliance Matrices

Development consent compliance matrices are included in Appendix A.

## 2.3. Roles and Responsibilities

All Development personnel are responsible for the implementation of this CHMP and have responsibility to stop works if there is potential for a safety or environmental incident to occur.

Roles and responsibilities associated with this heritage management plan are presented in Table 2-2.

Table 2-2 Roles and Responsibilities

Role	Responsibilities
<b>Principal's Representative</b>	<ul style="list-style-type: none"> <li>Review the CHMP to check that it meets all relevant regulatory and Development requirements</li> <li>Provide resources for the ongoing conservation and preservation of the items of heritage to be used for interpretation purposes</li> <li>Review the Contractor's environmental monitoring reports and compliance documentation to confirm that the CHMP is being implemented</li> <li>Issue a stop work direction immediately where an unacceptable environmental impact may occur</li> <li>Liaise with relevant regulators if an incident occurs</li> </ul>



Role	Responsibilities
	<ul style="list-style-type: none"><li>• Conduct internal audits of the system</li><li>• Review audit outcomes and act as necessary</li><li>• Review environmental performance through the monthly reporting cycle</li><li>• To manage all aspects of the contract between LOGOS and the Construction Contractor</li><li>• Stop works if required</li><li>• Notify NSW Heritage Council of any confirmed unexpected finds</li></ul>
<b>Contractor's Construction Manager (Contractor's CM)</b>	<ul style="list-style-type: none"><li>• Communicating with all personnel and sub-contractors regarding compliance with the CHMP and site specific environmental issues / EWMS</li><li>• Undergo induction and training in environmental awareness as directed by management</li><li>• Identifying resources required for implementation of the CHMP</li><li>• Organise and manage site plant, labour and temporary materials</li><li>• Co-ordinate the implementation and maintenance of site environmental controls and provide support for the Contractor's EM</li><li>• Report all environmental incidents in accordance with incident reporting protocol</li><li>• Take action to resolve non-conformances and incidents</li><li>• Be contactable 24 hours a day</li><li>• Direct works to be performed in a more environmentally responsible manner that reduces impacts or stop works if there is a risk of environmental harm.</li></ul>
<b>Contractor's Environment Manager (Contractor's EM)</b>	<ul style="list-style-type: none"><li>• Notify NSW Heritage Council of any confirmed unexpected finds</li><li>• Assist and guide the respective workers to meet their environmental responsibilities</li><li>• Check and monitor the implementation of this CHMP</li><li>• Report to the Contractor's CM on environmental issues</li><li>• Monitor the rectification of incidents</li><li>• Provide technical advice to personnel and management in the review of work methods</li><li>• Oversee the conduct a site start-up meeting with the site personnel on site</li><li>• Implement appropriate action to address any environmental incidents</li><li>• Manage and investigate identified non-conformances to CoC</li><li>• Development, implementation, monitoring and update of the CHMP</li><li>• Identify environmental risks and implement appropriate mitigation measures implemented</li><li>• Develop environmental site induction and maintain a register of attendance</li><li>• Present and participate in toolbox meetings</li><li>• Manage environmental document control, reporting, inductions and training</li><li>• Oversee site monitoring, inspections and internal audits</li></ul>



Role	Responsibilities
	<ul style="list-style-type: none"><li>• Manage all sub-contractors and consultants with regards to environmental matters, including assessing their environmental capabilities and overseeing the submission of their environmental documents</li><li>• Respond to stakeholder enquires / complaints within required timeframes</li><li>• Undergo induction and training in environmental awareness as directed by management</li><li>• Act as a 24-hour contact (if other staff as outlined above are not available).</li><li>• Direct works to be performed in a more environmentally responsible manner that reduces impacts or stop works if there is a risk of environmental harm</li><li>• Liaise with construction team as required in order to implement the Infrastructure Sustainability Council of Australia (ISCA) requirements</li><li>• Cooperate and participate in audits and action results of any audit findings</li></ul>
Site Supervisors	<ul style="list-style-type: none"><li>• Implement and maintain environmental controls around confirmed, or potential, heritage items on-site and maintain or erect exclusion zones in the event of a potentially unexpected find</li><li>• Present and participate in toolbox talks and meetings</li><li>• Train staff in their obligations under the EWMS</li><li>• Meet environmental reporting requirements of the Development</li><li>• Undergo induction and training in environmental awareness as directed by management</li><li>• Direct works to be performed in a more environmentally responsible manner that reduces impacts or stop works if there is a risk of environmental harm.</li></ul>
Development Heritage Consultant	<ul style="list-style-type: none"><li>• Provide advice to minimise potential impacts to any Aboriginal or historic heritage values that may be identified during construction activities</li><li>• Identify potential finds, and in consultation with the Contractor's EM and principal's Representative, report to the NSW Heritage Council</li><li>• Undertake any archival recording and documentation of heritage items as required.</li></ul>
All personnel	<ul style="list-style-type: none"><li>• Minimise the potential of pollution of land, air and water</li><li>• Preserve the natural and cultural heritage environment</li><li>• Minimise the occurrence of offensive noise</li><li>• Take all feasible and reasonable steps to ensure compliance with the requirements of this CHMP</li><li>• Comply with the relevant Acts, Regulations and Standards</li><li>• Comply with the Development policies and procedures</li><li>• Comply with the CHMP</li><li>• Comply with lawful management directions</li><li>• Reporting any potential unexpected finds to the Site Supervisors and Contractor's EM</li></ul>



Role	Responsibilities
	<ul style="list-style-type: none"> <li>Promptly report to management on any non-conformances, environmental incidents and / or breaches of the system</li> <li>Undergo induction and training in environmental awareness as directed by management</li> <li>Report all incidents in accordance with reporting requirements outlined in this CHMP</li> <li>Fulfil the General Environmental Obligations</li> <li>Undertake works in a manner that will enable the Development to implement ISCA requirements.</li> </ul>

## 2.4. Training

All personnel working on the Development are to undergo general environmental awareness training in accordance with Section 2.7.1 of the CEMP. Records of Development environmental induction and other environmental training are to be maintained in the Construction Contractor's site office.

As a minimum the site induction to include the following:

- Awareness of obligations to minimise impacts to non-Aboriginal heritage under the *Heritage Act 1977*
- Outline of the location and type of archaeological sites within the Development area including instructions not to disturb these sites
- Clear information about statutory obligations for heritage NSW National Parks and Wildlife Act 1974 (NPW Act). The 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*
- Information 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
- Plans of the Development site and surrounding area that identify sites of Aboriginal and Non-Aboriginal heritage sensitivity. This will include environmental control maps that identify heritage sites and items on and around the Development site.
- Examples of Aboriginal and non-Aboriginal items that may be expected on the site and how to identify them.
- Unexpected Finds Protocol and reporting requirements for discovery of potential and previously unknown heritage and archaeological items

Toolbox meetings are to be undertaken, as and when required.

Competency training to be provided by the Construction Contractor as required and may include a certification, vocational qualification or a competency assessment. Where possible and appropriate, training to contractors and sub-contractors are to involve

representatives from Gandangara and/or Tharawal Local Aboriginal Land Councils as they will be able to provide an understanding of the local significance of the area and what likely artefacts might be found.

Records of all training are to be filed in accordance with the document control system outlined in the CEMP.

### **3. Implementation**

#### **3.1. Existing Environment**

The Development site was previously operating as the DNSDC; however, Defence 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 Barracks 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 LOGOS site and the Wattle Grove residential area
- Defence Joint Logistics Unit (East), to the north and north east of the LOGOS 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 EIS for the Development:

- Aboriginal Heritage Impact Assessment, prepared by AHMS in 2012 and updated in 2015
- Non-Aboriginal Heritage Impact Assessment, prepared by Artefact Heritage in 2012 and updated in 2015
- MPE Stage 2 Aboriginal heritage assessment (Artefact 2016a)
- MPE Stage 2 Non-Aboriginal heritage assessment (Artefact 2016b)

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

##### **3.1.1. Aboriginal Heritage**

No previously registered Aboriginal sites are located in the Development site (Figure 3-1). A number of studies have been completed for the Development site as summarised below.

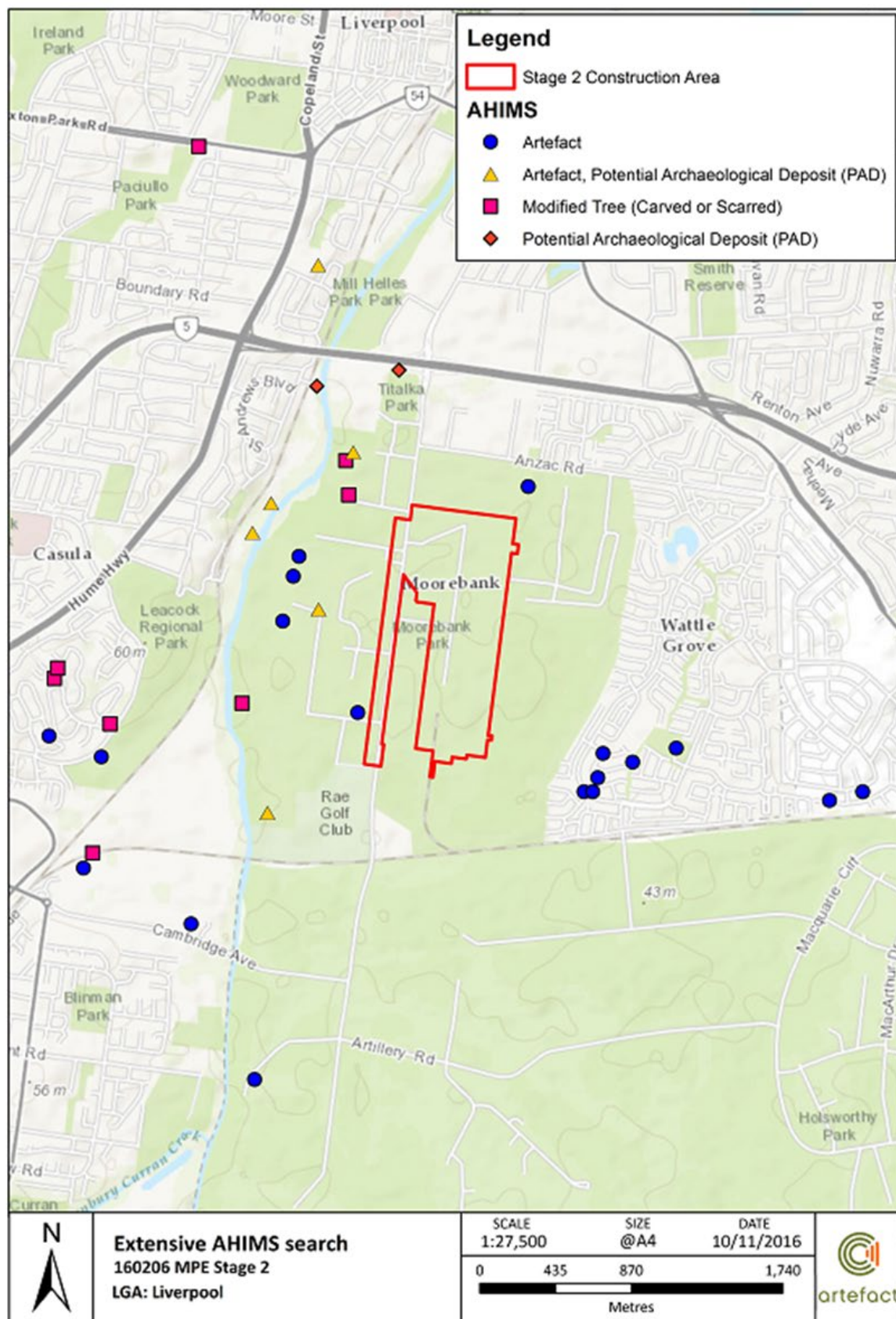


Figure 3-1 Aboriginal Heritage Information Management Service search results (Artefact 2016)

Steele and Dallas (2001) undertook a heritage assessment of the Moorebank Defence area (including the Development 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 3-2. The Development site was assessed as having no archaeological potential.

