



STATEMENT OF HERITAGE IMPACT

SUPPLEMENTARY STATEMENT
S75W MODIFICATION MOD_3

MAJOR PROJECT 10_0171
MIXED USED DEVELOPMENT
330 CHURCH STREET
PARRAMATTA NSW 2150

JUNE 2013

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**SUPPLEMENTARY STATEMENT OF HERITAGE IMPACT
SECTION 75W MODIFICATION FOR MIXED USE DEVELOPMENT
AT 330 CHURCH STREET PARRAMATTA**

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2.0 INTRODUCTION

This Statement of Heritage Impact is supplementary to that of this firm's original statement of May 2011 and the supplementary statement of November 2011. It should be read in conjunction with those earlier reports. It reviews impacts of proposed modifications to that approved project. The principal modifications with potential for heritage impact include modifications to the podium and additional floors and consequent height of the towers. Following a preliminary assessment of the modification application, the NSW Department of Planning and Infrastructure requested *inter alia* that:

The Statement of Heritage Impact (SHI) prepared to support the original project application should be updated to address the impact of the additional height on the 38 heritage items within the vicinity of the site.¹ In particular, the SHI should address how the revised podium responds to the character and values of Lennox Bridge.

The supplementary assessment of potential heritage impact has been undertaken by Don Wallace, Senior Heritage Consultant, under the direction of Robert Staas, Director / Heritage Consultant of NBRS+PARTNERS Architects. Details of the original development proposal and this modified proposal have been prepared by Tony Caro Architecture Pty Ltd.

3.0 THE PROPOSAL

On 19 October 2012, the Department of Planning issued its consent (MP10_0171) for "demolition of existing structures on site and construction of a mixed use building (residential/retail/serviced apartments), basement with 597 car parking spaces, public domain works and installation of utility services."

The subject Section 75W Application seeks to increase the height of the towers and change the podium design. Specifically, the following is proposed:

- Podium increased height by 1 storey (+ 3.1 metres);
- East Tower increased height by 5 storeys (+ 24.8 metres);
- West Tower increased height by 16 storeys (+ 59.5 metres);
- Increase in 17,594 sqm gross floor area;
- 158 additional residential apartments;
- 96 additional serviced apartments;
- 1,152 sqm less retail floor space;
- Deleted childcare centre;
- 112 additional car parking spaces; and
- Building signage on the serviced apartment tower.

The proposed development as modified is described on drawings by Tony Caro Architecture Pty Ltd as follows:

¹ DoPI has since confirmed that only those 20 items that were assessed in the November 2011 supplementary statement need be addressed.

