

Parramatta Regional Branch  
National Trust of Australia (NSW)  
nat.trust.parramatta@hotmail.com

5 October 2011

On behalf of the Parramatta Regional Branch of the National Trust of Australia (New South Wales), I wish to make a submission on the proposed Mixed Use Development located at 330 Church Street, Parramatta.

Our submission addresses the heritage aspects of the proposed development which we consider to be inadequately addressed in the documentation provided with the development application. The starting point for any application must be the Parramatta City Centre Local Environment Plan 2007 (LEP 2007). Clause 35(4) of the LEP 2007 requires a heritage impact statement to assess the extent to which the carrying out of the development would affect the heritage significance of any heritage item in the vicinity of the heritage site.

We presume that the document titled, "Statement of Heritage Impact – Mixed Development – 330 Church Street, Parramatta – May 2011" by NBR Pty Ltd purports to address the requirements of clause 35(4). If this is the case then we are grossly disappointed at the contents of this document. While considerable emphasis is placed on the likely impact of the development on the demolition of the existing building, the former Post War Department Store; and the adjacent Lennox Bridge, also a designated heritage item, little regard is paid to the 38 heritage items that the statement says are located within 200 metres of the site. In our view this is a serious flaw in the statement of heritage impact.

Of greater significance however is the potential impact on the Parramatta Regional Park itself an identified heritage item of State significance. Even though located some distance from the site, the height of the proposed towers will intrude into the skyline when viewed from many locations in the park. The visual impact will be more obvious from Old Government House and Domain, a UNESCO World Heritage Site.

In the report of the UNESCO World Heritage Committee 2010 Evaluations of Cultural Properties 34th Ordinary Session held in Brasilia, Brazil from 25 July – 3 August 2010, (<http://whc.unesco.org/en/decisions/3995> ) concern was expressed about the integrity of several of the 11 sites significantly affected by the impact of tall buildings close to and nearby the respective sites, one of which is Old Government House and Domain.

The report stated that sites:

*"may be threatened by the development of the property's peripheral area and in its buffer zone, notably in terms of the landscape impact of growing urban environments. This refers in particular to . . . Parramatta city for Old Government House (2).*

In addition the report focuses on the integrity of the site saying that:

*"Looking at the landscape perspectives and horizon lines, the urban environment significantly alters the property's integrity at several sites, notably the tall buildings near . . . Old Government House (2)". (p96)*

In recommending the world heritage listing the Heritage Committee recommended that the Australian Government:

*"Pay attention to managing the landscape values of the sites in or close to urban areas by studying the visual impact of their current environment and any projects liable to affect those values".(p106)*

It is our opinion that the Statement of Heritage Impact is inadequate as it does not adequately address the extent to which the development will affect the heritage significance of heritage items in the vicinity of the site including Parramatta Regional Park and particularly Old Government House and Domain. The visual impact will be exacerbated by the breaches in the height requirements in LEP 2007.

Further high rise developments may well put at risk the integrity of the Old Government House and Domain as part of the Australian Convict Site.

Cheryl Bates

Secretary, Parramatta Regional Branch