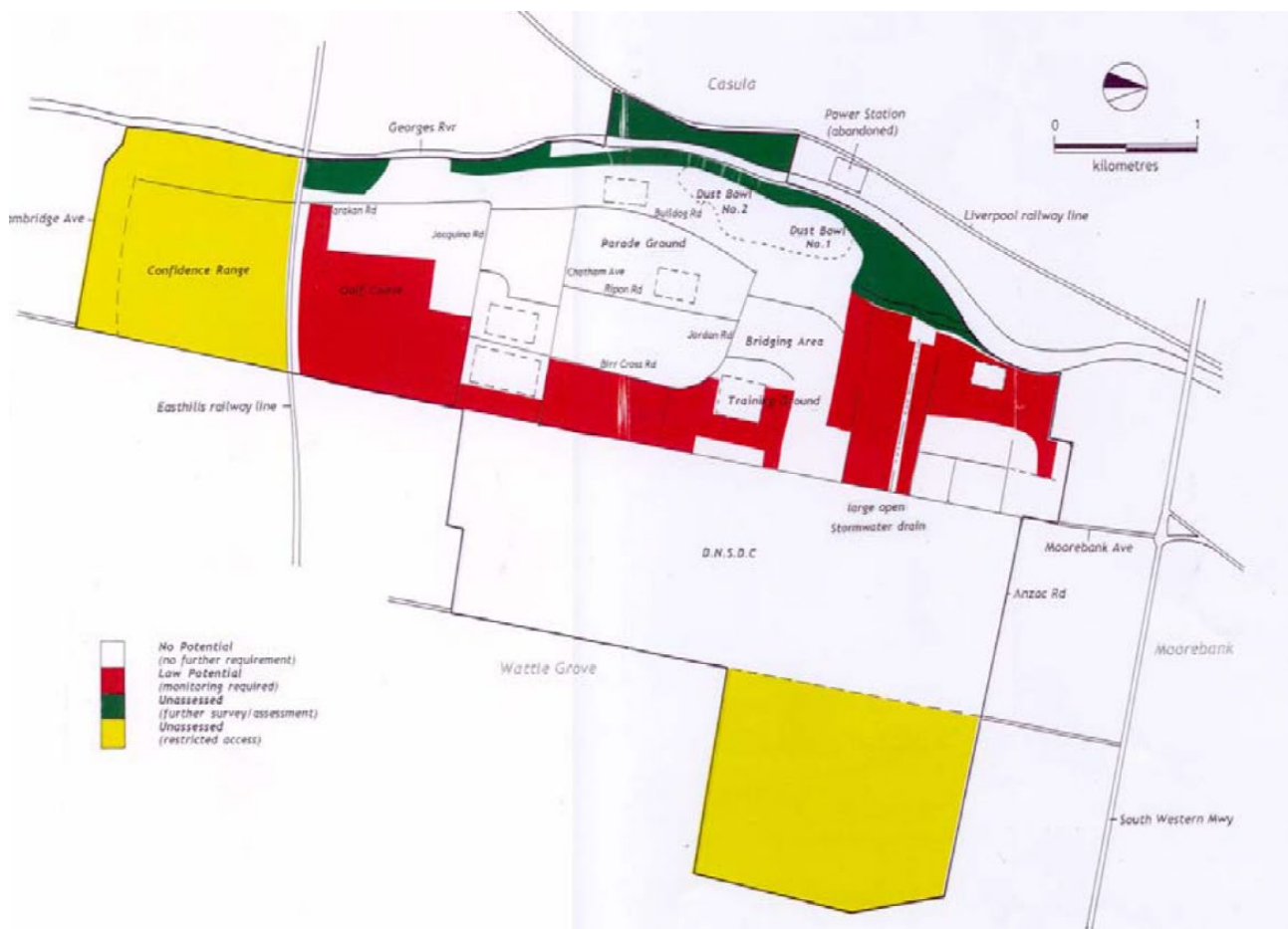


Figure 3-2 Archaeological Sensitivity of the Moorebank Defence Area (Steele & Dallas 2001)

The Development 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, four isolated objects (Isolated Find #1, 2, 3 and 4) occur within the Development site and none of the PADs are located within the Development site. Descriptions of these sites are provided in Table 3-1. Areas of archaeological sensitivity mapped by AHMS in their 2015 update of the 2012 survey are shown in Figure 3-3.



Construction Heritage Management Plan



Figure 3-3: Aboriginal sites and area of sensitivity as identified by AMHS 2015

Date: 28/02/2020 Path: \\mo-sus-ma-fs-01\jobs\AA008765\L-GIS\A\_Current\B\_Maps\MPE2\MPE2\_CEMP\MPE2\_CEMP\MPE2\_CEMP\MPE2\_CEMP\_002\_FormerAboriginalHeritage\_AAP\_v3.mxd  
Created by: TT  
QA by: AB

Figure 3-3 Aboriginal Sites and Area of Sensitivity as Identified by AMHS 2015

### 3.1.1.1. MPE Stage 2 Development Site

The Development site was assessed as highly disturbed and modified. There were no areas of PAD identified within the site and overall, the site is considered to have low to nil potential to contain intact archaeological deposits.

MPE Isolated Artefact 1 was recorded by AHMS in 2012. It was assessed as having low archaeological significance. The site was not recorded on the AHMS register and no site card is available. The artefact was not located during the site visit for the MPE Stage 2 assessment (Artefact 2016). The search was informed by information presented in the AHMS assessment report. As the artefact could not be relocated and the site has not been registered, it is recommended that no additional assessment or management of the site is required.

MPE Isolated Artefacts 2, 3 and 4 identified by AHMS in 2012 are located south of the DNSDC site in the southern portion of the Development site. **An exclusion zone is to be provided around these artefacts so no impact would result from the construction of the Development.**

The Development will not impact Aboriginal heritage values or any registered Aboriginal objects. As there will be no impacts to known Aboriginal objects, or to areas of Aboriginal archaeological potential, no specific archaeological management is required. Any finds will be treated as unexpected as per the Unexpected Finds Protocol.

Table 3-1 Previously Recorded Indigenous Heritage Sites within (or close to) the Development Site

Site Name	Location	Description
PAD 3 <i>No longer recognized as a PAD</i>	South of the Development site	<p>Wooded area bounded by LOGOS 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 PAD.</p>

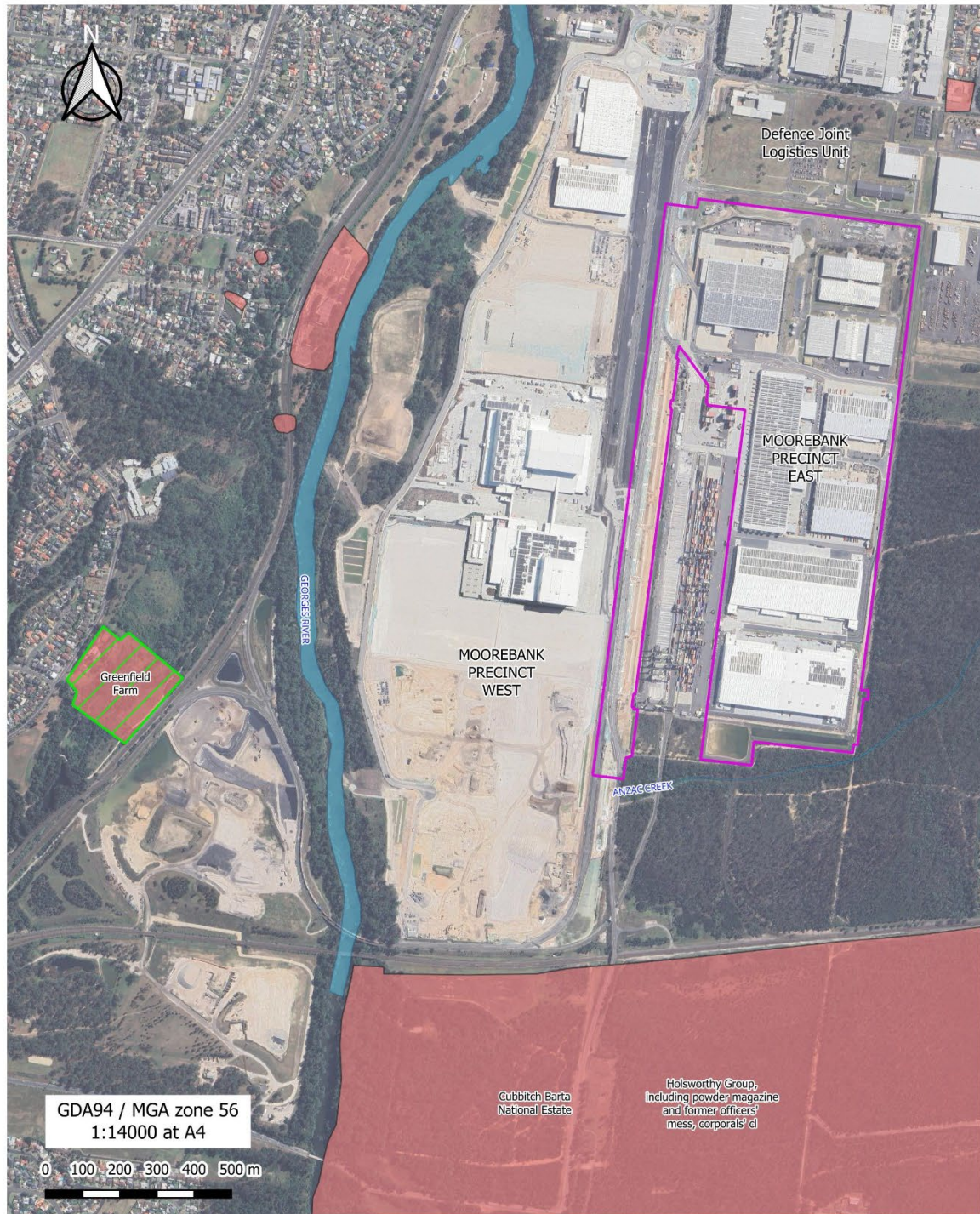
<b>Site Name</b>	<b>Location</b>	<b>Description</b>
Isolated Fine #1	Within Development impact area	No site card submitted and could not be relocated during MPE Stage 2 survey.
Isolated Fine #2	Within Development impact area, exclusion zone to be provided	Mudstone possible flake core; found near vehicle track in mud.
Isolated Fine #3	Within Development impact area, exclusion zone to be provided	Red/black silcrete possible core with one negative flake scar; found near vehicle track in mud.
Isolated Fine #4	Within Development impact area, exclusion zone to be provided	Chert core with 8 negative flake scars; found near vehicle track in mud.

### **3.1.2. Non – Aboriginal Heritage**

#### **3.1.2.1. Listed Items**

Figure 3-4 shows the listed heritage items within the vicinity of the Development.





**LEGEND**

- MPE Stage 2 construction area
- State Heritage Act (SILEP, HER, DPE 2017)
- Heritage Item - General (SILEP, HER, DPE 2017)
- Watercourse
- Existing Railway

Moorebank  
Intermodal Precinct

**ASPECT**  
ENVIRONMENTAL



Figure 3-4 Listed heritage items

The DNSDC, which incorporated the majority of the Development 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 Schedule 5 of the Liverpool Local Environment Plan. 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.

#### **3.1.2.2. Historic Context**

As described by Artefact (2012), the first land parcels in the Liverpool area were granted in 1798 to Thomas Moore. 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 (shown in Figure 3 5) (Artefact 2012).

Military activities occurred within the local region from the early 1900s, and the area north of the Development 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 Development 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).



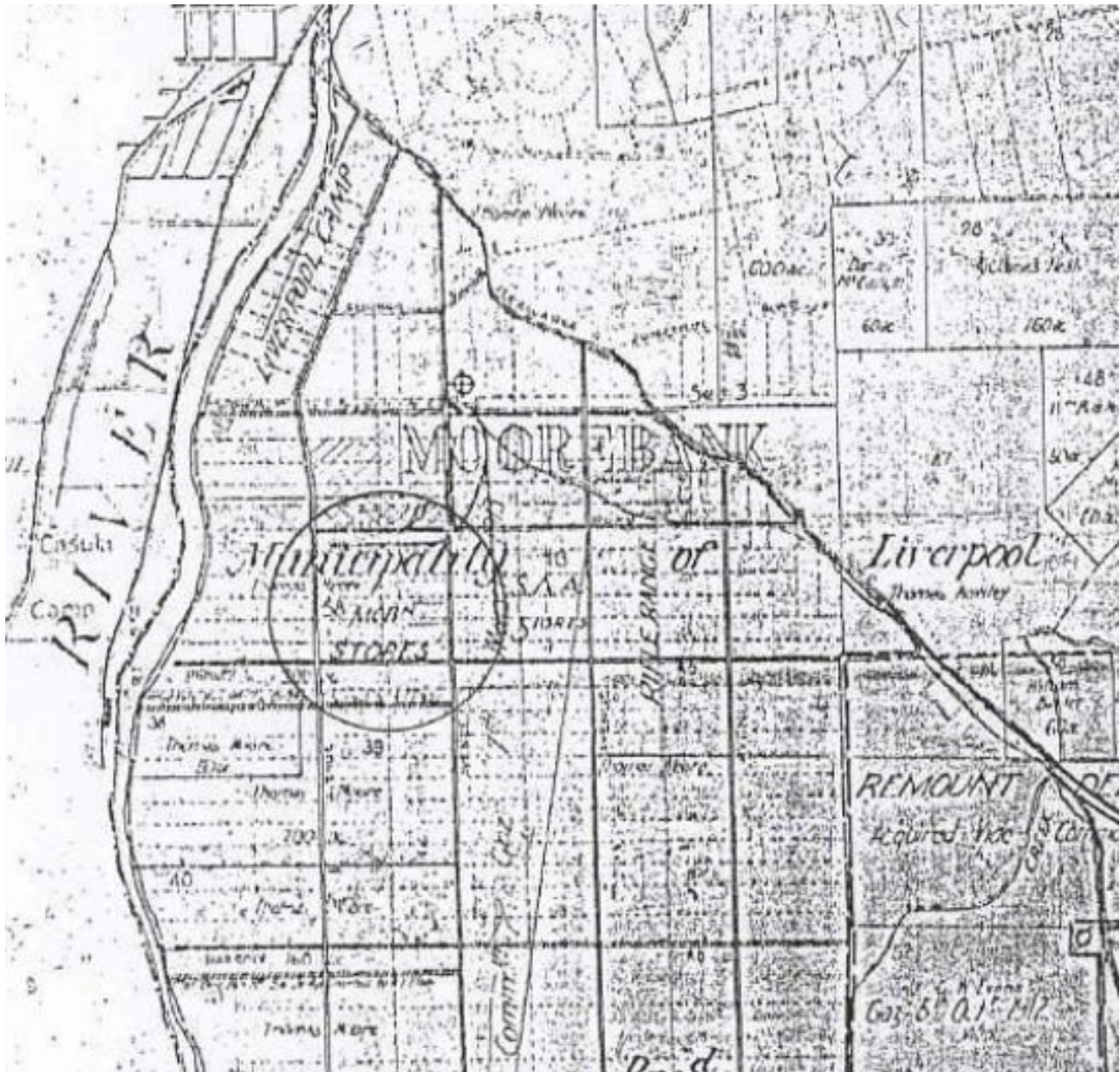


Figure 3-5 Site Layout (Artefact Heritage 2015).

