

# AUSTRAL ARCHAEOLOGY



## NEWCASTLE HIGH SCHOOL 25A NATIONAL PARK STREET, NEWCASTLE, NSW CONSTRUCTION HERITAGE MANAGEMENT SUB-PLAN

Prepared for Hansen Yuncken

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Final

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## **CULTURAL WARNING**

Aboriginal and Torres Strait Islander readers are advised that this report may contain images or names of First Nations people who have passed away.



**AUSTRAL**  
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# 1 INTRODUCTION

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## 1.1 CONTEXT

This Construction Heritage Management Sub Plan (CHMSP or The Plan) forms part of the Construction Environmental Management Plan (CEMP) for the Newcastle Education Campus Project (the Project).

This CHMSP has been prepared by Austral Archaeology Pty Ltd (Austral) to address the requirements of the Minister's Instrument of Consent (IoC) issued for the Project (SSD-41814831) and all applicable legislation.

## 1.2 BACKGROUND

This Project is being undertaken on behalf of the Department of Education, who have proposed the following works be undertaken:

*Staged upgrades to Newcastle High School comprising demolition, relocation and refurbishment of existing buildings, construction of new buildings, covered walkways, drop-off/pick up, waste and sporting facilities, tree removal, landscaping, and ancillary works including public domain infrastructure (SSD-41814831).*

The Project has been assessed as being a State Significant Development under Part 4 of the *Environmental Planning and Assessment Act 1979* (EPA Act). The Environmental Impact Statement (EIS) for the Project summarised the key findings of the assessment impacts to Aboriginal and Non-Aboriginal Heritage (Gyde 2023). It identified the potential for impacts on items of both Aboriginal cultural heritage and historical heritage values during construction of proposed works, and included a recommendation of mitigation measures to minimise these impacts. The EIS was supported by a Statement of Heritage Impact (SoHI) detailing potential impacts to built heritage items (EJE Heritage 2023), an archaeological assessment detailing potential impacts to historical archaeological items (EMM Consulting Pty Ltd 2023a), and an Aboriginal Cultural Heritage Assessment (ACHA) detailing potential impacts to Aboriginal cultural material (EMM Consulting Pty Ltd 2023b).

Hansen Yuncken (HY) has been engaged to undertake the various tasks required to complete the Project. This CHMSP describes the environmental management measures that HY will implement during the construction work in terms of built heritage and historical archaeological material. Consideration of impacts to Aboriginal cultural material is to be managed through a separate Aboriginal Cultural Heritage Management Sub-Plan.

## 1.3 ENVIRONMENTAL MANAGEMENT SYSTEMS OVERVIEW

The overall Environmental Management System for the Project is described in the CEMP. The CHMSP is part of the wider environmental management framework for the Project, as described in Section 4.7 of the CEMP.

In accordance with Condition B14 of the IoC, The CHMSP is to be approved by the Certifier as a component of the CEMP, and is to form part of the documentation given to the Planning Secretary for information purposes.

Management measures identified in this Plan will be incorporated into site or an activity specific Environmental Work Method Statement (EWMS) as required. EWMS will be developed if necessary and signed off by environment and management representatives prior to associated works commencing and construction personnel will be required to undertake works in accordance with the identified mitigation and management measures.

Used together, the CEMP, strategies, procedures and EWMS form management guides that clearly identify required environmental (including heritage) management actions for reference by HY personnel and contractors.

## 1.4 ABBREVIATIONS

The following are common abbreviations that are used within this report:

AA&MS	Archaeological Assessment and Management Strategy
ACHA	Aboriginal Cultural Heritage Assessment
ACHP	Aboriginal Cultural Heritage Plan
AER	Archaeological Excavation Report
ARD	Archaeological Research Design
ARR	Archival Recording Report
Austral	Austral Archaeology Pty Ltd
Burra Charter	<i>Burra Charter: Australia ICOMOS Charter for Places of Cultural Significance 2013</i>
CEMP	Construction Environmental Management Plan
CHMSP	Construction Heritage Management Sub-Plan
DoE S170 Register	Register of heritage items maintained by the Department of Education in accordance with Section 170 of the Heritage Act
EIS	Environmental Impact Statement
EPA Act	<i>NSW Environmental Planning and Assessment Act 1979</i>
EPBC Act	<i>Environmental Protection and Biodiversity Act 1999</i>
EWMS	Environmental Work Method Statement
HAA	Historical Archaeological Assessment
HCA	Heritage Conservation Area
HIP	Heritage Interpretation Plan
HY	Hansen Yuncken
IoA	Instrument of Approval
Heritage Act	<i>NSW Heritage Act 1977</i>
Newcastle LEP	<i>Newcastle Local Environmental Plan 2012</i>
NPW Act	<i>NSW National Parks and Wildlife Act 1974</i>
The Project	Newcastle Education Campus Project
SoHI	Statement of Heritage Impact
UFP	Unexpected Finds Procedure

## 2 PURPOSE AND OBJECTIVES

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### 2.1 PURPOSE

The purpose of this Plan is to describe how impacts on built heritage and historical archaeological material will be minimalised and managed during construction works associated with the Project.

