



AUSTRALIA ICOMOS

Secretariat

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3 October 2011

Ms Kate MacDonald
Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Ms McDonald,

RE: 330 Church Street, Parramatta: Mixed Use Residential, Retail and Commercial Development. MP 10_0171

I refer to the proposed development at the above address and provide this letter as a submission on behalf of Australia ICOMOS.

We note there is a non-compliant proposal for two towers, both over the maximum building height of 80 metres, with one tower exceeding the maximum building height by 37.6 metres.

Parramatta is an area of early settlement in Australia and the development site is surrounded by sites of acknowledged local, state, national and world heritage value.

Of particular concern is the impact this development will have on the setting of Old Government House and Domain, Parramatta Park, which is not only of Local and State heritage significance but is included on the National Heritage List and is one of the eleven sites in the Australian Convict Sites World Heritage property. The development will be visually intrusive above the tree line and has the potential to detrimentally impact the setting of Old Government House and Domain, Parramatta Park, and hence negatively affect the place's heritage values. The heritage significance of this important and valuable part of our cultural heritage is linked to the retention of this significant setting.

Australia ICOMOS provided input into the nomination of the Australian Convict Sites, as a national committee of ICOMOS. Under the UNESCO World Heritage Convention ICOMOS is the Advisory Body responsible for assessing nominations to the World Heritage list of cultural heritage places. The ICOMOS assessment report for the Australian Convict Sites, tabled at the 34th Meeting of the World Heritage Committee in Brasilia in 2010, recommended that the Commonwealth of Australia, as the State party:

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 (World Heritage Committee Meeting Decision 34COM 8B.16)

The impact on heritage values of developments in areas surrounding a World Heritage property is of interest and serious concern to the UNESCO World Heritage Committee. The 2010 Assessment report for the Listing further noted under the heading 'Development pressures':

More broadly, some of the sites within the property 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 (see Integrity). This refers in particular to the City of Sydney for Hyde Park Barracks (3) and Cockatoo Island (10), **to Parramatta city for Old Government House (2)** ...

Central to the control of identified National and World Heritage values under the EPBC Act is the need for Ministerial approval of an activity or 'action that has, will have or is likely to have a significant impact on certain aspects of the environment'—that is, the National or World Heritage values of identified places/ properties—and his/her determination as to whether the action 'should proceed' (Chapter 2, Part 2, Section 11).

Australia ICOMOS makes the following recommendations and comments:

1. Australia ICOMOS recommends that the Director-General instructs the proponent to refer the proposed development for assessment under the *Environment Protection and Biodiversity Conservation Act 1999* (the EPBC Act).
2. Australia ICOMOS expresses concern about the Statement of Heritage Impact and the Visual Impact Assessment Report and recommends that these documents be revised to properly consider the impacts of the proposed development on the heritage values of this World Heritage Site and National Heritage Listed place.
3. Australia ICOMOS would like to opportunity to comment on the revised Statement of Heritage Impact of these National and World Heritage values, and the revised Visual Impact Assessment Report, once they have been prepared.

Thank you for your consideration of the views of Australia ICOMOS in this important issue for World Heritage and Australian National heritage, and for New South Wales.

Yours sincerely



Dr Jane Harrington
President