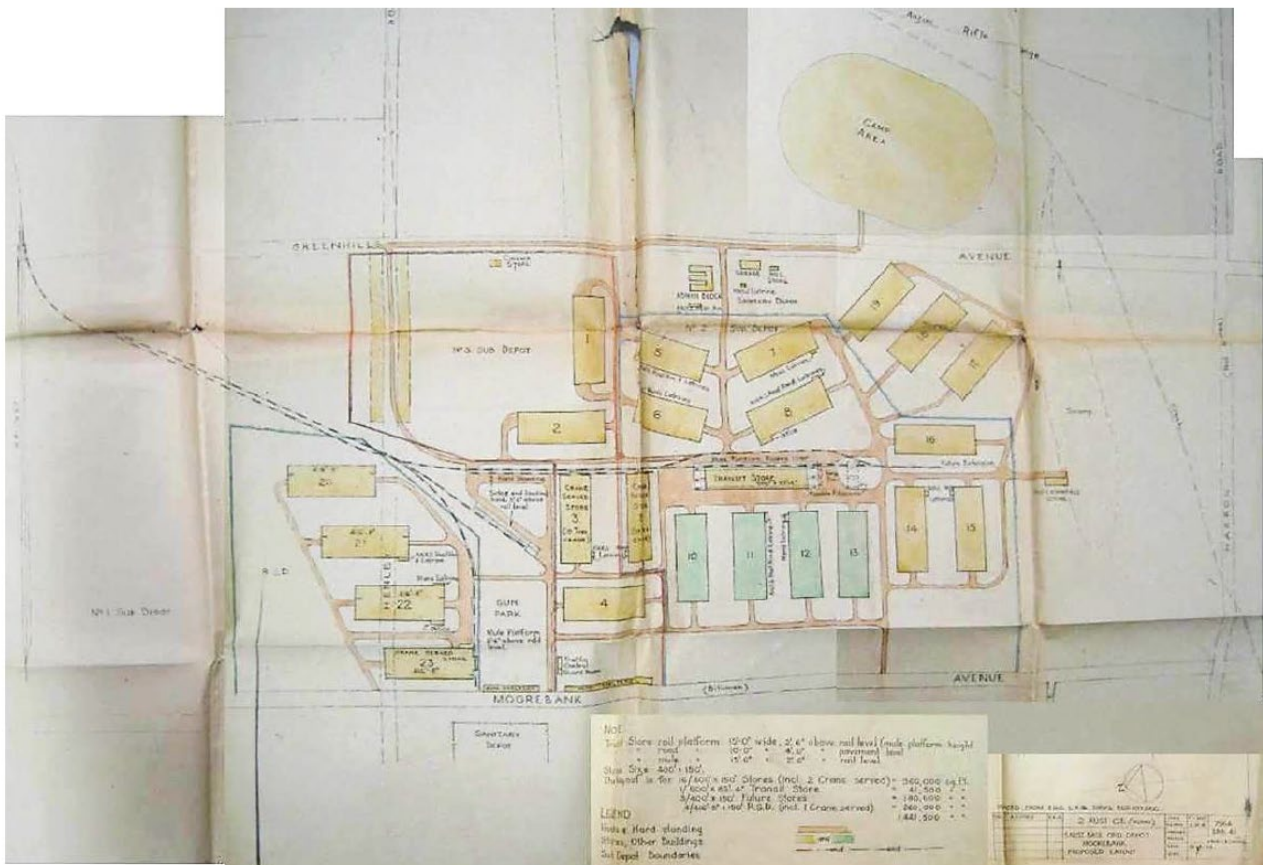


Figure 3-6 Plan of Proposed Layout of Moorebank Ordnance Depot 25/4/44 (NAA SP459/1, 420/7/1153) (Artefact 2012).

Further development of military sites occurred during the beginning of WWII. The School of Military Engineering was established to the east of the Georges River and west of the Development 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 1944 which formed the first construction phase of the DNSDC site (which incorporated the Development site) (Artefact 2012). A plan from April 1944 (Figure 3-6) 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 3-7 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 (Figure 3-7). 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 Development 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 Development site (Artefact 2012).

### 3.1.2.3. Existing Non-Aboriginal Heritage Values

#### Defence National Storage and Distribution Centre

As described by Artefact (2012) the MPE 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 DNSDC, which includes the Development site was previously included on the 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 buildup 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 an 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 sitting 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 are good and rare examples of this type.

Within the Development site, impacts to state listed heritage will 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 Development will result in permanent direct impacts to all remaining structures within the former DNSDC site and would remove all heritage values. The item will no longer retain its State heritage significance and would be likely delisted from the Liverpool Local Environment Plan 2008.

The heritage buildings to be impacted are identified in Figure 3-8.

#### School of Military Engineering

The School of Military Engineering is listed on the Liverpool Local Environmental Plan (2008) under its alternate name, the Australian Army Engineers Group (Item 57). This listing notes that the site includes the Royal Australian Engineers (RAE) Memorial Chapel, RAE Monument, Major General Sir Clive Steele Memorial Gates, and The Cust Hut. According to the Liverpool Local Environmental Plan Heritage map, the School of Military Engineering also encompasses most of the land surrounding the former DNSDC site, between the East Hills railway line and Anzac Road, as well as a building on the north side of Anzac Road.

The following statement of significance for the School of Military Engineering is taken from the State Heritage Inventory listing for the site:

*"The School of Military Engineering demonstrates the military history, particularly the engineering military history of the area. The site encompasses a complex of heritage items that are associated with the Royal Australian Engineers. It traces the evolution of the technologies used by the RAE. Much of the war memorabilia on display is now rare. The site is representative of the RAE's pride in their military past and present. There is the potential to gain more information on the site from further architectural, archaeological and documentary research."*

The Development will result in minor impacts to the School of Military Engineering curtilage. These impacts will not result in loss of heritage values as the heritage values of the place will be impacted by the MPW Development, which are already assessed under separate applications and approvals.



Construction Heritage Management Plan

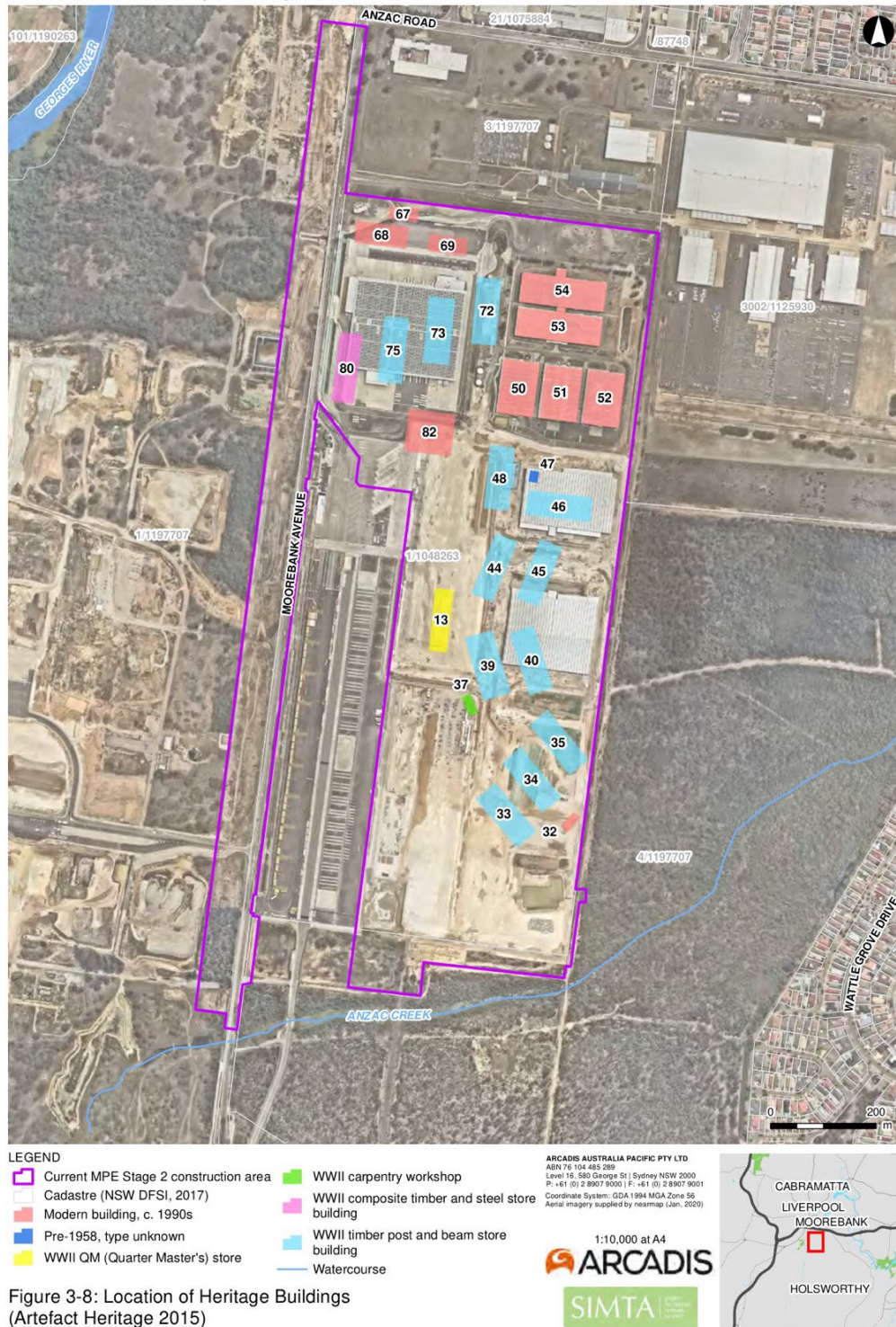


Figure 3-8 Location of Heritage Buildings (Artefact Heritage 2015)



#### 3.1.2.4. Areas of Archaeological Potential

Artefact Heritage (2016) also identified several areas of historic heritage archaeological potential, as shown in Figure 3-9 and described in Section 3.1.2.

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 including:

- Ground disturbance levels that may have impacts on any archaeology,
- 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
- Any remains would be minor or insubstantial, as would be the case for mains attached latrines or very small structures.

Within the Development site only PAD W and V have the potential to contain archaeological remains of local significance. Monitoring and recording of PADs V and W was undertaken from 19 to 21 March 2018. No significant archaeological deposits were found, and no further testing around PADs V and W was recommended in the report 'Summary of Excavation Results and Future Management - Moorebank Precinct East (MPE) PADs V and W' dated 16 April 2018.

The remaining PADs (E to U) represent areas where there remains a low probability of unexpected finds to be uncovered during construction. All PADs are identified in Table 10 below.