The Plan includes but is not necessarily be limited to:

- Details of management measures and strategies for protection, excavation, salvage and archival recording, and/or conservation of non-Aboriginal heritage items and sites that will be directly or indirectly impacted during construction;
- A methodology for further archaeological investigations, salvage measures and/or measures to protect unaffected sites during construction works in the vicinity and to guide their future interpretation; and,
- Procedures for dealing with previously unidentified non-Aboriginal finds, comprising cessation of works in the vicinity, assessment of the significance of the item(s) and determination of appropriate mitigation measures; and,

### 2.2 OBJECTIVES

The key objective of the CHMSP is to ensure that impacts to non-Aboriginal heritage are minimised and within the scope permitted by the planning approval. To achieve this objective, the following will be undertaken:

- Ensure appropriate measures are implemented to address the relevant conditions of the IoA and environmental management measures outlined in Table 3.1 and any relevant mitigation strategies detailed in the EIS;
- Ensure appropriate controls and procedures are implemented during construction activities to avoid or minimise potential adverse impacts to historic heritage within the Project footprint and beyond;
- Avoid damage or destruction following the unexpected discovery of any items of historic heritage significance during construction and post-construction phases of the work;
- Ensure items of non-Aboriginal heritage value are managed during construction and post construction phases of the work in accordance with best heritage practice;
- Provide staff with an increased level of understanding and awareness of heritage management issues.
- Ensure effective communication is maintained with statutory authorities and all statutory requirements are met to control impacts on items of historical heritage value; and,
- Ensure appropriate measures are implemented to comply with all relevant legislation and other requirements as described in Section 3.1 of this Plan.



## 2.3 TARGETS

The following targets have been established for the management of maritime, Aboriginal cultural heritage and historic heritage impacts during the project:

- Ensure full compliance with the relevant legislative requirements;
- Ensure full compliance with the conditions of the IoA and EIS;
- Minimise or avoid impacts to known historic heritage sites or values, and their heritage significance;
- Follow correct procedure and notification protocols for the management of any unexpected historic heritage objects/places uncovered during construction; and,
- Ensure heritage awareness training is provided to all personnel in the form of inductions before they begin work on-site.

## 3 ENVIRONMENTAL HERITAGE REQUIREMENTS

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### 3.1 RELEVANT LEGISLATION AND GUIDELINES

#### 3.1.1 LEGISLATION

Legislation relevant to historical heritage management includes:

- *Environmental Planning and Assessment Act 1979 (EPA Act)*
- *NSW Heritage Act 1977 (Heritage Act)*

Relevant provisions of the above legislation are explained in the register of legal and other requirements included in Section 4.7.3 of the CEMP.

#### 3.1.2 GUIDELINES

The main guidelines, specifications and policy documents relevant to this Plan include:

- *Archaeological Assessment Guidelines* (Heritage Office and Department of Urban Affairs & Planning. 1996)
- *Assessing Heritage Significance* (Department of Planning and Environment 2023a)
- *Assessing Significance for Historical Archaeological Sites and 'Relics'* (Heritage Council of New South Wales 2009)
- *Criteria for Assessing Excavation Directors* (Heritage Council of NSW 2019)
- *Guidelines for the Preparation of Archaeological Management Plans* (Heritage Branch 2009)
- *Guidelines for Preparing a Statement of Heritage Impact* (Department of Planning and Environment 2023b)
- *Heritage Curtilages* (Heritage Office and Department of Urban Affairs & Planning 1996)
- *Historical Archaeology Code of Practice* (Heritage Office & Department of Planning 2009)
- *How to Prepare Archival Recording of Heritage Items* (Heritage Office 1998)
- *Interpreting Heritage Places and Items Guidelines* (NSW Heritage Office 2005)
- *NSW Heritage Manual* (Heritage Office and Department of Urban Affairs & Planning 1996)
- *Photographic Recording of Heritage Items Using Film or Digital Capture* (NSW Heritage Office 2006)

### 3.2 MINISTER'S CONDITIONS OF APPROVAL

The conditions of the IoA relevant to this Plan are listed in Table 3.1 below. A cross-reference is also included to indicate where the condition is addressed in this Plan or other Project management documents.

