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By email: keith.ng@planning.nsw.gov.au

Dear Mr Ng

**Notice of Exhibition of application for Sydney Metro West- Rail infrastructure, stations, precincts and operations (SSI-22765520)**

Thank you for your referral dated 23 March 2022 inviting comments from the Heritage Council of NSW on the above State Significant Infrastructure (SSI) proposal.

The proposed development involves:

- a new 24-kilometre metro line with stations confirmed at Westmead, Parramatta, Sydney Olympic Park, North Strathfield, Burwood North, Five Dock, The Bays, Pyrmont and Hunter Street (Sydney CBD), including:
  - fit-out of tunnels including rail systems for metro train operations
  - construction fit-out and operation of:
    - Metro station buildings and the surrounding metro precincts
    - Services facilities and traction substations
    - A control centre, test track and stabling and maintenance facility at Clyde
  - space for non-station uses at metro stations (eg retail, commercial and/or community facilities)
  - provisions for over and/or adjacent station development within metro precincts
  - rail interchange support works, including work to the existing T1 Western Line at Westmead and T9 Northern Line at North Strathfield
  - transport network modifications, such as new interchange facilities and changes to public transport networks to service metro stations
  - subdivision of sites
  - operation and maintenance of the Sydney Metro West line.

The proposed SSI affects the following State Heritage Register (SHR):

- Roxy Theatre (SHR no. 00711) located at 65-69 George Street, Parramatta.
- Redcoats Mess House (SHR no. 00218) located at Horwood Place, Parramatta.
- White Bay Power Station (SHR no. 1546) located at Victoria Road, Rozelle.
- Tank Stream (SHR no. 00636) located in Central Sydney.
- Skinners Family Hotel (SHR no. 00584) located at 296 George Street, Sydney.
- NSW Club House Building (SHR no. 00145) located at 31 Blich Street, Sydney.
- City Mutual Life (CML) Assurance Building (SHR no. 00585) located at 60-66 Hunter Street, Sydney.
- Perpetual Trustee Company (SHR no. 00678) located at 33-39 Hunter Street, Sydney.
- Public Trust Office (SHR item no. 01019) located at 9-21 O'Connell Street, Sydney.
- Little Hunter and Hamilton Street Precinct (SHR item no. 00599) located at Little Hunter Street (between Hunter Street and Curtin Place) Sydney.
- Former Wales House (SHR item no. 00586) located at 64-66 Pitt Street, Sydney.

The following reports were considered in our assessment:

- *Sydney Metro West Environmental Impact Statement – Rail infrastructure, stations, precincts and operations – Technical Paper 5 – Non-Aboriginal Heritage*, prepared by Artefact, dated March 2022;
- *Sydney Metro West Environmental Impact Statement – Rail infrastructure, stations, precincts and operations – Technical Paper 6 Landscape and Visual Amenity*, prepared by Iris, dated March 2022; and
- *Sydney Metro West Environmental Impact Statement – Rail infrastructure, stations, precincts and operations – Appendix K – Draft Heritage Interpretation Strategy*, prepared by Extent Heritage, dated 3 March 2022.

As delegate of the Heritage Council of NSW, I provide the following comments:

**General:**

- Heritage NSW notes that the supporting documentation assumes archaeological investigations within construction areas under the previous Sydney Metro West planning applications (SSI 10038 and SSI 19238057) would have been completed and relics removed, except from the areas of additional footprint, subject of the current application, some of which are expected to still retain archaeological potential (Artefact 2022, p. 17 and s. 3.7). Areas of additional footprint per this application include:
  - o Westmead Metro Station;
  - o Sydney Olympic Park Metro Station;
  - o North Strathfield Metro Station;
  - o The Bays Metro Station.
- No additional archaeological impacts are expected because of the extended construction footprint at Westmead Metro Station, and the Sydney Olympic Park and North Strathfield Metro Stations;
- Any archaeological remains still present at the Parramatta Metro Station construction site are proposed to be managed under the approved archaeological research design and excavation methodology (GML Heritage, 2021) developed in response to condition of approval D25 of SSI-10038 (EIS-NAH6). This is supported;
- Any archaeological remains present within The Bays Metro Station construction site additional footprint are proposed to be managed either under a new ARD or an addendum to the existing ARD and methodology prepared under condition of approval D25 of SSI-10038 (EIS-NAH8). Such additional or addendum documents will need to be submitted to HNSW for comments prior to being approved; and
- The provisions under the draft Heritage Interpretation Strategy are supported.

**White Bay Power Station (SHR 1546) further curtilage encroachment:**

- Heritage NSW reiterates concerns about curtilage encroachment on the White Bay Power Station (WBPS) expressed during the assessment of Sydney Metro West Stage 1 (SSI 10038) at both EIS stage (our ref. DOC20/332160) and RTS stage (our ref. DOC20/966426). The current curtilage was established to retain the visibility to and prominence of the WBPS as a harbourside landmark. The curtilage contributes to retaining its impressive scale and setting. The Conservation Management Plan (CMP) notes that WBPS should not be substantially obscured by any development on nearby sites.
- The current expanded construction footprint as proposed for the Bays Metro Construction site would require the construction zone to extend further into the WBPS curtilage, which would further adversely impact the setting and context of the WBPS and potentially diminish its overall massing, configuration, and visibility. No mitigation

measures are proposed. Heritage NSW recommends that consideration be given to reducing the construction zone within the WBPS SHR curtilage.

**Maritime archaeological potential at the Bays Metro Station construction site:**

- Heritage NSW comments on the Sydney Metro West Stage 3 draft EIS (HMS 778) identified that the supporting non-Aboriginal heritage assessment had not considered maritime archaeological potential within reclaimed land at the Bays Metro Station. This is part of SEARs conditions 1 (b) and 2;
- Heritage NSW agrees with the applicant's assessment that large parts of the construction site, including parts of the additional footprint areas as discussed in the supporting assessment, constitute land reclaimed in the 1850-70s (Artefact 2022, s. 11.5). Previous investigations of similar sites have shown that such areas have potential to contain archaeological remains of watercraft of potential State heritage significance (eg the Barangaroo boat);
- Such potential (including potential for maritime infrastructure and pre-1840s shipwrecks or parts thereof) has been identified as 'very likely' by recent assessments of adjacent sites (Cosmos Archaeology 2020, p. 87), however has not been discussed in the supporting assessment for this EIS; and
- Any future addendum ARDs and methodologies to be prepared for the management of archaeological relics within the additional footprints at The Bays Metro Station construction site should contain clear site-specific research including provisions and procedures pertaining to the management of maritime archaeological potential within the subject site.

As local items are in the vicinity of the proposed construction sites, Heritage NSW recommends that advice be sought from the relevant local councils.

If you have any questions regarding the above advice, please contact Dr Dragomir Garbov, Senior Assessments Officer, Major Projects at Heritage NSW on 02 9995 6066 or [Dragomir.Garbov@environment.nsw.gov.au](mailto:Dragomir.Garbov@environment.nsw.gov.au).

Yours sincerely

*Anna London*

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**As Delegate of the Heritage Council of NSW**  
4 May 2022