Table 3-2 Archaeological Potential

Potential Archaeological Deposit (PAD)	Description	Potential Nature of Archaeological Remains	Disturbance	Archaeological Potential
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
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
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
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	Moderate

Potential Archaeological Deposit (PAD)	Description	Potential Nature of Archaeological Remains	Disturbance	Archaeological Potential
L	This PAD 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
O	The large former structure at PAD O 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. The location is currently hardstand which may be a remnant of the original structure.	Footings, wood or steel structural remains and evidence of cut and fill	Low	Moderate
P	PAD P comprises a collection of small structures associated with the WWII warehouses. The structures abutting the warehouses where latrines or stores and are marked on the 1944 plan. The nature of the four structures which were not directly attached to the warehouses is not known and could not be identified by documentary research. It is assumed they were ancillary or administrative structures.	Footings, wood or steel structural remains and evidence of cut and fill. Accidentally deposited artefacts or rubbish if drop toilets were installed.	Moderate	Moderate
Q	PAD Q comprises a collection of small structures associated with the WWII warehouses. The structures abutting the warehouses where latrines, offices or stores and are marked on the 1944 plan. The nature of the larger structure to the north of the PAD is not known. There is a smaller structure marked on the 1944 plan as a store. The store may have been extended up to 1966.	Footings, wood or steel structural remains and evidence of cut and fill. Accidentally deposited artefacts or rubbish if drop toilets were installed.	Moderate	Moderate

Potential Archaeological Deposit (PAD)	Description	Potential Nature of Archaeological Remains	Disturbance	Archaeological Potential
R	The former structure at PAD R was likely to be a store or smaller warehouse. The nature of the structure has not been identified through documentary research.	Footings, wood or steel structural remains and evidence of cut and fill	Moderate	Low
S	The four small structures at PAD S are likely to be latrines, offices and stores. Two of the structures are shown on the 1944 plan as latrines.	Footings, wood or steel structural remains and evidence of cut and fill. Accidentally deposited artefacts or rubbish if drop toilets were installed	Moderate	Moderate
T	A number of structures are located between the two WWII warehouses in PAD T. The structures are not shown on the 1944 plan and their nature cannot be identified through documentary research. It is noted that a road is located where the structures were in the 1944 plan and 1951 aerial.	Footings, wood or steel structural remains and evidence of cut and fill	Moderate	Low
U	The three structures at PAD U are not on the 1944 plan but are shown on the 1951 aerial. It is likely that they are stores of some kind and it is noted that access ways are visible into the structures on the 1951 aerial. It is likely that these items had slab floors which would limit the potential for archaeological remains to be present. A modern warehouse has been constructed at the location of the northernmost structure built over by.	Footings, wood or steel structural remains and evidence of cut and fill	Moderate	Low
V	The small cluster of structures in PAD V are visible on the 1951 aerial. The nature of the structures is not known, although it is likely they are administration facilities	Footings, wood or steel structural remains and evidence of cut and fill.	Low	Moderate-high*

Potential Archaeological Deposit (PAD)	Description	Potential Nature of Archaeological Remains	Disturbance	Archaeological Potential
		Potential for evidence for use of structures.		
W	The small cluster of structures in PAD W are visible on the 1951 aerial. The nature of the structures is not known, although it is likely they are administration facilities	Footings, wood or steel structural remains and evidence of cut and fill. Potential for evidence for use of structures.	Low	Moderate-high*

\* Testing and monitoring of PADs V and W was undertaken from 19 to 21 March 2018. No significant archaeological deposits were found. A report entitled 'Summary of Excavation Results and Future Management – Moorebank Precinct East (MPE) PADs V and W' dated 16 April 2018, concluded that no further testing around PADs V and W is required.

Construction Heritage Management Plan

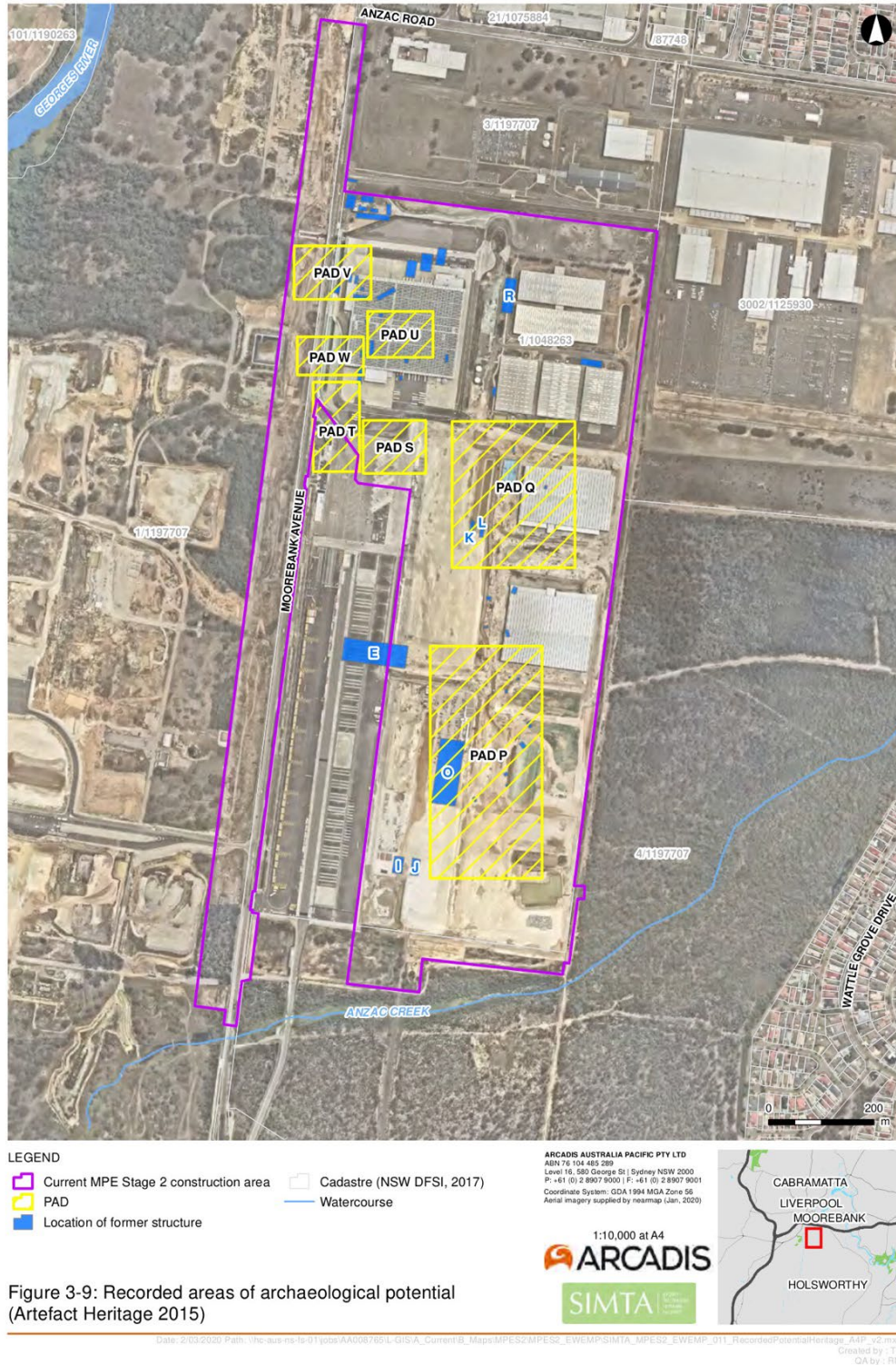


Figure 3-9 Recorded Areas of Archaeological Potential (Artefact Heritage 2015).

## 3.2. Aspects Impacts and Risks

### 3.2.1. EIS Identified Impacts

The MPE Stage 2 EIS identified the following non-Aboriginal impacts related to the Development:

- The removal of all heritage values from the former DNSDC site and the loss of its heritage significance
- More specifically, direct impacts have occurred to 15 WWII era store buildings, comprising one composite timber and steel store (Building 80), 13 timber post and beam stores including the Quarter Master's store (Buildings 33-35, 39-40, 44-46, 48, 72-73, 75 & 13) and the carpentry workshop (Building 37)
- The removal of original roads and open drain alignments running through the Proposal site has occurred (except for 50series warehouse area)
- Impacts to potential archaeological material associated within former structures located within the Proposal site has occurred
- Impacts to underground water mains and sewerage lines within the Proposal site, as visible on a 1958 plan of the site, which probably date to the 1940s has occurred
- Impacts to the curtilage of the School of Mechanical Engineering site to the west as a result of Moorebank Avenue upgrade has occurred.

No impacts are expected to Aboriginal heritage values as a result of the Development.

### 3.2.2. Construction Impacts

Further to Section 3.2.1, construction impacts directly related to Aboriginal and non-Aboriginal heritage are described in Table 3-3 Table 3-4, and the aspects and impacts register in the CEMP. Management measures to address these identified risks are included in Section 3.3.

Table 3-3 Potential Construction Impacts to Aboriginal Heritage

Activity	Aspect/s	Impacts
Bulk earthworks	Excavation, vibration, cutting and filling,	Finding/disturbance to and/or destruction of unexpected burials, human remains or other Aboriginal objects.
Construction of warehousing	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 signals, signs and lights and various finishing works	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.	Excavation, vibration and soil compaction due to use of heavy machinery, cutting and filling.	Finding/disturbance to and/or destruction of unexpected burials,

Activity	Aspect/s	Impacts
		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 3-4 Potential Construction Impacts to Non-Aboriginal Heritage

Activity	Aspect/s	Impacts
Bulk earthworks	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 warehousing	Excavation, vibration, cutting and filling, construction of buildings	Finding/disturbance to and/or destruction of unexpected non-Aboriginal heritage items.
Construction of Freight Village	Excavation, vibration, cutting and filling, construction of buildings	Finding/disturbance to and/or destruction of unexpected non-Aboriginal heritage items.
Construction of upgrades to Moorebank Avenue, including diversion road	Excavation, vibration, cutting and filling	Finding/disturbance to and/or destruction of unexpected non-Aboriginal heritage items.
Installation of signals, signs and lights and general finishing works	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.	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 of the Development site	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.



### **3.3. Cumulative Impacts**

Assessment of potential cumulative Aboriginal heritage and non-Aboriginal heritage was undertaken as part of the preparation of the MPE Concept Plan EIS and included in Section 19 of the MPE Stage 2 EIS.

#### **3.3.1. Aboriginal Heritage**

The previous and existing activities undertaken on the MPE Site by the Department of Defence have resulted in a high level of disturbance to the site. It is likely this is the case for the MPW site. Excavation of the MPE Site and introduction of fill to the MPE Site has caused significant detrimental impact to any existing land surface and/or soil profile (and any associated Aboriginal objects) that may have been present within the MPE and MPW sites.

Overall, it is concluded that the cumulative impacts on Aboriginal heritage of the MPE and MPW Developments are negligible with the implementation of appropriate mitigation measures outlined in Section 3.4.

#### **3.3.2. Non-Aboriginal Heritage**

Construction of the MPE and MPW Developments would result in a loss of heritage structures and subsequent loss of heritage context in place on both sites. The MPE Concept Plan committed to consultation with Department of Defence during the approvals process to align both the MPE and MPW Developments in the management of non-Aboriginal heritage items as far as practicable.

Works on the MPE Site would be aligned to any divestment strategy of the Department of Defence during their relocation from the MPE Site, taking into consideration all heritage items with the MPE Site and the vicinity of the MPE Site and maintaining the heritage significance through the implementation of mitigation measures outlined in Section 3.4.

### **3.4. Management Measures**

This section describes the overall approach to managing and mitigating Aboriginal and non-Aboriginal heritage risks during construction of the Development. The management measures in Table 3-5 are based on the FCMM, provided as part of the consolidated assessment clarification responses issued on 10 December 2017, and the Minister's CoCs, as well as the requirements and standards of LOGOS, the Contractor and best practice.