**Table 3.1 Location of information in this plan addressing requirements of the IoA.**

Condition	Condition Requirement	Location
B9	<p><b>Community Communication Strategy</b></p> <p>No later than 48 hours before the commencement of construction, a Community Communication Strategy must be submitted to the Planning for information. The Community Communication Strategy must provide mechanisms to facilitate communication between the Applicant, Council and the community (including adjoining affected landowners and businesses, and others directly impacted by the development), during the design and construction of the development, and for a minimum of 12 months following the completion of construction.</p> <p>The Community Communication Strategy must:</p> <p>...</p> <p>(e) include any specific requirements around traffic, noise and vibration, tree retention, <u>heritage</u>.</p>	Community Communication Strategy
B14	<p><b>Construction Environmental Management Plan</b></p> <p>Prior to the commencement of any construction, the Applicant must submit a CEMP to the Certifier and provide a copy to the Planning Secretary for information. The CEMP must include, but not be limited to, the following:</p> <p>(c) an unexpected finds protocol for Aboriginal and <u>non-Aboriginal heritage</u>...</p>	Section 6.1.5
	<p>(c) cont'd ...and associated communications procedure.</p>	Community Communication Strategy
	<p>(i) Cultural Heritage Management Sub-Plan.</p>	This document
B20	<p>The CHMSP must address, but not be limited to, the following:</p> <p>(a) suitably qualified and experienced expert(s) are to identify any significant internal and external elements of the buildings that will be demolished for salvage and, if necessary, storage, for reuse as appropriate, including future interpretation opportunities. Removal of any items to be carried out in accordance with specific salvage methodologies provided by the qualified and experienced expert(s);</p>	Section 6.1.4
	<p>(b) photographic archival records and must:</p> <p>(i) be prepared in accordance with the NSW Heritage Branch guidelines titled Photographic Recording of Heritage Items using Film or Digital Capture;</p> <p>(b) (ii) be of the external and internal areas of the buildings on site and all other items of heritage significance on the site identified in the Statement of Heritage Impact prepared by EJE Heritage dated May 2023; and</p> <p>(b) (iii) must be submitted to Council and the Planning Secretary;</p>	Section 6.1.1
	<p>(c) historical archaeological excavations and must be undertaken by a suitably qualified and experienced professional, in accordance with the requirements of the Heritage NSW within the areas of archaeological potential identified within the Archaeological Assessment and Statement of Heritage Impact prepared by [EMM] dated May 2023.</p>	Section 6.1.2 Section 6.1.3



Condition	Condition Requirement	Location
C29	<p><b>Unexpected Finds Protocol – Historic Heritage</b></p> <p>If any unexpected archaeological relics are uncovered during the work, then:</p> <p>(a) all works must cease immediately in that area and notice must be given to Heritage NSW and the Planning Secretary;</p> <p>(b) depending on the possible significance of the relics, an archaeological assessment and management strategy may be required before further works can continue in that area as determined in consultation with Heritage NSW; and</p> <p>(c) works may only recommence with the written approval of the Planning Secretary.</p>	Section 6.1.5
D22	<p>The Applicant must prepare an archaeological report of the salvage excavation undertaken in accordance with condition B19 and B20. An interim report of the salvage excavation must be provided to the Certifier for information within one month of completion of the salvage work and a final report provided within 12 months of completion of the salvage work or within another timeframe agreed with the Planning Secretary. Copies of the report must also be provided to Heritage NSW and Council.</p>	Section 6.1.3
D34	<p><b>Heritage Interpretation Plan</b></p> <p>A Heritage Interpretation Plan to acknowledge the heritage of the site, must be submitted to the Certifier. The plan must:</p> <p>(a) be prepared by a suitably qualified and experienced expert in consultation with Heritage NSW and Council;</p> <p>(b) include provision for naming elements within the development that acknowledges the site's heritage, such as the history of the various heritage buildings or potential archaeology uncovered during the works; and</p> <p>(c) incorporate interpretive information in relation to the use of the site.</p>	Section 6.1.4
E8	<p><b>Heritage Interpretation Plan</b></p> <p>The Applicant must implement the most recent version of the Heritage Interpretation Plan approved under condition B20.</p>	Section 6.1.4

## 4 EXISTING ENVIRONMENT

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The following sections summarise what is known about Aboriginal and non-Aboriginal heritage within and adjacent to the Project area. The key reference document for historical heritage are Section 6.4.1 of the EIS (Gyde 2023, 77–80), the SoHI prepared by EJE Heritage (2023) and the archaeological assessment prepared by EMM (2023b).

### 4.1 NON-ABORIGINAL HERITAGE

#### 4.1.1 HISTORICAL ARCHAEOLOGICAL HERITAGE

The archaeological assessment includes the following site development history:

*In 1863, James Hannell and his investment group leased land for the racecourse from Australian Agricultural Company (AACO)...In doing so they created the Newcastle Racing Club, later Newcastle Jockey Club. The initial lease was originally for 7 years but lasted over 40 years with AACO still owning the land and having rights to bore for coal. Grass was cleared and fences constructed for the first race on 5 Oct 1865 and by 1872 buildings had been added including: a Grandstand (extended 1875), luncheon room and private rooms for ladies. The racecourse straight in front of the Grandstand would become the future Dumaresq Street that once bisected Newcastle High School meaning that the main racecourse public area was located in the northern half of the Newcastle High School study area (EMM Consulting Pty Ltd 2023b, 19–20).*

Structures associated with the racecourse which were identified as having archaeological potential and which may be impacted by the proposed works are:

- The Grand Stand;
- Leger Stand;
- Judge's Box;
- Telegraph Office; and,
- Well (EMM Consulting Pty Ltd 2023b, 19, 37, 45).