DRAWING SCHEDULE

NUMBER	TITLE	SCALE
A_000	COVER SHEET/LOCATION PLAN	NTS
A_001	SITE ANALYSIS + CONTEXT PLAN	1:1000
A_096	GA PLAN - PARKING LEVEL 4	1:200 @ A1
A_097	GA PLAN - PARKING LEVEL 3	1:200 @ A1
A_098	GA PLAN - PARKING LEVEL 2	1:200 @ A1
A_099	GA PLAN - PARKING LEVEL 1	1:200 @ A1
A_100	GA PLAN - LEVEL 00 RETAIL	1:200 @ A1
A_101	GA PLAN - LEVEL 01 PODIUM	1:200 @ A1
A_102	GA PLAN - LEVEL 02 PODIUM	1:200 @ A1
A_103	GA PLAN - LEVEL 03 PODIUM	1:200 @ A1
A_104	GA PLAN - LEVEL 04 PODIUM ROOF	1:200 @ A1
A_105	GA PLAN - TYPICAL TOWER LOWER	1:200 @ A1
A_106	GA PLAN - TYPICAL TOWER MIDDLE	1:200 @ A1
A_107	GA PLAN - TYPICAL TOWER UPPER	1:200 @ A1
A_148	APARTMENT PLAN - LEVEL 4	1:100 @ A1
A_149	APARTMENT PLAN - LEVELS 5-27	1:100 @ A1
A_150	APARTMENT PLAN - LEVELS 28-30	1:100 @ A1
A_151	APARTMENT PLAN - LEVEL 31	1:100 @ A1
A_152	APARTMENT PLAN - LEVELS 32-33	1:100 @ A1
A_153	APARTMENT PLAN - LEVEL 34-53	1:100 @ A1
A_154	APARTMENT PLAN - LEVEL 54	1:100 @ A1
A_155	APARTMENT PLAN - LEVELS 55 (Roof)	1:100 @ A1
A_156	APARTMENT PLANS - PODIUM LEVELS 1-3	1:100 @ A1
A_157	APARTMENT PLANS - PODIUM LEVELS 1-3	1:100 @ A1
A_158	APARTMENT PLAN - LEVELS 24-34	1:100 @ A1 DELETED
A_159	APARTMENT PLAN - LEVEL 35	1:100 @ A1 DELETED
A_160	APARTMENT PLAN - LEVEL 36	1:100 @ A1 DELETED
A_161	APARTMENT PLAN - PODIUM TERRACES	1:100 @ A1 DELETED
A_200	SITE SECTIONS	1:200 @ A1
A_300	SITE ELEVATIONS - COMPILED	1:500 @ A1
A_350	PODIUM - ELEVATIONS NORTH + WEST	1:200 @ A1
A_351	PODIUM - ELEVATIONS SOUTH + EAST	1:200 @ A1
A_352	EAST TOWER - ELEVATIONS NORTH + EAST	1:200 @ A1
A_353	EAST TOWER - ELEVATIONS SOUTH + WEST	1:200 @ A1
A_354	WEST TOWER - ELEVATIONS NORTH + EAST	1:250 @ A1
A_355	WEST TOWER - ELEVATIONS NORTH + EAST	1:250 @ A1
A_400	DETAILED ELEVATIONS - PODIUM	1:200 @ A1
A_401	DETAILED ELEVATIONS - PODIUM	1:200 @ A1
A_402	DETAILED ELEVATIONS - PODIUM	1:200 @ A1 DELETED
A_403	DETAILED ELEVATIONS - PODIUM	1:200 @ A1
A_404	DETAILED ELEVATIONS - PODIUM	1:200 @ A1
A_405	DETAILED ELEVATIONS - EAST TOWER	1:200 @ A1
A_406	DETAILED ELEVATIONS - EAST TOWER	1:200 @ A1
A_407	DETAILED ELEVATIONS - EAST TOWER	1:200 @ A1
A_408	DETAILED ELEVATIONS - WEST TOWER	1:200 @ A1
A_409	DETAILED ELEVATIONS - WEST TOWER	1:200 @ A1
A_410	DETAILED ELEVATIONS - WEST TOWER	1:200 @ A1
A_500	SHADOW DIAGRAMS	1:2000 @ A1
A_501	SHADOW DIAGRAMS	1:2000 @ A1
A_550	DIAGRAM - GFA AREAS	1:2000 @ A1
A_650	ADAPTABLE PLAN SCHEDULES	1:100 @ A1
A_801	COLOUR AND MATERIALS BOARD	N/A @ A1

4.0 ASSESSMENT OF IMPACTS ON HERITAGE ITEMS IN THE VICINITY

The May 2011 Statement of Heritage Impact noted a number of heritage items in the vicinity of the development site and assessed the heritage impacts on those items with the greatest potential to be impacted upon. The November 2011 supplementary statement gave further assessment of the potential heritage impacts upon 20 heritage items. These include places in Church Street, Phillip Street and outlying places to the north, east and west.