Table 3-5 Management Measures

ID	Management Measure	Timing	Responsibility	Reference
<b>Staff Awareness</b>				
HM1	<p>All site staff, including subcontractors must attend an induction which details locations and types of heritage sites, legislation and other Development 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 of the induction will include site identification, materials likely to be uncovered, and requirement to notify the Contractor's 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 Development filing system.</p>	Pre-construction	All personnel	<p>FCMM 9c</p> <p>CoC 93 (b)</p>
<b>Site Planning</b>				

ID	Management Measure	Timing	Responsibility	Reference
HM2	Archival recordings shall be completed for all heritage listed structures on the site prior to the commencement of construction.	Completed	Contractor's EM and Development Heritage Consultant	CoC B91
HM3	<p>The Heritage Interpretation Plan (HIP) will be developed during construction in consultation with Heritage NSW, Liverpool City Council, relevant landowners and stakeholders including Moorebank Heritage Group, Department of Defence, and RAPs, in accordance with the Heritage Interpretation Strategy (HIS). It will be submitted for approval prior to the commencement of operation and will outline appropriate interpretive measures to be implemented.</p> <p><i>Note that this is a separate document to this CHMP.</i></p>	During construction	Principal's Representative	<p>FCMM10C</p> <p>CoC B101 and B102</p> <p>MPW C'th CoA 11 (b)</p>
HM4	<p>Plan construction activities to ensure that they remain within the construction boundary as identified in Figure 1-1.</p> <p>Where activities may need to extend beyond the site boundary, additional heritage investigations will be undertaken to identify and manage any additional heritage items that may occur in these areas and to ensure that these items are not harmed, modified or damaged in any way. Additional investigations will include the relevant stakeholders such as the Gandangara and/or Tharawal Local Aboriginal Land Councils as well as Liverpool City Council</p>	Prior to construction	<p>Site Supervisor</p> <p>Contractor's CM</p> <p>Contractor's EM</p>	<p>CoC B93 (c)(i)(ii)</p> <p>CoC B93(c)(iv)</p> <p>FCMM 9C</p>

ID	Management Measure	Timing	Responsibility	Reference
HM5	Environmental control maps (ECMs) will be developed clearly identifying Aboriginal and non-Aboriginal heritage sites on and in close proximity to the Development.	Prior to construction	Contractor's EM	CoC B93 (c)(i)(ii)
HM6	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.	Completed	Principal Representative	NSW Heritage Council Request
<b>Exclusion Zones and Monitoring</b>				
HM7	A 10m exclusion zone (e.g. high visibility fencing, signage) will be maintained around isolated find 2, 3, and 4 and any unexpected archaeological (historic and Aboriginal) sites that are identified requiring management under the SSD. Signage and restricted access to heritage structures within the Construction footprint will be erected.	Prior to construction	Site Supervisor Development Heritage Consultant Contractor's EM	CoC B96 FCMM 9A
HM8	Archaeological monitoring will be undertaken for a representative sample of the sites (PADs V and W) of former structures which have been assessed as having the potential to have local heritage significance. This is anticipated to have been completed prior to construction.	Complete	Contractor's EM Development Heritage Consultant	FCMM 10B CoC B93 (a) CoC B94

ID	Management Measure	Timing	Responsibility	Reference
	<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 Criteria for the assessment of Excavation Directors.</p> <p>The archaeologist would assess the likely significance of any archaeological deposits encountered, and provide advice regarding appropriate further action. An archaeological report will be submitted to the Secretary within one month of the completion of the monitoring.</p>			CoC B95
HM9	No access through fenced heritage sites. These are considered exclusion zones.	All times	All personnel	Best Practice
HM10	No works to occur outside the Development construction boundary.	All times	All personnel	RSoC 2.0 (Heritage)
HM11	Contractor's EM to undertake weekly inspections and monitoring of construction activities to ensure compliance 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	Contractor's EM Site Supervisor	CoC B93 (a)

ID	Management Measure	Timing	Responsibility	Reference
HM12	Archaeological surveys directed by a qualified archaeologist will be undertaken for any construction area not included within the Development. 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 Development site, additional approvals under the Heritage Act 1977 may be required.	During construction	Contractor's EM	CoC B93 (c) (i)
<b>Procedures for Unexpected Finds</b>				
HM13A	If an item (or suspected item) of Aboriginal heritage significance is discovered, the Unexpected Heritage Finds Protocol will be implemented (Section 3.4.1). All work in the area of the find will cease immediately and the Site Supervisor, Contractor's EM and Contractor's CM will be notified immediately. A 10m exclusion zone around the item must be erected. Any sand/soils removed will be identified and set aside for assessment. The Principal's Representative and the Development Heritage Consultant will be notified immediately. The Principal's Representative will contact OEH immediately. The Development Heritage Consultant is to assess the area to determine whether an Aboriginal site is present. If the item is confirmed to be of Aboriginal heritage significance, the Development Heritage Consultant, in consultation with the RAPs and OEH, must record the location and attributes of the site, determine the significance of the find, and determine appropriate mitigation measures and register the site on AHIMS.	Ongoing during construction	All personnel	CoC B93(c) iii CoC B93(c) iv CoC B97 CoC B99 CoC 100 MPW C'th CoA 11 (b)

ID	Management Measure	Timing	Responsibility	Reference
	<p>Works can only recommence if directed by the Principal's Representative when the following have been satisfied:</p> <ul style="list-style-type: none"> <li>• The object or place is confirmed by OEH upon consultation with the Registered Aboriginal Parties, not to be an Aboriginal object or Aboriginal Place; or</li> <li>• An Aboriginal Cultural Heritage Management Plan is prepared in consultation with the Registered Aboriginal Parties and OEH and the plan is approved by the Secretary</li> <li>• OEH is satisfied with the measures implemented.</li> </ul> <p>An assessment of consistency will also be undertaken by the Principal's Representative and the Development Heritage Consultant if the item is confirmed to be of Aboriginal heritage significance.</p>			
HM13B	<p>If an item (or suspected item) of non-Aboriginal heritage (including any archaeological 'relic' such as artefact bearing deposits directly linked to early occupation of the site) is discovered, the Unexpected Heritage Finds Procedure will be implemented (Section 3.4.1). All work in the area of the find will cease immediately. The Site Supervisor, Contractor's EM and Contractor's CM will be notified immediately, and a 10m exclusion zone around the item must be erected. Any sand/soils removed will be identified and set aside for assessment.</p> <p>The Development Heritage Consultant must be notified to record the location and attributes of the site, determine the significance of the find, assess any impacts or potential</p>	Ongoing during construction	All personnel	CoC B97

ID	Management Measure	Timing	Responsibility	Reference
	<p>impacts against the already approved Development impacts and determine appropriate management measures.</p> <p>Where unexpected finds are assessed by the Development Heritage Consultant and determined not to constitute a previously unknown heritage item or evidence of heritage value and/or be of local or state heritage significance, then works shall recommence in accordance with the CEMP (including this CHMP).</p> <p>For any newly discovered historical archaeological sites and relics that are assessed by the heritage professional to be of local or state significance, the OEH Heritage Division ((02) 9873 8500), NSW Heritage Council and the Secretary shall be notified under Section 146 of the Heritage Act, 1977.</p> <p>Works can only recommence once approval has been provided by DPE.</p> <p>An assessment of consistency will be undertaken by the Principal's Representative and the Development Heritage Consultant if the item is confirmed to be Non-Aboriginal heritage.</p>			
HM14	<p>If human remains are encountered works in the vicinity must cease immediately and the area will be secured. The Secretary, NSW Police, OEH and Aboriginal Stakeholders must be notified. Works will not recommence until authorised by OEH and NSW Police</p>	Ongoing during construction	All personnel	CoC B98

## Incident Management



ID	Management Measure	Timing	Responsibility	Reference
HM15	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 personnel	CoC C7 (e) Best Practice
<b>Reports and Records</b>				
HM16	Meeting minutes will be kept for meetings with regulatory bodies such as the ER, EPA and OEH.	Ongoing during construction	Contractor's EM	Best Practice
HM17	A summary of compliance with this procedure will be provided in the Development Monthly Report	Ongoing during construction	Contractor's EM	CoC C7 (h) Best Practice
<b>Post – Construction Works</b>				
HM18	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 Representative	Heritage Council of NSW Request

### **3.4.1. Unexpected Finds Protocol**

#### **3.4.1.1. Aboriginal heritage**

Given the extensive historical disturbance within the Development, 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 steps identified in Figure 3 10 should be followed. Works can only recommence if:

1. The object or place is confirmed by OEH upon consultation with the Registered Aboriginal Parties, not to be an Aboriginal object or Aboriginal Place; or
2. An Aboriginal Cultural Heritage Management Plan is prepared in consultation with the Registered Aboriginal Parties and OEH to include the object or place and appropriate measures in respect of it, and the Plan is approved by the Secretary; or
3. OEH is satisfied as to the measures to be implemented in respect of the object or place and makes a written direction in that regard.

Reporting of newly discovered sites must be prepared in accordance with statutory requirements and best practice professional standards.

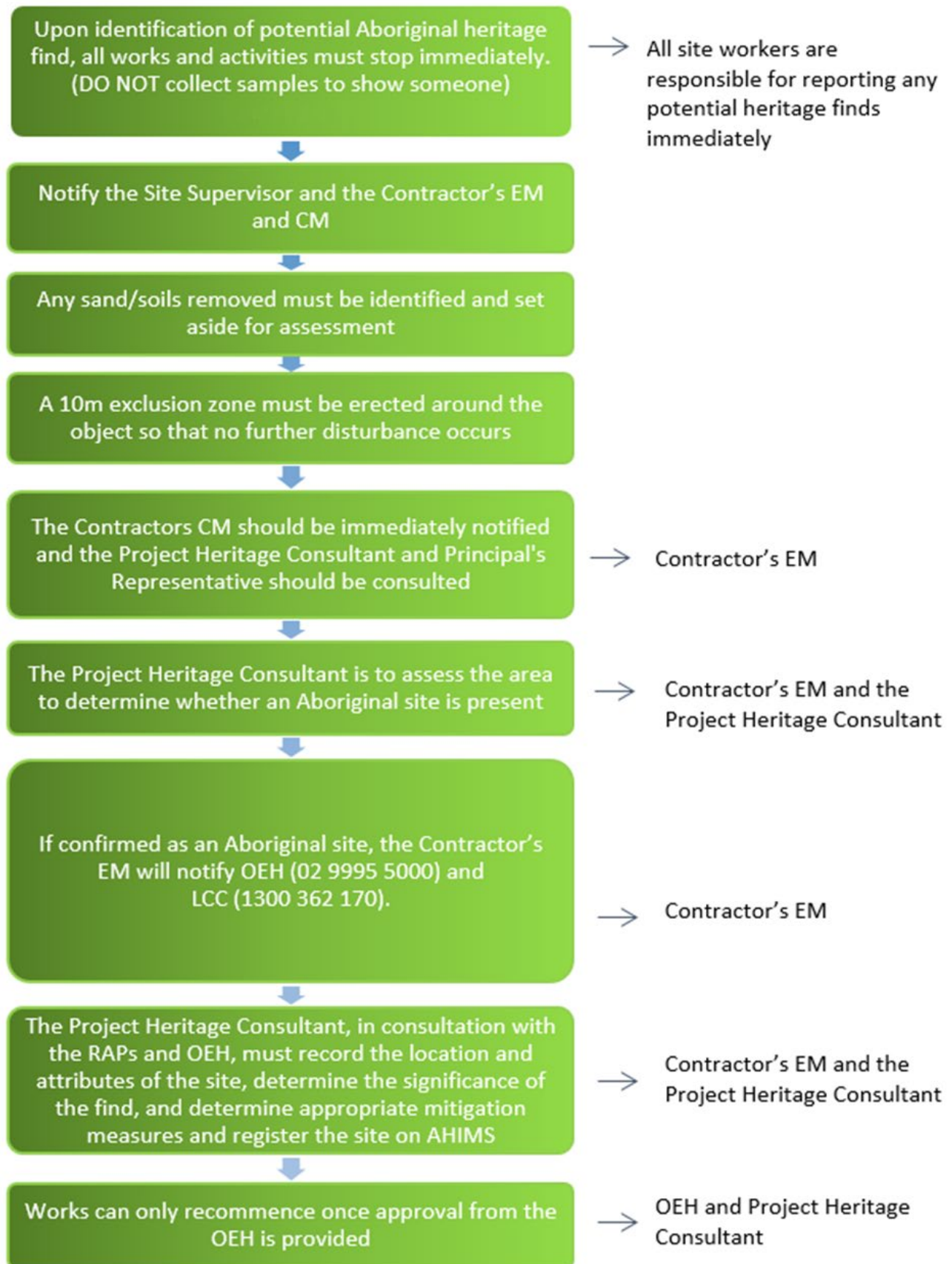


Figure 3-10 Unexpected Finds Procedure (Aboriginal Heritage)

#### 3.4.1.2. 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.

Not all features can be seen on each stone tool and some require an experienced eye to identify them. Breakage can remove key features.

#### 3.4.2. Skeletal Remains

In the event of the discovery of human skeletal material (or suspected human skeletal material) during Development activities the steps shown in Figure 3 11 must be followed.