It is noted that the archaeological assessment does not specifically address the potential for the actual race course itself to be present within the study area or impacted by the proposed works. However, this is assessed as being high and will be considered in the mitigation measures included in this CHMSP.

Following the closure of the racecourse, the archaeological assessment notes the following history for the site:

*...the future site of Newcastle High School was used as a golf course... grazing area and occasionally a dumping ground known as Shedden Park...The remnants of the old racecourse track were still being noted on mapping from the period. The issues of dumping in the park was apparently a significant issue to locals with numerous letters to the editor being published. In 1913 a notice in the newspaper reported that Shedden Park included all manner of waste, including building debris, the burial of a horse, rabbit carcasses and most disturbingly of all "accumulation of years from the infectious disease ward of the hospital..." (EMM Consulting Pty Ltd 2023b, 20).*

#### 4.1.2 BUILT HERITAGE VALUES

The following site development history for the school buildings is quoted from the EIS:

*Newcastle High School was established in 1906 within the campus of the Newcastle East Public School. The primary school relocated in 1911 and the High School expanded to 286 students by 1912. Government policy of the time was to create segregated schools in locations within sufficient population, and this was seen to be the case in Newcastle. In November 1925, the Government purchased the southern portion (Parkway Avenue to Dumaresq Street) of the current school site. Two years later it obtained the northern portion of the site by compulsory acquisition of a section of National Park. It was intended that separate boys and girls schools would be constructed on the site.*

*The girls school was constructed first and consisted of Buildings A, K and L. The foundation stone was laid by D.H Drummond Minister for Education in December 1928 and the school was officially opened in March 1930...*

*Building A contains the foundation stone and is the main frontage of the school, presenting a grand entrance to Parkway Avenue. The building is two-storey in a symmetrical U shape. Modifications to the building have occurred including demolition of the single storey demonstration room in 1964 to connect Block A to Block B. In 1976, when the Newcastle Girls' High School was refitted to become co-educational, a major internal renovation was undertaken which included new internal walls and replacement of the slate roof with terracotta tiles. The SoHI concludes that Building A is typically in good condition with the only obvious dilapidation being paint.*

*Building L was constructed as an assembly hall with a capacity of 545 students. It included the detailing which was applied to Building A and has stuccoed entrances and window surrounds.*

*Building K was a gymnasium and constructed of brick with slate roof to match the other buildings. The building had large sliding doors on its southern façade which allowed the gym floor to open onto a wide verandah. It contained the school's first canteen, P.E instructor's office, locker rooms, shower and lavatories. Its external finish was simpler in detail than Building A and L.*

*Building H is a portable building having been introduced circa 1954 and already relocated within the site at least once.*

*Plans for Building C located on the allotment north of Dumaresq Street were prepared and in a departure from the previous intent, was not for a Boys High School but for the Newcastle Central Domestic Science School. The building was designed in a simpler but still impressive style.*

*A portion of the site is located within the Hamilton South 'Garden Suburb' Heritage Conservation Area (HCA). The HCA is significant to the local community for the surviving evidence of an early 20<sup>th</sup> Century subdivision pattern made up of single dwellings on large 'suburban' style allotments generally over 600 [metres<sup>2</sup>]. The area has associational significance with the eminent Australian architect Sir John Sulman.*



The SOHI identifies a number of trees as possible heritage trees and other trees have been categorised as being of high retention value if maintained in their existing groups. The ‘possible heritage trees’ are mature age ‘Hills Weeping Figs’, ‘Norfolk Island Pines’, and ‘Small-Leaf Figs’. The high retention value trees are typically ‘Brush Box’, ‘London Plane Trees’, ‘Angophoras’ and ‘Sydney Blue Gums’ (Gyde 2023, 77–78).

#### 4.1.3 HERITAGE LISTINGS

The site is an item of local environmental heritage and listed under Schedule 5 of the *Newcastle Local Environmental Plan 2012* (Newcastle LEP) as “Newcastle High School” (Item I174) and the southern portion of the site is also located within the “Hamilton South Garden Suburb” HCA (Item C3).

The site curtilage (SHI #5065645) and various buildings (SHI #5065628) are also listed on the register of heritage items maintained by the Department of Education in accordance with Section 170 (DoE S170 Register) of the Heritage Act.

An overview of these listings along with those of additional heritage items in the vicinity of the Project area are listed on the Local Environmental Plan in Table 4.1 below.