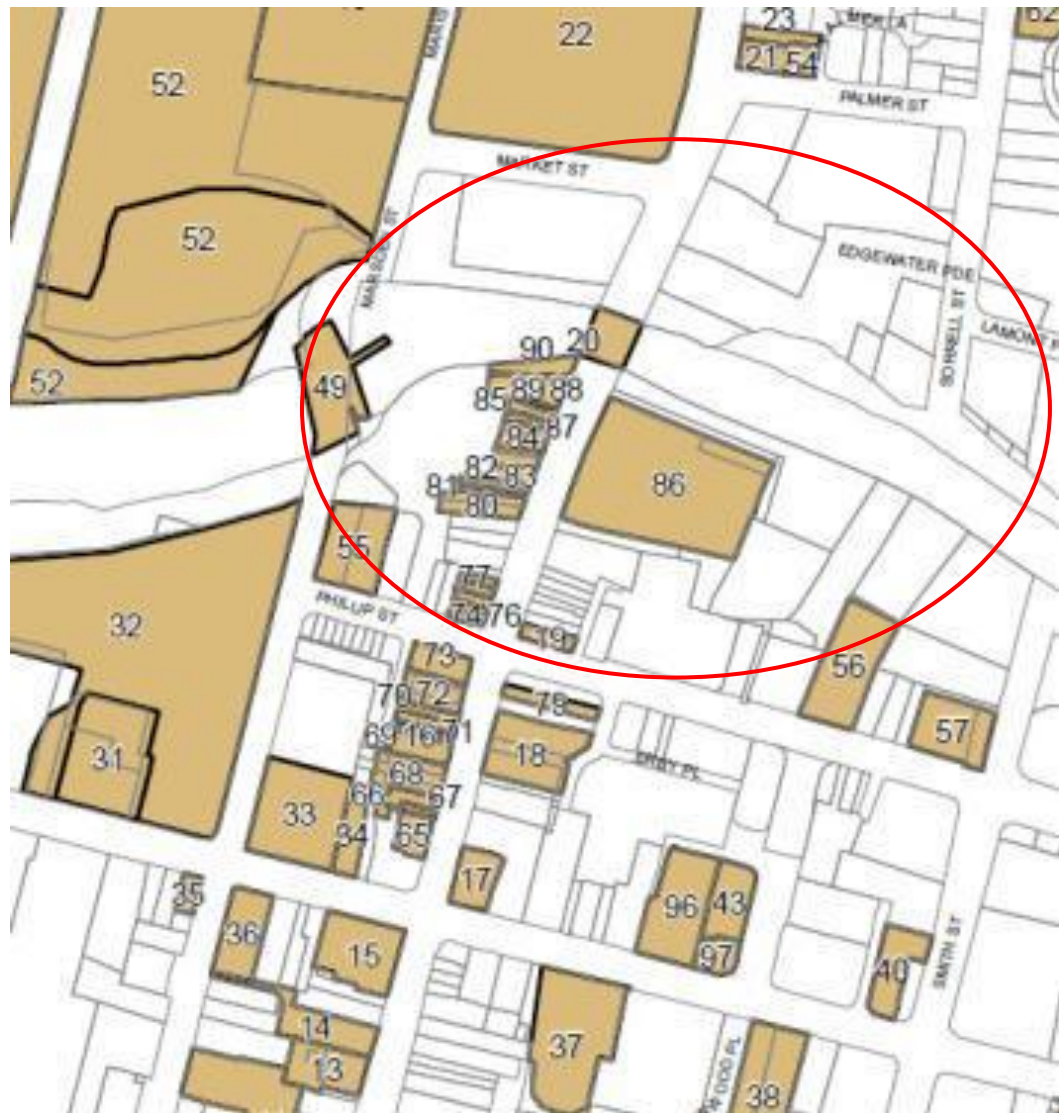


Figure 1 Extract of Parramatta City Centre LEP 2007 Heritage Map showing heritage items in the vicinity of the development site (Item 86).

The built heritage places in Church Street are principally of significance for the largely intact late nineteenth century and early twentieth century two storey streetscape they form. This streetscape between Phillip Street and the Parramatta River predominates on the western side of the street with the altered streetscape of the former David Jones Department Store on the eastern side of the street. The proposed development would replace the

former store with a podium of approximately the same scale and, therefore, would not have a significantly different impact from the current condition. This scale will be further ameliorated by the introduction of a stone clad colonnade at ground level and strong façade articulation in the upper podium along Church Street which breaks down the length of the site and provides a more interesting visually effect within its streetscape context.

The places in Phillip Street comprise the former St Andrew's Uniting Church and Hall to the west and Willow Grove and St George's Terrace to the east. The former church is sufficiently removed from the development site not to be impacted upon. Willow Grove and St George's Terrace are also removed from the subject site by distance and existing intervening development, principally the GE building, and so the proposed development will not have a significant and adverse impact on their setting.

As stated in the May 2011 Statement of Heritage Impact and reiterated in the November 2011 supplementary statement, the setting of the Lennox Bridge will be enhanced as the development will reveal more of the original abutments of the bridge which are currently obscured on the river bank. The stone clad colonnade is compatible with the character of the bridge and creates a strong civic character to the riverbank. With the activation of the river bank esplanade, greater access for the public to appreciate the bridge and its river setting will be possible.

The outlying places to the north are principally visible from north of the development and although parts of the development would be visible from these places (Alfred Square and St Peter's Church), the development does not interrupt principal views. Views to these places are already defined at their edges by higher density development on the north side of the Parramatta River.

4.1 Shop - 281 Church Street (Item 74)

No database entry could be found on the State Heritage Inventory on this place. The street address of Item 74 appears to be 285 Church Street (Lot 3 DP 610555). 281 is part of a group of commercial buildings on the southwest corner of Phillip and Church Streets. The built heritage significance of 285 Church Street is as a component and contributing element in the largely intact late nineteenth century and early twentieth century two storey streetscape on the western side of Church Street.



Figure 2 285 Church Street. NBRS+Partners, 2011.

4.2 Shop - 287 Church Street (Item 75)

No database entry could be found on the State Heritage Inventory on this place.