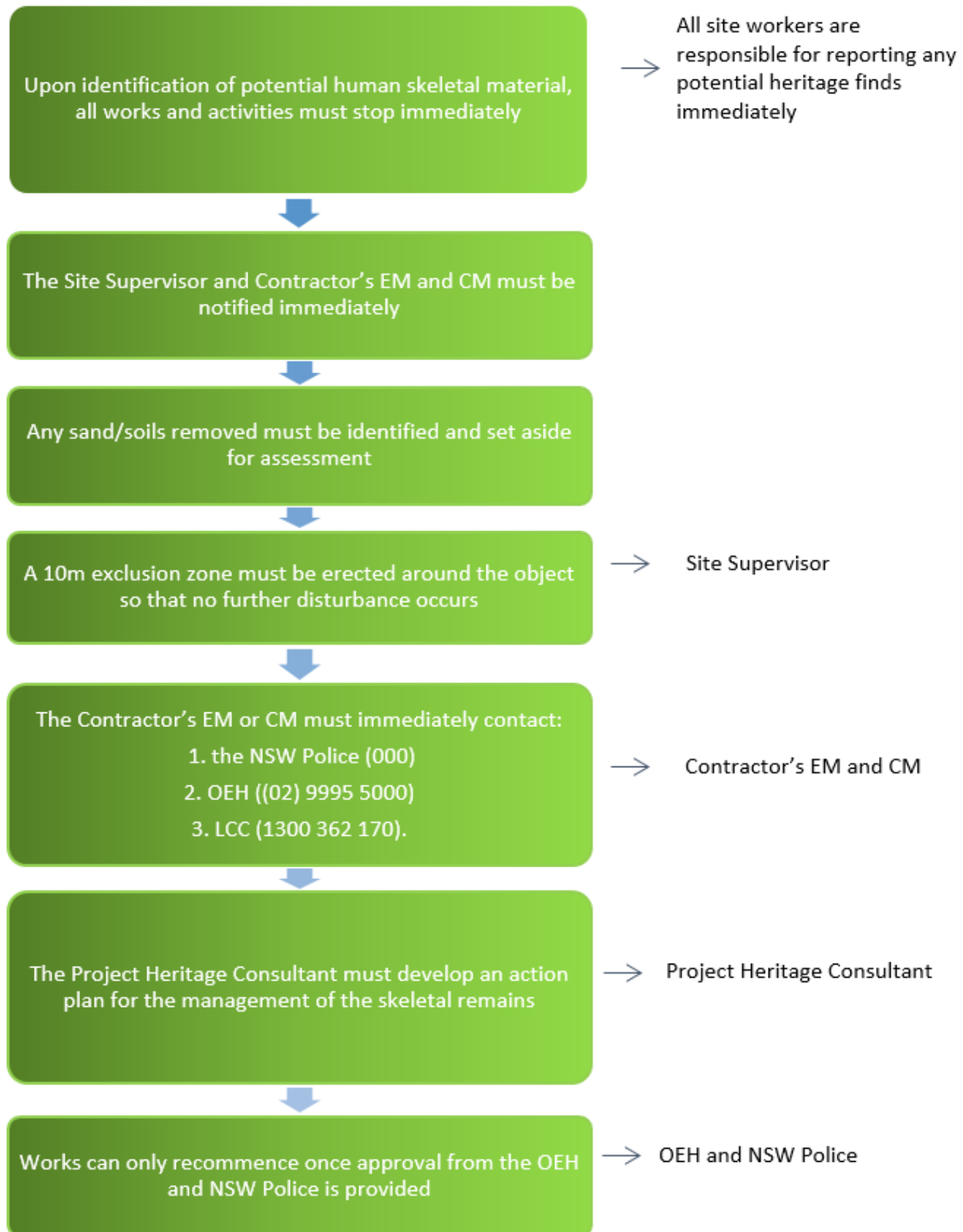


Figure 3-11 Unexpected Finds Procedure (skeletal material)

### 3.4.3. Non-Aboriginal Heritage

If unexpected finds are located during works the non-Aboriginal Unexpected Finds Procedure, shown in Figure 3 12, will be implemented.

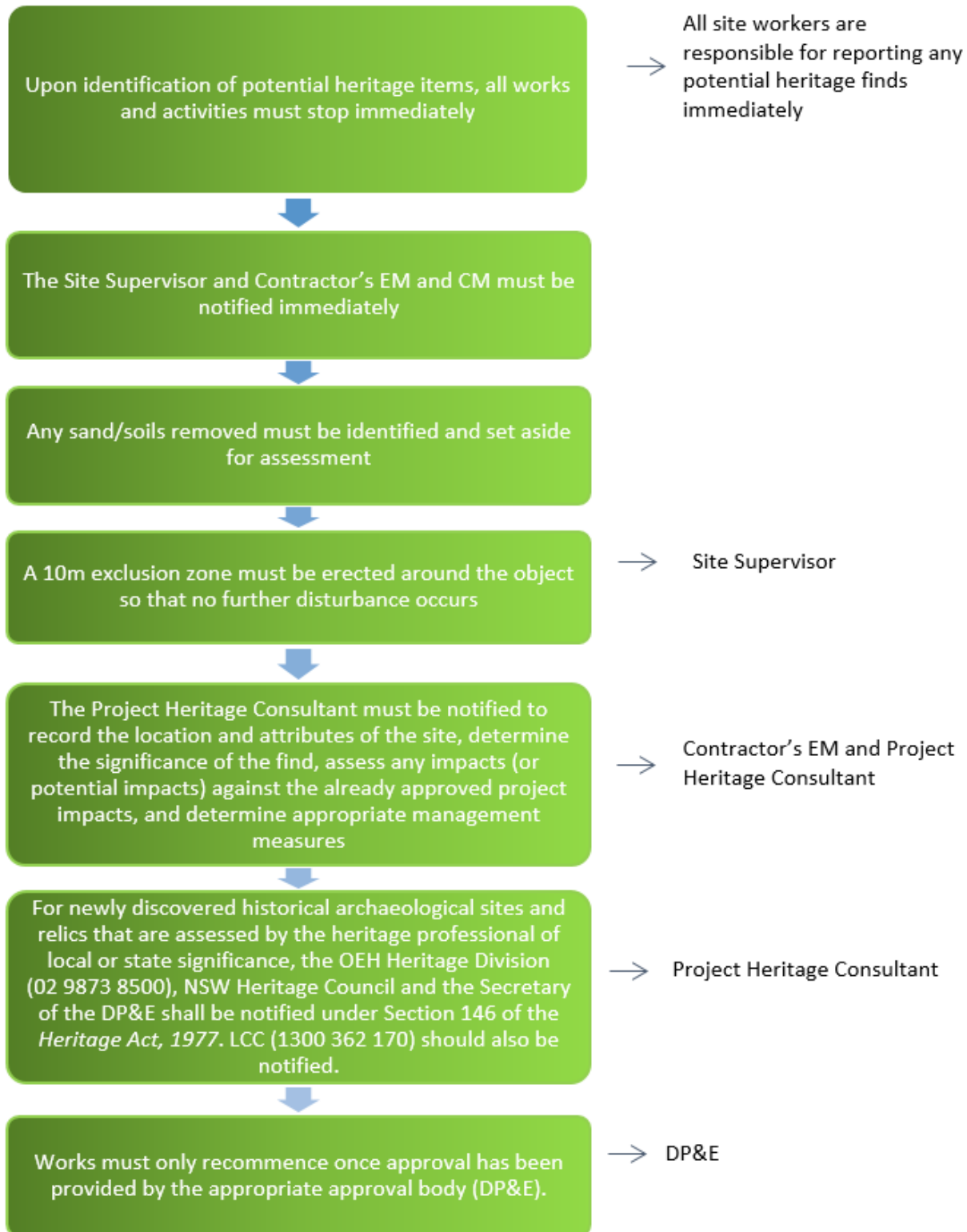


Figure 3-12 Unexpected Finds Procedure (Non-Aboriginal Heritage)

*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 14 as having low research potential as these have already been captured within the development consent 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.*

*Where unexpected finds are assessed by the Development Heritage Consultant and determined not to constitute a previously unknown heritage item or evidence of heritage value and/or be of local or state heritage significance, then works shall recommence in accordance with the CEMP (including this CHMP).*

#### 3.4.4. 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
- Relics linked to early occupation of the site.

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

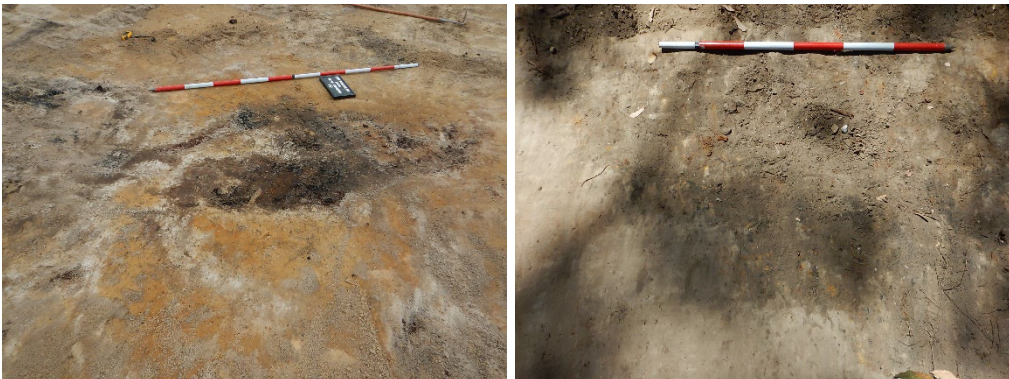


Figure 3-13 Rubbish pit



Figure 3-14 Brick pit





Figure 3-15 Post hole



Figure 3-16 Foundation



## **4. Monitoring and Review**

### **4.1. Environmental Monitoring**

Monitoring under this plan is to be undertaken by the Contractor's EM during weekly inspections of construction activities to monitor compliance with the requirements of the CoCs and this CHMP. Weekly inspections are to focus on the following key issues:

- Maintenance of exclusion zones around identified Aboriginal sites
- Adherence to the approved Development boundary in regard to heritage
- Weekly inspections are to be undertaken throughout construction.

An Environmental Inspection Checklist is to be used to maintain compliance and effectiveness of controls and to record the effectiveness of those controls to manage impacts. Items that require action are to be documented during environmental inspection and notified to the site supervisor, and if compliance is not maintained through existing controls supplementary controls are to be implemented. The Contractor's Works PackageM is 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 and maintenance of controls are to be made by the Site Supervisors and maintenance is to be recorded in site diaries.

### **4.2. Environmental Auditing and Reporting**

Auditing and reporting of the Development is to be undertaken in accordance with the CEMP.

The Contractor's EM is to undertake weekly inspections and monitoring of construction activities to ensure effectiveness of controls, compliance with the requirements of the CoCs and this plan.

Items that require action are to be documented on the site environmental inspection checklist. The Contractor's CM is 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 are to be made by the Site Supervisor and maintenance works recorded in site diaries during active site works.

### **4.3. Review and Improvement**

Review (both annually and intermittently) and improvement of this plan are to be undertaken in accordance with the CoCs and Section 1.2.7 of the CEMP. Continuous improvement will be achieved by the ongoing evaluation of environmental management performance and effectiveness of this plan against environmental policies, and the objectives and targets identified in Section 1.6.

Revision of this plan is to be undertaken in accordance with Section 1.2.7 of the CEMP.

A copy of the updated plan and changes is to be distributed to all relevant stakeholders in accordance with the approved document control procedure.

#### **4.4. Incidents**

An environmental incident is an incident or set of circumstances resulting in harm, or potential harm, to the environment. Environmental incidents may include disturbance or damage to a known heritage item or place. All environmental incidents are to be managed and reported in accordance with Section 2.8 of the CEMP. Section 2.8 of the CEMP includes an environmental incident response flowchart, that demonstrates how incidents are to be responded to and managed.

#### **4.5. Non-compliances, Non-conformances and Actions**

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

Non-compliances, non-conformances and corrective and preventative actions are to be managed in accordance with Section 4.4 of the CEMP.

#### **4.6. Complaints**

Complaints may be received directly from stakeholders to members of the Development team, or indirectly via the 24-hour Development information line, email address or postal address. Complaints are to be managed in accordance with Section 2.6.3 of the CEMP and Section 3.3.6 of the Community Communication Strategy. Section 3.3.6 of the Community Communication Strategy indicates who the 24 hour contact of the Development is, provides details on the complaints register and how disputes are to be resolved.

#### **4.7. Ongoing Consultation**

Ongoing consultation is to be undertaken with RAPs, in particular Tharawal Local Aboriginal Land Council, throughout construction as follows:

- Where changes to the Development may have implications for Aboriginal heritage management
- Methodologies for any future investigations
- 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 are to be communicated no later than one week after the issue arises.

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 is to be provided as part of the request. Where no response is issued within this timeframe, a follow-up phone call is to be made by the Principal's Representative to close out the outstanding request.

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

## 5. 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.
- Artefact Heritage (2016a) MPE Stage 2 Aboriginal Heritage Assessment. Report to Arcadis.
- Artefact Heritage (2016b) MPE Stage 2 Non-Aboriginal Heritage Assessment. Report to Arcadis.
- Artefact Heritage (2017) Moorebank Precinct East: Heritage Interpretation Strategy Report to Arcadis.
- 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.

## **APPENDIX A DEVELOPMENT CONSENT COMPLIANCE MATRICES**

### **State Approvals**

The Development is being delivered under Part 4, Division 4.1 (now Division 4.7) of the EP&A Act. The CoCs include requirements to be addressed in this plan and delivered during the Development. These requirements and how they are addressed along with division of responsibilities is provided within Table A-1.