**Table 4.1 Heritage items within and in proximity to the Project area**

Item Name	Item Number	Register	Significance	Distance from Project Area
Newcastle High School	I174	Newcastle LEP	Local	n/a
	SHI #5065645	DoE S170 Register	Local	n/a
Newcastle High School – Buildings B00A-B00W, B00G-B00I, B00L and B00p	SHI #5065628	DoE S170 Register	Local	n/a
Parkway Avenue, including verges, median strips, public footpaths, public roads, kerbs and gutters, street trees, garden beds, bridges and stormwater drains	I704	Newcastle LEP	Local	10m at closest point
House	I175	Newcastle LEP	Local	240m
Fig Trees	I161	Newcastle LEP	Local	250m
Hamilton South Garden Suburb Heritage Conservation Area	C3	Newcastle LEP	Local	n/a

## 5 ENVIRONMENTAL ASPECTS AND IMPACTS

### 5.1 CONSTRUCTION ACTIVITIES

Key aspects of the project that could result in adverse impacts to historic heritage include:

- Demolition works;
- Relocation and refurbishment of existing buildings;
- Construction of new buildings, covered walkways, drop-off/pick up areas, waste facilities and sporting facilities;
- Tree removal;
- Landscaping; and,
- Ancillary works including public domain infrastructure.

### 5.2 NON-ABORIGINAL HERITAGE IMPACTS

#### 5.2.1 BUILT HERITAGE

The EIS identified that Project works are being undertaken within the Hamilton South Garden Suburb HCA and in the vicinity of 4 listed heritage items. Of these, only the Newcastle High School itself and its associated buildings will be subject to direct impacts. The remaining items are subject to a range of indirect impacts, some of which will be ongoing (e.g. visual impacts) and some of which will be construction-related (e.g. noise and vibration). Table 5.1 summarises identified impacts in relation to non-Aboriginal built heritage sites.

**Table 5.1 Built Heritage – Impacts and management.**

Item Name and Listing	Impacts	Heritage Significance and Implication
Newcastle High School Newcastle LEP (Item I174) S170 Register (#5065645)	Works to include demolition of buildings, relocation and refurbishment of other buildings, construction of new buildings, covered walkways, drop-off/pick up areas, waste facilities and sporting facilities, tree removal, landscaping; and ancillary works including public domain infrastructure.	Local significance. Widespread and irreversible impacts across the entirety of the curtilage including the removal of buildings. The level of impact on heritage values will be major.
Newcastle High School; Building A Newcastle LEP (Item I174) S170 Register (#5065628; B00A)	No direct impact. Construction of covered walkway to link Building A and the new learning hub.	Exceptional local significance. New building has been designed to be complementary to Building A. The level of impact on heritage values will be minor.
Newcastle High School; Building B Newcastle LEP (Item I174) S170 Register (#5065628; B00B)	Demolition of building.	Moderate to high local significance. Widespread and irreversible damage from its demolition. The level of impact on heritage values will be major.

Item Name and Listing	Impacts	Heritage Significance and Implication
Newcastle High School; Building C Newcastle LEP (Item I174) S170 Register (#5065628; B00C)	No direct impact. Construction of covered walkway and landscaped area between Building C and the new learning hub.	Exceptional local significance. New building and landscaped area have been designed to be complementary to Building C. The level of impact on heritage values will be minor.
Newcastle High School; Building D Newcastle LEP (Item I174) S170 Register (#5065628; B00D)	Demolition of building.	Moderate local significance. Widespread and irreversible damage from its demolition. The level of impact on heritage values will be major.
Newcastle High School; Building E Newcastle LEP (Item I174) S170 Register (#5065628; B00E)	Demolition of building.	Moderate local significance. Widespread and irreversible damage from its demolition. The level of impact on heritage values will be major.
Newcastle High School; Building G Newcastle LEP (Item I174) S170 Register (#5065628; B00G)	No direct impact. Indirect impacts in the form of temporary construction-related impacts and minor visual intrusion following construction.	Moderate local significance. No implications to this item. The level of impact on heritage values will be nominal.
Newcastle High School; Building H Newcastle LEP (Item I174) S170 Register (#5065628; B00H)	Building to be moved from outside of the conservation area and into a part of the site within the conservation area.	Moderate local significance. New location will enhance the significance of the building and ensure its ongoing relevance. The level of impact on heritage values will be moderate.
Newcastle High School; Building I Newcastle LEP (Item I174) S170 Register (#5065628; B00I)	Demolition of building.	Moderate local significance. Widespread and irreversible damage from its demolition. The level of impact on heritage values will be major.
Newcastle High School; Building J Newcastle LEP (Item I174) S170 Register (#5065628; B00J)	Demolition of building.	Moderate local significance. Widespread and irreversible damage from its demolition. The level of impact on heritage values will be major.
Newcastle High School; Building K Newcastle LEP (Item I174) S170 Register (#5065628; B00K)	Removal of existing walkway linking Building K and Building J and internal refurbishments.	Minor local significance. Localised and generally reversible changes to the interior of the building. The level of impact on heritage values will be minor.