The built heritage significance of 287 Church Street is as a component and contributing element in the largely intact late nineteenth century and early twentieth century two storey streetscape on the western side of Church Street.



Figure 3 287 Church Street (Chocolateria San Churro). NBRS+Partners, 2011.

4.3 Shops (Melville's Buildings) - 289 – 293 Church Street (Items 76, 77 and 78)

No database entry could be found on the State Heritage Inventory on this place.

The built heritage significance of 289 - 293 Church Street (Melville's Buildings) is as a component and contributing element in the largely intact late nineteenth century and early twentieth century two storey streetscape on the western side of Church Street.



*Figure 4 289-293 Church Street also known as Melville's Buildings.
NBRS+Partners, 2011.*

4.4 Shop and Potential Archaeological Site - 300 Church Street (Item 79)

This site is south of Phillip Street. The State Heritage Inventory states the significance of the place as:

This item is of state significance because it contains visible extant fabric from the mid 19th century and probably retains the original northern three storeyed sandstone wall and its historic shape identified in the c1870's photograph. The 1850's facade has been altered/compromised but its extent cannot be determined without further fabric investigation. This sandstone wall fabric has the potential of being the earliest significant above ground remnant along Church Street and the site could contain archaeology from the earliest phase of Parramatta's development. It is also associated with the southern neighbouring property as an integral part of an unusually high 19th century development on both properties.²

These predominantly archaeological heritage values will not be compromised by development on the subject site.

² State Heritage Inventory Database No 2241015

4.5 Former ANZ Bank and Potential Archaeological Site - 306 Church Street (Item 19)

This former bank building is significant for its architectural quality and the landmark value which strongly arises from its prominent dome. The State Heritage Inventory gives the following

This building makes a notable contribution in Church Street. The site possesses potential to contribute to an understanding early urban development in Parramatta. It is a notable example of the commercial significance of Parramatta in the late nineteenth century.³

As stated in the May 2011 assessment, the public appreciation of the landmark building from ground level will not be impacted upon significantly and adversely by the proposed development.



*Figure 5 306 Church Street viewed from east along Phillip Street.
NBRS+Partners, 2011.*

³ State Heritage Inventory Database No 2241017



*Figure 6 306 Church Street viewed from south along Church Street.
NBRSPartners, 2008.*

4.6 311-315 Church Street (Item 80)

No database entry could be found on the State Heritage Inventory on this place.

The built heritage significance of 311-315 Church Street is as a component and contributing element in the streetscape on the western side of Church Street in terms of its two storey scale and demonstration of development into the mid-twentieth century.



Figure 7 311-315 Church Street. NBRSPartners, 2011.

4.7 317 Church Street (Item 81)

No database entry could be found on the State Heritage Inventory on this place.

The built heritage significance of 317 Church Street is as a component and contributing element in the largely intact late nineteenth century and early twentieth century two storey streetscape on the western side of Church Street.



Figure 8 317 Church Street. NBRS+Partners, 2011.

4.8 321 Church Street (Item 82)

No database entry could be found on the State Heritage Inventory on this place.

The built heritage significance of 321 Church Street is as a component and contributing element in the largely intact late nineteenth century and early twentieth century two storey streetscape on the western side of Church Street.



Figure 9 321 Church Street. NBRS+Partners, 2011.

4.9 323 Church Street (Item 83)

No database entry could be found on the State Heritage Inventory on this place.

The built heritage significance of 323 Church Street is as a component and contributing element in the largely intact late nineteenth century and early twentieth century two storey streetscape on the western side of Church Street.



Figure 10 323 Church Street. NBRS+Partners, 2011.

4.10 325 - 327 Church Street (Item 84)

No database entry could be found on the State Heritage Inventory on this place.

The built heritage significance of 325 - 327 Church Street is as a component and contributing element in the largely intact late nineteenth century and early twentieth century two storey streetscape on the western side of Church Street.



Figure 11 325-327 Church Street. NBRSPartners, 2011.

4.11 329-331 Church Street (Item 85)

No database entry could be found on the State Heritage Inventory on this place.

It is understood this place has been listed for its archaeological potential which would be unaffected by development on adjacent sites.



Figure 12 329-331 Church Street. NBRS+Partners, 2011.

4.12 333 Church Street (Item 89)

No database entry could be found on the State Heritage Inventory on this place.

The built heritage significance of 333 Church Street is as a component and contributing element in the streetscape on the western side of Church Street in terms of its two storey scale and demonstration of development into the mid-twentieth century in its featurist, modern style.



Figure 13 333 Church Street. NBRS+Partners, 2011.

