

21st may 2015

Secretary
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Attention: Ms Fiona Gibson
Metropolitan projects / Key Site Assessments

Dear Madam,

**Re: Mixed Use, Residential, retail and Commercial development
330 Church Street Parramatta
Section 75W Modification of Approval – MP 10-0171 MOD 6
Response to letter from NSW Heritage Council dated 18th May 2015**

In response to a letter from the Acting Manager Conservation of the Heritage Division Office of Environment and Heritage regarding appropriate assessment of proposed additional height in relation to impact on Old Government House and Domain site, we make the following response:

The site falls within the Riverside Edge Precinct identified in the 2012 Planisphere Report, titled *Development in Parramatta City and the Impact on Old Government House and Domain's World and National Heritage Listed Values*.

The letter from the Heritage Council indicates that the main heritage impact of the current proposal is in relation to the additional height of the eastern tower by six storeys which they consider will exacerbate visual impacts on the setting of the heritage item.

The original and subsequent modified Statements of Heritage Impact submitted with the Application indicate that

The Planisphere Report provides two 'desirable' future development guidelines for this location.

B9 which includes creating an overall transition in height between the city central precinct and Parramatta River and to include upper level setbacks of buildings in the blocks immediately adjacent to the river, which step down in height towards the river.

B10 which requires a visual connection between built and landscape elements to be enhanced by addressing the river, by providing a public interface at street level and by adopting high standards of architectural design.

Precinct 3 falls into views from a variety of points within the World Heritage Curtilage as shown on page 95 of the report. The site is at the periphery of the City panoramic view from Old Government House (1). It is well within panoramic views from the Bathhouse (5) and in the Parramatta River Views (8).

The design has been demonstrated to have addressed these guidelines previously and the additional height in this application does not affect those desired future outcomes for the Riverside Edge. Nothing in the vision for this precinct deals with views from the heritage item towards the subject site.

Views to the site have previously been addressed in the Statements of Heritage Impact where the site is identified as being within the 'sensitive' area rather than the 'highly sensitive' zone. The view from Old Government House towards the City of Parramatta as identified in the Planisphere Report is a 'panoramic view where the lower sections of buildings in the city are screened by existing trees with a 'moderate' visual quality. The photographs provided of the views indicate that the subject site is not a highly prominent point within these views.

Following two previous referrals to the Commonwealth under the provisions of the EPBC Act, a formal response indicated that while there would be some impact there would not be a significant impact on the World Heritage Values and that a referral under the Act was not required. This response quoted in full in the Statement of Heritage Impact dated June 2013 appropriately deals with any suggestion that additional height on the site would trigger further assessment under the EPBC Act.

In justification of the statements in the addendum to the Heritage Impact Statement prepared by NBRSPARTNERS we confirm that a thorough assessment of the location and scale of the revised development was undertaken from the principal vantage points identified within the World heritage area, and while the development will be visible the impacts would be minimised by the distance from the viewer and the peripheral location of the elements within the views.

We continue to assert that while there will be some impact, the impact will not be significant and will not be detrimental to the identified heritage values of the World Heritage Area or its visual connection to the city of Parramatta.

Yours faithfully,
NBRSPARTNERS

A handwritten signature in black ink, appearing to read 'Robert Stass', with a stylized, cursive script.

ROBERT STASS
Associate Director / Heritage Consultant