Item Name and Listing	Impacts	Heritage Significance and Implication
Newcastle High School; Building L Newcastle LEP (Item I174) S170 Register (#5065628; B00L)	No direct impact. Indirect impacts in the form of temporary construction-related impacts and minor visual intrusion following construction.	Moderate local significance. No implications to this item. The level of impact on heritage values will be nominal.
Newcastle High School; Building M Newcastle LEP (Item I174) S170 Register (#5065628; B00M)	No direct impact. Indirect impacts in the form of temporary construction-related impacts and minor visual intrusion following construction.	Minor local significance. No implications to this item. The level of impact on heritage values will be nominal.
Newcastle High School; Building N Newcastle LEP (Item I174) S170 Register (#5065628; B00N)	Demolition of building.	Low local significance. Widespread and irreversible damage from its demolition. The level of impact on heritage values will be major.
Newcastle High School; Building O Newcastle LEP (Item I174) S170 Register (#5065628; B00O)	No direct impact. Indirect impacts in the form of temporary construction-related impacts and minor visual intrusion following construction.	Minor local significance. No implications to this item. The level of impact on heritage values will be nominal.
Newcastle High School; Building P Newcastle LEP (Item I174) S170 Register (#5065628; B00P)	Demolition of building.	Moderate local significance. Widespread and irreversible damage from its demolition. The level of impact on heritage values will be major.
Parkway Avenue, including verges, median strips, public footpaths, public roads, kerbs and gutters, street trees, garden beds, bridges and stormwater drains Newcastle LEP (Item I704)	No direct impact. Indirect impacts in the form of temporary construction-related impacts and minor visual intrusion following construction.	Local significance. No implications to this item. The level of impact on heritage values will be nominal.
House Newcastle LEP (Item I175)	No direct impact. Indirect impacts in the form of temporary construction-related impacts and minor visual intrusion following construction.	Local significance. No implications to this item. The level of impact on heritage values will be nominal.
Fig Tree Newcastle LEP (Item I161)	No direct impact. Indirect impacts in the form of temporary construction-related impacts and minor visual intrusion following construction.	Local significance. No implications to this item. The level of impact on heritage values will be nominal.
Hamilton South Garden Suburb Heritage Conservation Area Newcastle LEP (Item C3)	No direct impact. Indirect impacts in the form of temporary construction-related impacts and minor visual intrusion following construction.	Local significance. No implications to this item. The level of impact on heritage values will be nominal.

## 5.2.2 NON-ABORIGINAL HISTORICAL ARCHAEOLOGY

The EIS identified that Project works are also to be undertaken within areas noted in the Archaeological Assessment as having potential for historical archaeological material to be present. Archaeological testing and potentially salvage is to be undertaken prior to construction, in accordance with the methodology outlined in an Archaeological Research Design (ARD). Archaeological heritage likely to be present in the Project area are outlined below in Table 5.2.

**Table 5.2 Non-Aboriginal archaeological heritage – Impacts and management.**

Item Name and Listing	Impacts	Heritage Significance and Implication
Former Newcastle Racecourse No formalised listing	Construction process may impact on archaeological remains associated with the former racecourse and buildings.	Local significance. Widespread and irreversible impacts to any archaeological remains not already disturbed by later development. The level of impact on heritage values will be major.
Newcastle High School Newcastle LEP (Item I174) S170 Register (#5065645)	Construction process may impact on archaeological remains associated with the former buildings identified on earlier aerial imagery of the Project area.	Local significance. Widespread and irreversible impacts to any archaeological remains not already disturbed by later development. The level of impact on heritage values will be major.

## 6 ENVIRONMENTAL MITIGATION AND MANAGEMENT MEASUREMENTS

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A range of mitigation requirements and control measures are identified in the EIS and the conditions outlined in the IoA.

### 6.1 NON-ABORIGINAL HERITAGE MITIGATION STRATEGIES

#### 6.1.1 ARCHIVAL PHOTOGRAPHIC RECORDING

A suitably qualified heritage specialist will be engaged to prepare an archival photographic recording of heritage sites in accordance with *How to prepare archival records of heritage items* (Heritage Office 1998) and *Photographic Recording of Heritage Items Using Film or Digital Capture* (NSW Heritage Office 2006).

Archival recording will be carried out for heritage items in accordance with the relevant Management Measure outlined in Table 6.1 prior to commencement of work that may impact on the items. This will include photography of the individual characteristics of each element with an emphasis on aspects which provide it with specific significance. All aspects of each specified block will be subject to photographic recording including views to and to and from each element to detail their relationship with the surrounding landscape.

Data collection for the archival recording will include the following tasks:

- A photographic catalogue that consists of an index of photographs as per the requirements of the *Photographic Recording of Heritage Items Using Film or Digital Capture* (NSW Heritage Office 2006). The catalogue will include information relating to the photographer, content, orientation and camera specifications. The catalogue will be cross referenced with a plan that shows the location and sequence in which the photographs were taken.
- A detailed plan will be prepared which consists of basic scale drawings of each heritage item including its floor plan and elevations.

Sites requiring archival photographic recording are:

- Block B
- Block I
- Block P

The final Archival Recording Report (ARR) is to be submitted to Newcastle City Council and the Planning Secretary.