4.13 339 Church Street (Item 90)

No database entry could be found on the State Heritage Inventory on this place.

The built heritage significance of 339 Church Street is as a component and contributing element in the largely intact late nineteenth century and early twentieth century two storey streetscape on the western side of Church Street.



Figure 14 339 Church Street. NBRS+Partners, 2011.

4.14 Lennox Bridge - Church Street (Item 20)

The Department of Planning and Infrastructure has specifically requested that this revised assessment of heritage impacts address 'how the revised podium responds to the character and values of Lennox Bridge'.

Lennox Bridge is listed on the State Heritage Register. It is also listed on Schedule 5 of the *Parramatta City Centre Local Environmental Plan 2007* and the Section 170 Heritage and Conservation Register of Roads and Maritime Services.

Its summary statement of significance from its State Heritage Register entry is drawn from the 14 May 2009 assessment on the RMS Section 170 Register and is as follows:

The Lennox Bridge is of State significance, as one of the oldest extant bridges in Australia, and survives as a rare example of early nineteenth century civil engineering technology. It is probable that some of the stones from which is built originally formed part of an even earlier structure. The original portion of the bridge is significant as one of the foremost examples of the work of the colony's first Superintendent of Bridges, David Lennox, renowned for his engineering works and innovative bridge designs. Lennox Bridge has been an important feature of the Parramatta townscape for over one hundred and fifty years, and as such is directly associated with the historical development of Parramatta since the 1830s. Alterations and modifications to the bridge structure are the result of the changing needs of the local community over time, and reflect the important role of the bridge in the growth of the town/city. Successive changes made to the bridge fabric over a long period of time mean that the existing bridge structure has considerable archaeological potential. Historically it is a conspicuous element of grace and repose in a picturesque Arcadian landscape. The Lennox Bridge, due to its visual prominence and aesthetic qualities, today enhances the scenic amenity of that section of the Parramatta River which flows through the city centre. Widespread recognition of its historic and social importance has resulted in Lennox Bridge having many times achieved the status of a symbol for the Parramatta locality. The cultural significance of the Lennox Bridge is recognised by numerous individuals and conservation-oriented organisations throughout Australia.

The siting of the bridge, where Church Street crosses the Parramatta River, is historically significant as the site of the earliest documented river crossing in the Parramatta district, dating from the earliest years of colonial settlement. Three bridges have been built on or immediately adjacent to this site which consequently possesses a high degree of archaeological potential.

Since the heritage impacts of the original project were assessed, NSW Roads & Maritime Services prepared *Conservation Management Plan – Lennox Bridge over Parramatta River, Parramatta*. This July 2012 management document assessed the cultural significance of the bridge in greater detail to the Register listing and provided conservation policies to conserve that significance. The significance was stated as:

The place where Church Street crosses the Parramatta River is historically significant as the site of the earliest documented river crossing in the Parramatta district, dating from the earliest years of colonial settlement. Three

bridges have been built on or immediately adjacent to this site which consequently possesses a high degree of archaeological potential. Lennox Bridge is significant as one of the oldest extant bridges in Australia, and survives as a rare example of early nineteenth century civil engineering. The original portion of the bridge is significant as one of the foremost examples of the work of the colony's first Superintendent of Bridges, David Lennox, renowned for his engineering works and innovative bridge designs. Lennox Bridge has been an important feature of the Parramatta townscape for over one hundred and fifty years, and as such is directly associated with the historical development of Parramatta since the 1830s. The alterations and modifications to the Bridge structure are the result of the changing needs of the local community over time, and reflect the important role of the Bridge in the growth of the City of Parramatta.

Successive changes made to the Bridge fabric over a long period of time mean that the existing Bridge structure has considerable archaeological potential. Historically a conspicuous element of grace in a picturesque Arcadian landscape, the Lennox Bridge, due to its visual prominence and aesthetic qualities, today enhances the scenic amenity of that section of the Parramatta River which flows through the city centre. Widespread recognition of its historic and social importance has resulted in Lennox Bridge having many times been used as a symbol for the Parramatta locality. The cultural significance of the Lennox Bridge is recognised by numerous individuals and conservation-oriented organisations throughout Australia. The Bridge is listed on numerous heritage registers including the SHR which is the highest level of heritage protection that can be conferred on a heritage item under NSW legislation. [RMS:98]

In developing the plan's conservation policy, certain issues were identified including the extent of the curtilage as follows:

The existing curtilage does not contain the entire Bridge as those sections of abutment wing wall that have been subject to adjacent development are excluded. This is most apparent on the eastern side of the Bridge where the southern end of the wing wall is buried under the David Jones building, while the northern end adjacent to the Parramatta Heritage Centre building also lies outside the curtilage. It should be extended a further 10 metres to the north and south in order that the full length of the approaches are placed under the control of the RMS. [RMS:110]

That statement was then built into the conservation policy 7.1.5:

A curtilage to define the boundaries of the State Heritage Register listing for Lennox Bridge has been prepared by the Heritage Branch. The curtilage does not cover the land adjacent to the Bridge or the river and riverbed. Any development proposed for the land adjacent to the Bridge but not within the curtilage should be considered carefully to ensure that it does not have an unacceptable visual impact which could cause a reduction in the aesthetic significance of the Bridge. [RMS: 116]

Provision was made for management of the visual impact of development within the setting of the bridge in conservation policies 7.2.3 and 7.2.4:

7.2.3 Maintaining views and vistas

Views of the Bridge from the river, its banks and adjacent bridges are impressive reminders of the sheer feat of constructing a large masonry arch across the river using unskilled convict labour.

Views towards the Bridge from the river and the riverside parkway would depend on the retention of open space next to the structure. Parramatta Council should review their Landscape Plan of Management for the riverside park to maintain views and vistas to the Bridge from the park.

7.2.4 Landscaping

Landscaped areas should be maintained at a high standard of care. Landscaping should not obscure the views identified as being of significance in this report. [RMS:118]

The issue of extent of curtilage is referenced in correspondence from the NSW Heritage Council (see below) and in Archaeological and Heritage Management Solutions' (AHMS) *Aboriginal & Historical Preliminary Archaeological Impact Assessment* of May 2011. The AHMS assessment accompanied the original project application and indicated that:

The Lennox Bridge located adjacent to the study area. It is likely that some bridge abutments and construction material may be located in the study area. [AHMS:38]...While this assessment focuses on archaeological impacts, the proposed development may directly disturb or adversely affect some parts of the Lennox Bridge, outside its SHR and s.170 Conservation Register curtilage. [AHMS:62]

Following the Heritage Branch of the NSW Office of Environment & Heritage's review of the original project application, the then Chair of the NSW Heritage Council submitted a letter indicating concern on the impacts on some heritage elements in the vicinity of the development. That submission of 1 December 2011 was qualified in her subsequent letter of 9 December 2011. The latter correspondence included the following paragraph:

Regarding issues raised of possible breaches of the existing Local Environmental Plan height limits, these remain a matter for Parramatta City Council. I confirm that none of the curtilages for existing Parramatta based State-listed heritage sites are impacted by the proposal. As such, the controls of the NSW Heritage Act 1977 do not apply.

As stated in the May 2011 Statement of Heritage Impact and reiterated in the November 2011 supplementary statement [NBRS, November 2011:12], the setting of the Lennox Bridge will be enhanced as the development will reveal more of the original abutments of the bridge which are currently obscured on the river bank. The potential for discovery on-site of bridge abutments and other construction material with which they are associated has been provided for under conditions C8 and D17 of the Instrument of Approval for the project:

C8 ARCHAEOLOGICAL INVESTIGATIONS

- (1) Prior to the commencement of works the proponent shall undertake a professional archaeological investigation program to allow any significant archaeological heritage resource (terrestrial or maritime) and remnant built fabric elements to be accurately identified and protected during the works from unnecessary damage. The methodology for the archaeological investigation program shall be submitted to the OEH (Heritage Branch) for approval prior to the commencement of investigations. A copy shall be provided to the department.
- (2) The results of the archaeological investigation program shall include, but not necessarily be limited to:
 - (a) consideration of measures to avoid or minimise disturbance to archaeology, where archaeology of historical archaeological significance is found to be present
 - (b) where it cannot be avoided, recommendations for any further investigations for archaeology of historical archaeological significance
 - (c) management and mitigation measures to ensure there are no additional impacts due to pre-construction and construction activities.
- (3) The results of the archaeological investigation program shall be submitted for the approval of the OEH one month prior to the commencement of pre-construction and construction activities affecting significant archaeology.
- (4) Where areas of historical archaeological significance will be affected by the construction works, these areas are to be subject to a professional archaeological excavation programme and/or recording. A Research Design including an Archaeological Excavation Methodology must be prepared in accordance with Heritage Council guidelines. These are to be prepared to the satisfaction of the OEH.

D17 IMPACT OF BELOW GROUND (SUB-SURFACE) WORKS – NON-ABORIGINAL OBJECTS

If any archaeological relics are uncovered during the course of the work, then all works shall cease immediately in that area and the OEH shall be contacted. Depending on the possible significance of the relics, an archaeological assessment and an excavation permit under the *NSW Heritage Act 1977* may be required before further works can continue in that area.