Table A-1 Conditions of Consent

CoC	Requirement	Document Reference	How Addressed
A1	In addition to meeting the specific performance measures and criteria established under this consent all reasonable measures must be implemented to prevent, and if prevention is not reasonable, minimise, any harm to the environment that may result from the construction and operation of the development, and any rehabilitation required under this consent.	Section 3 Table 3-5 Section 4	Section 3, Table 3-5 of this CHMP identifies the management measures to be implemented to prevent and minimise environmental harm.  Section 4 sets out the process for monitoring and review of the effectiveness of these measures. Opportunities to further minimise environmental harm will be identified through the ongoing evaluation of environmental management performance and effectiveness of this plan
A2	<p>The development may only be carried out:</p> <p>(a) in compliance with the conditions of this consent;</p> <p>(b) in accordance with all written directions of the Secretary in relation to this consent;</p> <p>(c) in accordance with the EIS, Submissions Report and MPE Stage 2 (SSD-7628) – Consolidated assessment clarification responses and updated Biodiversity Assessment Report;</p> <p>(d) in accordance with all Modification Assessments (if any);</p> <p>(e) in accordance with the amended development layout to be submitted for the Secretary's approval as part of this consent; and</p> <p>(f) in accordance with the management and mitigation measures at APPENDIX B of this consent.</p>	<p>(a), Appendix A</p> <p>(b) N/A</p> <p>(c) Appendix A</p> <p>(d) N/A</p> <p>(e) Appendix A</p>	This plan has been developed to comply with the CoCs, written directions to the Secretary, amended development layout and management and mitigation measures outlined in Appendix B of the CoCs.

CoC	Requirement	Document Reference	How Addressed
A15	If submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program.	Section 1.6	Section 1.6 addresses the staging of the Project. The CHMP supersedes the EWHMP and is relevant to the construction phases
A19	<p>Where conditions of this consent require a document to be prepared in consultation with an identified party, the Applicant must:</p> <p>a) Consult with relevant party prior to submitting the subject document to the Secretary for approval;</p> <p>b) Provide evidence that at least two weeks was provided for the relevant party to comment on the document; and</p> <p>c) Include in the document:</p> <p>i. Details of the consultation undertaken</p> <p>ii. A description of how matters raised by those consulted have been resolved to the satisfaction of both Applicant and the party consulted; and</p> <p>Details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.</p>	<p>Section 1.8</p> <p>Appendix B</p>	<p>a) Section 1.8 indicates that consultation has been undertaken with NSW Heritage Division, Liverpool City Council, Moorebank Heritage Group, Department of Defence.</p> <p>b) Section 1.8 indicates that at least two weeks has been given to stakeholders to provide comments on the EWHMP.</p> <p>(c)(i) Section 1.8 and Appendix B provides details on the consultation undertaken.</p> <p>(ii) Appendix B describes how issues raised by stakeholders were resolved to the satisfaction of stakeholders by SIMTA.</p> <p>(iii) To date, there have been no disagreements.</p>
A20	All licences, permits, approvals and consents as required by law must be obtained and maintained as required for the development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits, approvals and consents.	<p>CEMP - Section 2.5.2</p> <p>Section 2.1</p>	<p>All applicable licences, permits and approvals will be obtained as required.</p> <p>Approvals, permits and licences required for the Project are discussed in the CEMP in Section 2.5.2.</p>

CoC	Requirement	Document Reference	How Addressed
			An Environmental Protection Licence (EPL) (No. 21054) was issued by the EPA on 4 June 2018. The Licence applies to the Moorebank Precinct areas identified in condition A2.2, scheduled activities include crushing, grinding or separating, and contaminated soil treatment. The Licence enables the importation of material classified under a Resource Recovery Order where the onsite use (approved land use) is consistent with the applicable Resource Recovery Exemption.
B91	Prior to Early Works and Fill Importation, archival recording of the entire former DNSDC site must be undertaken in accordance with the Non-Indigenous Heritage Assessment (artefact, 2016) by a suitably qualified and experienced person(s).	Table 3-5 (HM2)	Table 3-5 HM2 states that a Project Heritage Consultant completed archival recordings for all heritage listed structures on the site prior to the commencement of construction of MPE Stage 1 as required by CoC C13 of SSD14-6766. The archival recordings were submitted as a soft copy to DP&E on 08/06/17 with hardcopies posted at the end of June and received by 05/07/17.
B92	Prior to commencement of Early Works and Fill Importation, the Applicant must prepare a Heritage Management Plan, to the satisfaction of the Secretary. The plan must form part of the CEMP required by C3 and must:  (a) be prepared by suitably qualified and experienced person(s);	This plan (Cover Page)	This document was prepared by Sandra Wallace of Artefact Heritage. Details are provided on the front page.
	(b) be prepared in consultation with NSW Heritage Division, Council, relevant landowners and stakeholders including the Moorebank Heritage Group (MHG) and Department of Defence.	Section 1.8 Table 1-4 Appendix B	Section 1.8 summarises consultation undertaken during preparation of the CHMP. Evidence of consultation, i.e. correspondence, is provided in Appendix B.

CoC	Requirement	Document Reference	How Addressed
B93	The Heritage Management Plan must include: (a) plans/strategies to monitor, mitigate and manage the effects of the development on identified PADs;	Table 3-5 Item HM8	Monitoring, mitigation and management plans/strategies for impacts on identified PADs (particularly PADs V and W) is discussed through Sections 3 and 4 of this document. Monitoring of PADs is complete. No further monitoring has been recommended for PADs V and W
	(b) measures to ensure site workers receive suitable heritage inductions prior to carrying out any activities which may cause impacts to heritage, and that suitable records are kept of these inductions;	Section 2.3 Table 3-5 Item HM1	Section 2.3 and Table 3-5 item HM1 details suitable heritage induction measures and records of training protocol for site workers.
	(c) a program and description of the measures/procedures to be implemented for: (i) undertaking surface surveys and archaeological investigations (where subsurface disturbance is proposed) of any items of heritage significance;	Section 0 Table 3-5 Item HM12 Appendix C	Measures for the management of PADs are discussed in Table 3-5 and are detailed in the Archaeological Monitoring Strategy prepared for the works. Monitoring of PADs V and W is complete. No further monitoring has been recommended for PADs V and W.
	(c) a program and description of the measures/procedures to be implemented for: (ii) protecting heritage items located outside the disturbance area from the impacts of the development;	Table 3-5 Item HM4, HM5, HM 10 and HM11	HM4, HM5, HM 10 and HM11 addresses the protection requirements of heritage items located outside the Project boundary.
	(c) a program and description of the measures/procedures to be implemented for: (iii) managing any new heritage items discovered during the development; and	Table 3-5 Item HM13A and HM13B Section 3.4.1	New heritage items will be considered to be unexpected finds. HM13A and HM13B and Section 3.4.1 details management actions and responsibilities for unexpected finds.
	(iv) additional archaeological excavation and recording of any significant heritage deposits uncovered during demolition.	Table 3-5 Item HM13A and HM13B Section 4	Any heritage items uncovered during the demolition of buildings would be treated as an unexpected find and



CoC	Requirement	Document Reference	How Addressed
			managed in accordance with HM13A and HM13B Section 3.4.1
B94	Prior to commencement of Early Works and Fill Importation, archaeological monitoring and recording must be undertaken at potential archaeological deposits (PADs) V and W in accordance with the Non-Indigenous Heritage Assessment (Artefact 2016) by a suitably qualified and experienced archaeologist with Excavation Director Criteria qualifications	Table 3-5 16 Item HM8 Appendix C	Table 3-5 HM8 details action on archaeological monitoring and recording in accordance to an Archaeological Method Statement (AMS) prepared by an experienced Excavation Director. Monitoring of PADs V and W was undertaken prior to the commencement of Early Works. No further monitoring has been recommended for PADs V and W.
B95	The results must be reported to the Secretary within one month of completion of monitoring and recording at PADs V and W, along with recommendations for further monitoring at additional sites, if significant archaeological deposits are encountered.	Table 3-5 Item HM8	<p>A report entitled 'Summary of Excavation Results and Future Management – Moorebank Precinct East (MPE) PADs V and W' dated 16 April 2018, was submitted to the Secretary on 18 April. The submission date was within one month of completing the monitoring and recording (which was undertaken on 19-21 March 2018).</p> <p>No significant archaeological deposits were found. The report concludes there is no need for any further testing around PADs V and W and that no further monitoring is required at additional sites</p>
B96	Fill importation must not commence within 10 metres of PADs V and W until the results of any further monitoring and recording, along with any additional Non-Indigenous Heritage management measures, are submitted to the Secretary and included in an updated Heritage Management Plan to the satisfaction of the Secretary.	Table 3-5 Item HM7	<p>The report 'Summary of Excavation Results and Future Management – Moorebank Precinct East (MPE) PADs V and W' dated 16 April 2018, was submitted to the Secretary on 18 April.</p> <p>The report concludes there is no need for any further testing around PADs V and W and recommends that restrictions within 10 m of PADs V and W can be removed. There are no recommendations for further monitoring at additional sites.</p>

CoC	Requirement	Document Reference	How Addressed
			This plan has been updated to reflect these recommendations.
B97	Before commencement of construction, the Applicant must prepare an Unexpected Finds Protocol for the development in consultation with the Registered Aboriginal Parties, OEH and the NSW Heritage Division and must implement the Protocol in accordance with its terms.	Section 1.8 Appendix A Section 3.4.1	Section 1.8 and Appendix A identifies consultation undertaken for this plan.  The Unexpected Finds Protocol in Section 3.4.1 has been consulted upon with the Registered Aboriginal Parties separately to this plan. OEH (NSW Heritage Division) have commented on the Unexpected Finds Protocol through the broader review of this document. Consultation with OEH is recorded in Section 1.8 and Appendix A.
B98	If human remains are discovered on site, then all work surrounding the area must cease, and the area must be secured. The Applicant must immediately notify NSW Police and OEH, and work must not recommence in the area until authorised by NSW Police and OEH.	Table 3-5 Item HM14 Section 3.4.2	Table 3-5 HM14 and Section 3.4.2 identifies the process to be undertaken if human remains are uncovered and that works in the vicinity must cease immediately, and NSW police and OEH must be notified. Works will not recommence until authorised by OEH and NSW Police.
B99	If any Aboriginal object or Aboriginal place is identified on site, or suspected to be on site:  (b) all work in the immediate vicinity of the object or place must cease immediately;  (i) a 10m buffer area around the object or place must be cordoned off; and  (j) OEH must be contacted immediately	Table 3-5 Item HM13A	Details of action for any Aboriginal object or Aboriginal place encountered is described in Table 3-5 HM13A
B100	Work in the immediate vicinity may only recommence if:	Section 3.4.1 Table 3-5 Item HM13A	The condition is addressed as part of the Unexpected Finds Protocol in Section 3.4.1. Actions detailed in Table 3-5 HM13A.

CoC	Requirement	Document Reference	How Addressed
	<p>(a) the object or place is confirmed by OEH upon consultation with the Registered Aboriginal Parties, not to be an Aboriginal object or Aboriginal Place; or</p> <p>(b) an Aboriginal Cultural Heritage Management Plan is prepared in consultation with the Registered Aboriginal Parties and OEH to include the object or place and appropriate measures in respect of it, and the Plan is approved by the Secretary; or</p> <p>(c) OEH is satisfied as to the measures to be implemented in respect of the object or place and makes a written direction in that regard.</p>		
B101	<p>Prior to commencement of operation, the Applicant must prepare a Heritage Interpretation Plan based on the recommendations contained in the Heritage Interpretation Strategy (artefact, 2017) approved under MPE Stage 1. The plan must be prepared for the entire Moorebank Intermodal Precinct (MPE and MPW sites).</p>	Table 3-5 Item HM3	An HIP will be developed prior to commencement of operation
B102	<p>The plan must form part of the OEMP required by condition C3 and must:</p> <p>(a) be prepared by a suitably qualified and experienced person(s);</p> <p>(b) be prepared in consultation with NSW Heritage Division, Council, relevant landowners and stakeholders including the Moorebank Heritage Group (MHG), Department of Defence, as well as the Relevant Aboriginal Parties (RAPs) should themes relating to Aboriginal heritage be included for interpretation; and</p> <p>(c) be approved by the Secretary prior to the commencement of operation.</p>	Table 3-5 item HM3	The HIP will be developed during construction in line with the recommendations made in the Heritage Interpretation Strategy and submitted for approval prior to the commencement of operations. The requirements and recommendations of the HIP will be incorporated into the OEMP prior to commencement of operations

CoC	Requirement	Document Reference	How Addressed
C7	The Applicant must ensure that the environmental management plans required under this consent are prepared in accordance with any relevant guidelines, and include:  (a) detailed baseline data;	Table 2-1 Section 3.1	Table 2-1 details how this plan has been developed in accordance with DIPNR guidelines.  Section 3.1 details relevant data related to Aboriginal and Non-Aboriginal items within and surrounding the Project site.
	(b) a description of:  (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);  (ii) any relevant limits or performance measures/criteria; and  (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;	Section 1 Section 2.1 Section 1.7 Table 1-3	(i) Section 1 provides information on the approvals required for the Project site. Section 2.1 lists the environmental obligations for the Project site.  (ii) Section 1.7 details the performance measures/criteria (objectives).  (iii) Table 1-3 under Section 1.7 details the performance indicators (targets).
	(c) a description of the management measures to be implemented to comply with the relevant statutory requirements, limits or performance measures/criteria;	Section 3.4 Table 3-5	Section 3.4 Table 3-5 stipulates the management measures for construction.
	(d) a program to monitor and report on the:  (i) impacts and environmental performance of the development; and  (ii) effectiveness of any management measures (see (c) above);	Section 4.1 Section 4.3	(i) Program on monitoring and reporting of impacts and environmental performance is discussed under Section 4.1.  (ii) Section 4.3 states ongoing evaluation on performance and effectiveness will be undertaken against policies, objectives and targets.
	(e) a contingency plan to manage any unpredicted impacts and their consequences;	Table 3-5 Item HM15	Incidents will be notified to the environments team and works within the vicinity will stop immediately as per the Unexpected Finds Protocol.