#### 6.1.2 ARCHAEOLOGICAL TEST EXCAVATIONS

Archaeological excavations will be carried out under the supervision of a suitability qualified archaeologist who meets the *Criteria for Assessing Excavation Directors* for test excavation of a site of local significance (Heritage Council of NSW 2019). Prior to commencement, the archaeologist is to prepare an ARD, which will define the methodology for undertaking historical archaeological test excavation of areas of archaeological potential which are to be impacted by the proposed design through the excavation of archaeological test trenches and subsequent archaeological monitoring or open area excavation.



The archaeological excavations are to target the location of areas marked as being of medium or high archaeological potential on Figure 7.1 of the Archaeological Assessment (EMM Consulting Pty Ltd 2023b, 45), and the results of the archaeological testing program are to be documented in an interim Archaeological Excavation Report (AER).

### 6.1.3 ARCHAEOLOGICAL SALVAGE EXCAVATIONS

In the event that archaeological material or relics are identified, the need for undertaking open area or salvage excavations will be dictated by the requirements of the ARD. Further works may include seeking avoidance through the changing of construction plans or recording and removing archaeological remains, dependant on the level of preservation and significance of the material. Archaeological excavations will be carried out under the supervision of a suitability qualified archaeologist who meets the *Criteria for Assessing Excavation Directors* for larger scale / complex excavation of a site of local significance.

The results of any archaeological salvage excavations are to be documented in an AER.

### 6.1.4 HERITAGE INTERPRETATION PLAN

A Non-Aboriginal Heritage Interpretation Plan (HIP) is to be prepared for the Project by the heritage advisor in order to fulfill the requirement of Condition D34 of the IoA. The Non-Aboriginal HIP will include consideration of elements to enable the continued interpretation and understanding of heritage values associated with the Project area in the form of a succinct report that includes:

- An outline of the heritage values of the study area and applicability of interpretive media as part of the development layout;
- Identification of any significant internal or external elements of buildings set for demolition which are suitable for retention and/or re-use as appropriate for interpretative purposes;
- Consideration of suitable names for elements of the new design;
- Identification of optimal locations for interpretive media within the development footprint;
- Draft text and images for incorporation into interpretive media;
- The incorporation of one set of consolidated comments from Heritage NSW and Newcastle City Council concerning the content of the Heritage HIP.

### 6.1.5 UNEXPECTED FINDS PROCEDURE

An Unexpected Heritage Finds Procedure (UFP) will be implemented for the duration of the Project. This procedure has been prepared by a suitably qualified and experienced heritage specialist in accordance with relevant guidelines and standards.

## 6.2 MANAGEMENT MEASURES

Specific measures and requirements to address impacts on heritage values are discussed below and outlined in Table 6.1.

**Table 6.1** Heritage management and mitigation measures.

ID	Measure / Requirement	Stage	Responsible Party	Reference	Relevant Internal Documents	Evidence of Implementation
NAH1	Prepare a Cultural Heritage Management Sub-Plan for the Project.	Pre-construction	Heritage Consultant	IoA Condition B14(i) IoA Condition B20	N/A	CHMSP document) (this document)
NAH2	Identify and record any significant internal or external elements of buildings which are set for demolition and oversee their salvage, storage, and potential use in future interpretative opportunities.	Pre-construction	Heritage Consultant	IoA Condition B20(a)	Section 6.1.4	ARR HIP
NAH3	A suitably qualified and experience heritage consultant is to prepare a Heritage Interpretation Plan (HIP) in consultation with Heritage NSW and Newcastle City Council, and be submitted to the Certifier. The HIP is to include provision for naming elements within the site and incorporate means of providing interpretative information in relation to the use of the site.	Pre-construction Construction Post-construction	Heritage Consultant Certifier	IoA Condition D34 IoA Condition E8	Section 6.1.4	Final HIP
NAH4	Provide any specific inputs required in terms of heritage for the Community Communication Strategy	Pre-construction	Heritage Consultant	IoA Condition B9(e) IoA Condition B14(c)	N/A	Community Communication Strategy
NAH5	Undertake photographic archival recording in accordance with all relevant guidelines of Block B, Block I and Block P, as identified in the SoHI.	Pre-construction	Heritage Consultant	EIS Measure 13 IoA Condition B20(b)(i) and (ii)	CHMSP Section 6.1.1	ARR