Although reassessment of the archaeological impacts has not formed part of this review of broader heritage impacts, it seems reasonable that the potential for discoveries that have previously been identified remain in the revised podium as proposed and that the conditions in relation to archaeological investigation and impact of sub-surface non-Aboriginal objects continue to provide appropriate management of these issues.

As mentioned above, the setting of the Lennox Bridge will be enhanced as the development will reveal more of the original abutments of the bridge which are currently obscured on the river bank. The stone clad colonnade is compatible with the character of the bridge and creates a strong civic character to the riverbank.



Figure 15 Lennox Bridge over the Parramatta River viewed from the west.
NBRS+Partners, 2011.



Figure 16 Lennox Bridge over the Parramatta River viewed from the east.
NBRS+Partners, 2011.

4.15 St Peter's Uniting Church – 356 Church Street (Item 21)

The principal significance of this place lies in its former use as a church and its landmark value when viewed from north of the Lennox Bridge. Both these aspects would be unchanged in the proposed development. The State Heritage Inventory states the significance of the place as:

Professional, trade and manufacturing practice - example of the work of notable architect. Evidence of social and cultural life. Site possesses potential to contribute to an understanding of early urban development in Parramatta.⁴



Figure 17 View from north of Lennox Bridge to St Peter's Uniting Church.
NBRS+Partners, 2011.

⁴ State Heritage Inventory Database No 2240121



Figure 18 St Peter's Uniting Church. NBRS+Partners, 2011.

4.16 Alfred Square - Church Street (Item 22)

The key significance of this place is as a mature planted park with monuments and other facilities dating from the nineteenth century. The State Heritage Inventory gives the significance of the place as follows:

Amenities & services - evidence of local Parramatta initiatives separate from Sydney. Association with notable people and events - monuments. The site possesses potential to contribute to an understanding of early urban development in Parramatta.⁵

Views between the development site and this place are very limited due to planting and intervening structures. The development will be visible from the park but will not dominate it or overshadow it.



Figure 19 South east corner of Alfred Square looking towards development site. NBRS+Partners, 2011.

⁵ State Heritage Inventory Database No 2240120

4.17 Parramatta Dam, Marsden Street (Item 49)

This dam is a civil work of significance as it has been built on the location of the original dam. This aspect of significance will be unaffected by the development.

Amenities & services - regional or local.⁶



Figure 20 *Parramatta Dam in distance from Lennox Bridge. NBRSPartners, 2011.*

⁶ State Heritage Inventory Database No 2240385

4.18 Former St Andrew's Uniting Church and Hall, 2 Phillip Street (Item 55)

This former church is of significance as a church and for its landmark value. It is, however, well removed from the development site and will not be dominated by it.

Evidence of social and cultural life. Site possesses potential to contribute to an understanding early urban development in Parramatta. National Trust (Parramatta Branch): Evidence of social and cultural life. Site possesses potential to contribute to an understanding of early urban development in Parramatta.⁷



Figure 21 Former St Andrew's Uniting Church and Hall. NBRSPartners, 2011.

⁷ State Heritage Inventory Database No 2240439

4.19 Willow Grove, 34 Phillip Street (Item 56)

This Late Victorian Italianate style villa set in fenced grounds is of significance as an example of the style and as an example of middle class housing in Parramatta in the late nineteenth century. The State Heritage Inventory gives its significance as follows:

Professional, trade and manufacturing practice - example of an intact house. Larger house than those in locality possibly associated with a notable person. Site possesses potential to contribute to an understanding early urban development in Parramatta.⁸

The place is edged and overshadowed along its western boundary by the mid-rise office tower known as the GE building. This edge buffers the place from any development that could be carried out on the subject development site further to the north and west. Therefore, the impacts will be minimal.



Figure 22 Willow Grove viewed from Phillip Street. NBRS+Partners, 2011.

⁸ State Heritage Inventory Database No 2240440



Figure 23 Willow Grove front garden with GE building at left. NBRSPartners, 2011.

4.20 St George's Terrace and Potential Archaeological Site, 44 and 46 Phillip Street (Item 57)

This terrace house group has low intactness and ability to demonstrate a terrace house group. Nevertheless, they are a remnant from the late nineteenth century which have been significantly modified. The GE building and the very fact of the distance between the group and subject development site mean that additional impacts arising from the development in relation to this place would be minimal. The State Heritage Inventory gives the following Statement of Significance for the group:

House group which makes a notable contribution to townscape due to similarities in age, design, use and materials.⁹



Figure 24 View west along Phillip Street with St George's Terrace in foreground. NBRS+Partners, 2011.

