

Thomas Piovesan
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Department of Planning, Industry and Environment
GPO BOX 404, PARRAMATTA NSW 2124

By email: thomas.piovesan@dpie.nsw.gov.au

Dear Mr Piovesan

Response to Submission comments for Parramatta Leagues Club Hotel (SSD-8800)

Thank you for your referral inviting comments from the Heritage Council of NSW on the above State Significant Development (SSD), Response to Submissions. I note that the Peer Review Report of the Statement of the Heritage and Visual Impact Assessment for the above mentioned development was forwarded to the Heritage Council on 21 February 2021.

It is understood that the proposal has been amended since Heritage NSW (then Heritage Division) previously provided comments in a letter dated 22 February 2019. The amended proposal involves the construction of a hotel to the south of the existing Parramatta Leagues Club building comprising of:

- a 15 storey hotel with 190 rooms
- one basement level for services
- ancillary uses including fitness/ recreational uses and a function room
- vehicular access from Eels Place to the west of the building
- public domain works.

The site is not within the curtilage of any State Heritage Register (SHR) items. However, it is in the immediate vicinity of four SHR items:

- Parramatta Park and Old Government House (SHR 00596);
- Roseneath Cottage (SHR 00042);
- Norma Parker Correctional Centre (SHR 00811); and,
- Cumberland District Hospital Group (SHR 00820).

The site also shares boundaries with these two places inscribed on the Nationally Heritage Listed (NHL):

- The 'Parramatta Female Factory and Institutions Precinct' (Place ID 106234); and,
- 'Old Government House and the Government Domain – Parramatta' (Place ID 105957).

In addition, the site is adjacent to the World Heritage listed 'Australian Convict Sites, Old Government House and Domain, Parramatta New South Wales' (Listed 31 July 2010, Site Reference Number: 1306).

It is located within the Highly Sensitive Area identified under the Conservation Agreement for the protection and conservation of the World and National Heritage Values of this World Heritage site. It should also be noted that the 'Parramatta Female Factory and Institutions Precinct' has heritage values which may meet the criteria for World Heritage nomination and that there is strong and ongoing community and professional support for World Heritage nomination of this site.

The following comments are provided to address the applicant's response to the heritage issues:

Visual Impacts: The Heritage Council does not support the height of the proposed high-rise tower.

It is noted that the height of the proposed tower has been reduced by 6m, however, it remains substantially higher than the newly built Western Sydney Stadium.

The Peer Review Report, prepared by RKH (2022), of the Statement of Heritage and Visual Impact (SHVI) prepared by Purcell supports the assessment within the SHVI that the proposed development is contained below the OGHDC Conservation Agreement height control, provided that the tree planting is maintained to address the probable future risk for this view. However, the Peer Review Report does not entirely support the findings of the SHVI in relation to the visual impacts on the Parramatta North Historic Sites. The report notes that the SHVI understates the visual prominence of the proposed development and that it will be prominent on certain views within the complex, part of the NHL listed Parramatta Female Factory and Institutions Precinct.

Therefore, the earlier concerns raised regarding the visual impact of the proposed development on the items of State, National and World heritage significance remains, and the previous recommendation requiring the high-rise tower component of the current proposal to be limited to a maximum height no more than the adjacent new Western Sydney Stadium (understood to be approximately of height 42m RL) is reiterated.

Historical Archaeological Impacts:

The updated documentation includes 'Historical Archaeological Excavation Letter Report' prepared for the site. The letter confirms that the archaeological testing to determine whether the proposed works would impact the archaeological material, has been completed as required by the earlier comments from the Heritage Council.

The Letter concludes that the archaeological testing demonstrated that the study area does not contain any archaeological material and consequently, the archaeological potential of the site has been redefined to be low.

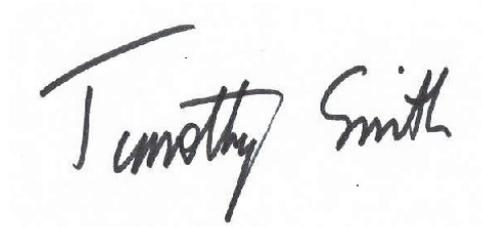
Based on the information provided, it is recommended that the standard condition on the 'Unexpected Finds' mentioned below is recommended should the proposal be approved.

- The Applicant must ensure that if any substantial intact archaeological deposits and/or State significant relics or any other buried fabric such as works not identified in the supporting documents for this approval are discovered, work must cease in the affected area(s) and the Heritage Council of NSW must be notified. To address this discovery, a

s146 notification will need to be lodged to the Heritage Council of NSW. Additional assessment and approval may be required prior to works continuing in the affected area(s) based on the nature of the discovery. Advice would be provided in response to the lodged s146 notification.

If you have any questions regarding the above advice, please contact Vibha Upadhyay, Senior Assessments Officer, at Heritage NSW on 9873 8587 or Vibha.Upadhyay@environment.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink that reads "Timothy Smith". The signature is written in a cursive style with a large, sweeping initial 'T'.

Tim Smith OAM
Director, Assessments,
Heritage NSW
Department of Premier and Cabinet
As Delegate of the Heritage Council of NSW
3 March 2022