ID	Measure / Requirement	Stage	Responsible Party	Reference	Relevant Internal Documents	Evidence Implementation of
NAH6	Submit a copy of the final ARR to Newcastle City Council and the Planning Secretary.	Construction	Heritage Consultant	IoA Condition B20(b)(iii)	CHMSP Section 6.1.1	ARR
NAH7	Undertake archaeological investigations in accordance with the methodology outlined in the ARD in the form of testing, salvage and monitoring, as required.	Pre-construction	Heritage Consultant	EIS Measure 14(a) EIS Measure 16(a) IoA Condition B20(c)	CHMSP Section 6.1.2 CHMSP Section 6.1.3 ARD	AER
NAH8	No non-Aboriginal archaeological excavation works shall only occur after completion of the Aboriginal Cultural Heritage Plan (ACHP).	Pre-construction	Environmental Manager	EIS Measure 14(b)	Aboriginal Cultural Heritage Plan (ACHP)	ACHP
NAH9	An interim report detailing the results of salvage excavations must be provided to the Certifier for information purposes within 1 month of the completion of salvage works.	Pre-construction	Heritage Consultant Certifier	IoA Condition D22	CHMSP Section 6.1.3 ARD	Interim AER
NAH10	The AER is to be finalised within 12 months of the completion of salvage works unless another timeframe is agreed with the Planning Secretary, and a copy of the final report must be provided for information purposes to the Certifier, Heritage NSW, and Newcastle City Council.	Post-construction	Heritage Consultant Certifier	IoA Condition D22	CHMSP Section 6.1.3 ARD	Final AER
NAH11	A UFP is to be implemented for the life of the Project to manage the unanticipated identification of relics.	Pre-construction Construction	Environmental Manager Project Manager	EIS Measure 16(a) IoA Condition B14(c) IoA Condition C29	CHMSP Section 6.1.5 CHMSP Appendix TBC	UFP

ID	Measure / Requirement	Stage	Responsible Party	Reference	Relevant Internal Documents	Evidence Implementation of
NAH12	In the event that unexpected archaeological relics are identified by archaeological investigations, notify Heritage NSW and determine whether the relic can be avoided by a change in construction plans or whether further archaeological excavations are required.	Pre-construction Construction	Heritage Consultant Environmental Manager Project Manager	EIS Measure 15(a)	CHMSP Section 6.1.5 CHMSP Appendix TBC	Letter report
NAH13	In the event that unexpected archaeological relics are identified during works associated with the Project, notice is to be provided to Heritage NSW and the Planning Secretary. Dependant on the nature and significance of the archaeological material, an Archaeological Assessment and Management Strategy (AA&MS) may need to be prepared in consultation with Heritage NSW	Construction	Project Manager Environmental Manager Heritage Consultant	IoA Condition C29(a) & (b)	CHMSP Section 6.1.5 CHMSP Appendix TBC	Letter Report AA&MS
NAH14	Following the identification of an unexpected archaeological relic, work may only recommence following receipt of the written approval of the Planning Secretary.	Construction	Heritage Consultant	IoA Condition C29(c)	CHMSP Section 6.1.5 CHMSP Appendix TBC	Letter Report



## **7 COMPLIANCE MANAGEMENT**

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### **7.1 ROLES AND RESPONSIBILITIES**

The Project organisational structure and overall roles and environmental responsibilities are outlined in Section 5.3 of the CEMP. Specific tasks and responsibilities for the Heritage Consultant to ensure implementation of heritage management strategies are detailed in Section 6 and Table 6.1 of this Plan.

All works undertaken by the Heritage Consultant will be carried out by a suitably qualified experienced heritage specialist.

### **7.2 TRAINING**

All employees, contractors and utility staff working on site are to receive non-Aboriginal Cultural Heritage Awareness Training in the form of an induction before they begin work on site. This training will address obligations under the Project IoA, the Heritage Act, and project specific site identification, heritage conservation and management measures. Targeted training in the form of toolbox talks or specific training will also be provided to personnel with a key role in heritage management. Further details regarding staff induction and training are outlined in Section 5.1 of the CEMP.

### **7.3 MONITORING AND INSPECTION**

The Project Manager of the Construction Contractor will conduct regular inspections of sensitive areas, exclusion zones and activities with the potential to impact non-Aboriginal Heritage for the duration of the Project. Issues will be recorded and raised with either the Heritage Consultant or the relevant authorities.

### **7.4 AUDITS**

Audits (both internal and external) will be undertaken to assess the effectiveness of environmental controls, compliance with this sub plan and other relevant approvals, licenses and guidelines.

Cultural heritage should be included within any environmental audit of impacts undertaken during the construction phase.

Audit requirements are detailed in Section 6.2 of the CEMP.

### **7.5 REPORTING**

Reporting requirements and responsibilities are documented in Section 6 of the CEMP.

## 8 REVIEW AND IMPROVEMENT

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### 8.1 CONTINUOUS IMPROVEMENT

Continuous improvement of this plan will be achieved by the ongoing evaluation of environmental management performance against environmental policies, objectives and targets for the purpose of identifying opportunities for improvement.

The continuous improvement process will:

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

### 8.2 CHMSP UPDATE AND AMENDMENT

This HMP will need to be revised whenever the construction program, scope of work, or work methods change, whenever the work methods and control structures are found to be ineffective, based on the results of subsequent phases of archaeological or built heritage documentary work, or if so directed by the Principal. This will occur as needed and in accordance with the process outlined in Section 6 of the CEMP.

## 9 REFERENCES

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