⁹ State Heritage Inventory Database No 2241011



Figure 25 Side view of St George's Terrace. NBRSPartners, 2011.



Figure 26 View west along Phillip Street. NBRSPartners, 2011.

5.0 OLD GOVERNMENT HOUSE & THE GOVERNMENT DOMAIN

Some submissions made on the original project application suggested there would be adverse impacts on the World Heritage Listed Old Government House and the Government Domain. Consequently, the project (the proposed 'action') was referred to the Commonwealth Department of Sustainability, Environment, Water, Population and Communities (SEWPAC). On 21 May 2012, the Minister responsible for the administration of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) decided that the 'action' was not a 'controlled action'.

The current modified project proposal was referred to the Commonwealth under the provisions of the EPBC Act. On 24 April 2013, the Department of Sustainability, Environment, Water, Population and Communities (SEWPAC) advised the proponent that:

...the Department has undertaken an initial consideration of the information that you have provided in Meriton's (as yet unprocessed) referral for a Mixed Use Residential Development at 330 Church Street. Since the assessment of Meriton's previous referral for this development, the Australian Government, in partnership with the NSW Department of Planning and Infrastructure and Parramatta City Council, has commissioned a report titled, *'Development in Parramatta City and the Impact on Old Government House and Domain's World and National Heritage Listed Values: Technical Report'*.

This report identifies areas of sensitivity determined through a review of the World and National Heritage values, the analysis and mapping of important views and settings, the proximity to Old Government House and Domain and consideration of the underlying topography. The proposed development site for Meriton's Mixed Use Residential Development at 330 Church Street, is determined to be in a sensitive area. This recognises that development within this area may have some impact, however not a *significant* impact on the World and National Heritage Values of Old Government House and Domain. As such, the department considers that Meriton's proposal does not require a referral under the EPBC Act.

No further referral under the provisions of that Act is necessary for this proposed modification.

6.0 CONCLUSION

The increase in the height of the towers would really only be appreciable from afar and will be minor and peripheral impacts. The most critical instance of this could be considered to be from the World Heritage Listed Old Government House and Government Domain, however, the Commonwealth Department of Sustainability, Environment, Water, Population and Communities has confirmed that, although there is an impact, that impact is not a 'significant impact'. The height will also bring a minor increase in overshadowing from that approved - principally in the southwest in the early morning and southeast in the late afternoon. These are not considered significant impacts and will be a consequence of the development of Parramatta more densely and to a greater height than the current building stock. The open spaces of the riverbank and the nearby Prince Alfred Park will be unaffected from shadows as they are north of the development.

The modification to the podium – though increased in height by just over 3 metres - maintains a scale not inconsistent with the existing situation along the riverbank and Church Street and is a scale mediated by a ground floor 'base' colonnade and an articulated upper section.

The impacts on the Lennox Bridge are minor and acceptable, the works retain and increase the open space on the riverbank and views to and from the bridge. The works reveal additional parts of the bridge abutments and conditions are in place to protect significant relics that are currently buried as well as to interpret the cultural significance of the place.

The development would remove a listed heritage item, the former David Jones Department Store. This was determined by the design competition brief and confirmed as acceptable by the Project Approval. While it is not viable to maintain elements of the building for retention and reuse on the site, recording and heritage interpretation of the significance of the site would be useful in explaining the obscure history and heritage values of the place. Such interpretation could also be integrated with interpretation of the Lennox Bridge if so desired. Therefore, we maintain our earlier recommendations for:

- Archival recording of the former David Jones Department Store prior to construction; and,
- Preparation and implementation of a Heritage Interpretation Plan for the site and provision for future maintenance and renewal of interpretive devices.

We note that these have been provided for in the existing approval through conditions B34 and C10 respectively. NBRSPartners archivally recorded the place in accordance with condition B34 in 2012. If submitted to Council, that record would satisfy that condition.

The investigation, recording, interpretation and management of potential archaeological relics which might include now buried parts of the Lennox Bridge's southern approach, abutments and associated construction elements has been guided by AHMS' preliminary archaeological assessment and has been provided for in conditions C8, C9 and C10 of the Project Approval the

implementation of which would involve expert archaeological advice and supervision.

The potential heritage impacts of the modified proposal are not 'significant' and are acceptable.

A handwritten signature in black ink that reads "Robert Staas". The signature is written in a cursive, flowing style.

Robert Staas
Director / Heritage Consultant
NBRS+PARTNERS ARCHITECTS

June 2013