CoC	Requirement	Document Reference	How Addressed
	(f) a program to investigate and implement ways to improve the environmental performance of the development over time;	Section 4.3	Improvement measures are discussed under Section 4.3 through ongoing evaluation and effectiveness of the program.
	(g) a protocol for managing and reporting any:		(i) Section 4.4 indicates how incidents will be managed and reported.
	(i) incidents and non-compliances;	i) Section 4.4	
	(ii) complaints;	ii) Section 4.6	(ii) Section 4.6 indicates how complaints will be managed and reported.
	(iii) non-compliances with statutory requirements; and	iii) Section 4.5	(iii) Section 4.5 indicates how non-compliances will be managed and reported.
	(h) a protocol for periodic review of the plan.	Table 3-5Item HM17 Section 4.3	Table 3-5 HM17 states a summary of compliance will be provided in the Monthly Report.  Section 4.3 states that review and improvement of the plan will be undertaken annually and intermittently in accordance with the CoCs and Section 1.2.7 of the CEMP.  Further detail of the review process is provided in Section 4 of the CEMP.

The Final Compilation of Mitigation Measures (FCMMs) were prepared as part of the consolidated assessment clarification responses issued to DP&E on 10 November 2017. A list of the FCMMs as relevant to the Project and how they have been complied with in this plan are provided in Table A-2.

Table A-2 Final Compilation of Mitigation Measures

FCMM	Requirement	Document Reference	How Addressed
9A	An exclusion zone would be provided around previously identified MPE Isolated Artefacts 2, 3 and 4 (refer to Figure 16-2) to avoid potential disturbance of these artefacts during construction of the Amended Proposal.	Section 0	Section 0 (HM7) outlines that high visibility fencing will be installed at 10m around the Aboriginal isolated finds.
9B	Management of Aboriginal heritage would be included in the CEMP for the Amended Proposal. Information within the CEMP would include: <ul style="list-style-type: none"> <li>A summary of the findings of the Aboriginal Heritage Impact Assessment Report (provided at Appendix S of the EIS)</li> </ul>	Section 3.1	Section 3.1 summarises the existing environment of the Project, as well as the management measures recommended in the Aboriginal Heritage Impact Assessment Report.
	<ul style="list-style-type: none"> <li>Guidance on unexpected archaeological and cultural finds (including human remains).</li> </ul>	Section 0	Unexpected Finds Protocols have been provided in Section 0
9C	All relevant personnel and contractors involved in the design and construction of the Amended Proposal would be advised of the relevant heritage considerations, legislative requirements and recommendations in the Aboriginal Heritage Impact Assessment Report (provided at Appendix S of the EIS).	Section 2.3 Table 3-5 (HM1 and HM5)	Section 2.3 and Table 3-5 item HM1 detail induction and training requirements for Project personnel.  HM5 details Environmental control maps (ECM) that identify Aboriginal and non-Aboriginal heritage sites which will be used for site induction.
10A	<b>Non-Indigenous Heritage</b> A Heritage Management Plan in adherence to NSW Heritage Council guidelines would be prepared as part of the CEMP for the Amended Proposal	This Plan	This plan has been prepared in accordance with the NSW Heritage Council requirements as well as the requirements of the Conditions of Consent.
10B	Archaeological monitoring and recording would be conducted at PADs V and W, which have the potential to contain archaeological remains of local significance. Monitoring and recording would be undertaken by a suitably qualified archaeologist, who would assess the likely significance of any archaeological deposits encountered, and provide advice regarding appropriate further action. If highly significant remains were	Section 0 Table 3-5 (HM8)	Archaeological monitoring and recording was conducted at PADs V and W. No significant archaeological deposits were found. No further testing is required around PADs V and W and no further monitoring is required at additional sites

FCMM	Requirement	Document Reference	How Addressed
	identified during monitoring, it would be appropriate to conduct further monitoring for additional sites of former structures or test excavations		
10C	A Heritage Interpretation Strategy should be prepared prior to the commencement of construction, outlining appropriate interpretive measure for the Amended construction area in the context of the MPE Site as a whole.	Refer to Appendix D (Artefact 2016)	This was completed prior to the commencement of MPE Stage 1 (SSD14-6766) and has been included as Appendix D.
10D	If unexpected finds are located during works an archaeological consultant would be engaged to assess the significance of the finds and the NSW Heritage Council notified.	Section 3.4.1	Unexpected Finds Protocols are included in Section 3.4.1.

### EPBC Approvals

The EPBC Act approval for the MPE Concept was granted by the Department of the Environment in March 2014 (No. 2011/6229). This approval was provided for the impact of the MPE Project on listed threatened species and communities (Sections 18 and 18A of the EPBC Act) and Commonwealth land (Sections 26 and 27A of the EPBC Act).

The EPBC Act approval for the MPW Concept was granted by the Commonwealth Department of Environment and Energy (DotEE) in September 2016 (No. 2011/6086). This approval was provided for the impact of the MPW Project on listed threatened species and communities (Sections 18 and 18A of the EPBC Act) and Commonwealth land (Sections 26 and 27A of the EPBC Act).

The Moorebank Avenue upgrade works will be performed under the MPE Stage 2 Consent as described in Section 1.1 and 1.3 of the CEMP. Since the western side of the Moorebank Avenue upgrade works construction footprint is located in an existing area of hardstand within the MPW site, the works must comply with the MPW Commonwealth Approval.

The construction and operation of the Project has been designed to be consistent with the EPBC Act Approval conditions. EPBC Act Approval conditions applicable to this plan are identified in Table A-3.



Table A-3 Commonwealth Conditions of Approval

Condition	Requirement	Document Reference	How Addressed
<b>MPE EPBC Approval (2011/6229)</b>			
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	CEMP and this Plan	This plan forms a sub-plan to the 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 and Section 3.2 of this Plan	Section 3.2 details the potential impacts of construction on heritage.
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 (Artefact 2016)	This was completed prior to the commencement of MPE Stage 1 (SSD14-6766).
7g	Details of a comprehensive monitoring program (including locations, frequency and duration) for:  i. validating the anticipated impacts associated with condition 7(b); and  ii. determining the effectiveness of proposed mitigation/management measures	Section 4	Section 4 details the monitoring and review processes that will be undertaken as part of this Plan
7h	provisions to revise the approved CEMP in response to monitoring associated with condition 7(g) including, details of response	Section 1.2.7 of the CEMP Section 4.3 of this Plan	Section 1.2.7 of the CEMP details revision procedures of construction plans

Condition Requirement	Document Reference	How Addressed
contingency mechanisms to address any exceedances of the relevant trigger values;		Section 4.3 details how the CHMP will be reviewed and improved.
<b>MPW EPBC Approval (2011/6086)</b>		
Sections of the CEMP and OEMP relating to Aboriginal heritage must be prepared by a suitably qualified expert and must:	This Plan	This Plan is consistent with the Aboriginal Heritage Provisional Environmental Management Framework (2 July 2014),
11 a) be consistent with the Aboriginal Heritage Provisional Environmental Management Framework (2 July 2014), provided at Appendix 0 to the finalised EIS		
b) incorporate all measures 12A to 12G from Table 7.1 of the finalised EIS that are described as 'mandatory'	Refer to Section 3.4 and 4.7 Measure 12E is not applicable to the MPE Site.	Section 3.4(HM13A) details the Unexpected Finds Protocol Section 4.7 details the process of ongoing consultation with the RAPs
c) explain how all measures 12A to 12G from Table 7.1 of the finalised EIS that are described as 'subject to review' have been addressed	Refer to Appendix C Measures 12C and 12D are not applicable to the MPE Site.	Appendix C details approach to conserving heritage.
d) be approved by the Minister or a relevant New South Wales regulator.	This Plan	This Plan was approved by DPE on 15 June 2018.

## Other Approvals

The Revised Statement of Commitments (RSoC) includes the most recent compilation of SIMTA commitments to mitigate the environmental impacts, monitor the environmental performance and/or achieve a positive environmentally sustainable outcome. These RSoCs (June 2017) were presented in the Moorebank Precinct East – Concept Plan Modification 2 Response to Submissions. The RSoC that are relevant to this plan are identified in Table A-4.

Table A-4 Revised Statement of Commitments – MPE Project Concept Plan

RSoC	Requirement	Document Reference	How Addressed
<b>Aboriginal Heritage</b>			
2.0	Consultation between SIMTA and relevant Registered Aboriginal Parties (RAPs) throughout the design and construction of the SIMTA proposal	Section 1.8	Section 1.8 details the circumstances under which the RAPs will be contacted.
	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	This Plan has been developed to identify the means by which the works will avoid impacting any known Aboriginal heritage objects, sites or places and places that have potential Aboriginal heritage or cultural values.
	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 Table 3-5 (HM13A)	HM13A details protection of Aboriginal isolated finds.
	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 3-5 (HM10)	HM10 details that no works are to occur outside of the Project boundary.
	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 subsequent course of action in consultation with a heritage professional, relevant Registered	Section 3.4.1	Section 3.4.1 details the Unexpected Finds Protocol to be implemented should any potential Aboriginal objects, sites or places be identified.

RSoc	Requirement	Document Reference	How Addressed
	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 3.4.2	Section 3.4.2 details the procedure to be followed in the event human skeletal remains are uncovered.
	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 2.1	Section 2.1 details the legislative and other obligations that are to be adhered to in the development of any documentation pertaining to heritage
	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.	Refer to MPE Stage 1 CHMP. Not relevant to Stage 2.	
<b>Non-Indigenous Heritage</b>			
	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 2016b)	This was completed prior to the commencement of MPE Stage 1 (SSD14-6766).
	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 2016b)	This was completed prior to the commencement of MPE Stage 1 (SSD14-6766).
	Preparing a Statement of Heritage Impact for each stage, including the legal status of the site and advice on required actions	Refer to Heritage Assessment (Artefact 2016b)	This was completed prior to the commencement of MPE Stage 1 (SSD14-6766).

RSoC	Requirement	Document Reference	How Addressed
	depending on whether the site is listed or unlisted at the time that approval is sought.		
	Development of an overall mitigation strategy for the DNSDC site, which may be based on Table 3 of the Non-Indigenous Heritage report.	HIS has been prepared as part of MPE Stage 1 Project. The HIP will be progressed as part of the Project	
	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 2016b)	This was completed prior to the commencement of MPE Stage 1 (SSD14-6766).
	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 consultant archaeologist should be engaged to assess the item to determine its heritage significance.	Section 3.4.3	Section 3.4.3 details the procedures to be followed in the event of an unexpected find being uncovered.

Infrastructure Sustainability Council of Australia requirements relevant to this plan are detailed in Table A-5.

Table A-5 ISCA Requirements

Credit	Level	Requirement	Document Reference
Her – 2 Monitoring of Heritage		The contractor must ensure: Monitoring of heritage is undertaken at appropriate intervals during construction	Section 4
		Monitoring and modelling demonstrates maintenance of heritage values	Section 4
		Heritage is managed and reported to meet the requirements of the CEMP	Section 4

There are no specific conditions relating to Concept Plan Conditions of consent relating to Heritage Management.

## **APPENDIX B EVIDENCE OF CONSULTATION**

## **APPENDIX C ARCHEOLOGICAL MONITORING STRATEGY**



## **APPENDIX D MPE HERITAGE INTERPRETATION STRATEGY**