

Mr Keith Ng
Planner
Department of Planning and Environment
PO BOX 404
PARRAMATTA NSW 2124

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

Dear Mr Ng

Notice of Exhibition of application for Parramatta Light Rail Stage 2 (SSI-10035)

Thank you for your referral dated 9 November 2022 inviting comments from the Heritage Council of NSW on the above State Significant Infrastructure (SSI) proposal.

The proposed development involves two main elements:

- Construction of about 10 kilometres of light rail infrastructure between Camellia and the Carter Street precinct adjacent to Sydney Olympic Park
- Operation of about 13 kilometres of light rail alignment between the Parramatta CBD and the Carter Street precinct, including a section of infrastructure constructed by Parramatta Light Rail Stage 1 between Camellia and the Parramatta CBD.

The following reports were considered in this assessment:

- *EIS Chapter 1 – Introduction*, Transport for NSW (November 2022)
- *EIS Chapter 5 – Design Development, Alternatives and Options*, Transport for NSW (November 2022)
- *EIS Chapter 12 – Non-Aboriginal Heritage*, Transport for NSW (November 2022)
- *EIS Chapter 15 – Landscape and Visual Impacts*, Transport for NSW (November 2022)
- *EIS Chapter 23 – Environmental Management and Mitigation*, Transport for NSW (November 2022)
- *EIS Technical Paper 5 – Statement of Heritage Impact*, RPS Group (October 2022)
- *EIS Technical Paper 6 – Historical Archaeological Assessment*, RPS Group (October 2022)
- *EIS Appendix A – SEARS Compliance Table* Transport for NSW (November 2022)
- *EIS Appendix D – Camellia foreshore to Rydalmere Option*, Transport for NSW (November 2022)
- *EIS Appendix J – Outline CEMP*, Transport for NSW (November 2022)
- *EIS Appendix K – Consolidated Mitigation Measures*, Transport for NSW (November 2022)

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

Built Heritage

1. As previously noted, and as reflected in the EIS, most impacts to built heritage elements are experienced by local items. The impacts to State Heritage Register

(SHR) items within or in the vicinity of the project site (St John's Anglican Cathedral (SHR No. 01805), Newington Armament Depot and Nature Reserve (SHR No.01850), Sewage Pumping Station 67 (SHR No. 01643)), have been assessed as *No Impact* or *Minor*. This is considered acceptable.

2. Impact to the *Bulla Cream Dairy (Willowmere)* (I64 – Parramatta Local Environment Plan Heritage Schedule) is assessed as being *Moderate to Major*. It is understood that alignment Option 2 was selected in part to reduce the track's proximity to the main residence structure. It is noted that this option does result in the demolition of:
 - the "Billiard Room" structure
 - numerous mature landscape elements, including part or all of the row of three Canary Island date palms, and the two mature trees on the north-eastern corner of the site.

As previously stated, given the nature of the place's history and significance, the loss of the landscape features is regrettable and the applicant is urged to try and minimise this impact especially if construction related (rather than alignment or operations related). Likewise, the relocation of significant plantings within the site is encouraged (where possible) as recommended in the proposed mitigation measures.

3. As the proposed works impact local heritage items included on the Parramatta Local Environment Plan (and other local items are in the vicinity) advice should be sought from the relevant local council.

Historical Archaeology

4. As previously stated, the staged approach means that the significance of the potential archaeological resource, and therefore the true extent of the impact to that resource, is not yet understood. Until archaeological testing is completed, and the archaeological resources are properly understood, HNSW cannot comprehensively comment on the appropriateness of the proposed mitigation measures. Following the finalisation of the archaeological testing outcomes, we would appreciate another opportunity to comment on the proposed management approach decided upon by the proponent.
5. HNSW reiterates its previous advice that the current approach for the management of State significant archaeology is preservation and conservation *in situ* as the preferred heritage outcome. We strongly encourage the applicant to ensure that appropriate heritage management is undertaken for the project and that all the options are considered for the mitigation of potential impacts to State significant historical archaeology including (but not limited to) avoidance through redesign and conservation *in situ*.
6. Given that the potential for a State significant archaeological resource is considered at least medium at the five identified HAMUs, the applicant is encouraged to start the preparation of a risk matrix now, to assist with planning for the management these potential finds. In particular the applicant should consider how any such finds may affect the project timeline and budget through potential design modifications or salvage requirements. By considering the risks associated with these potential finds now, possible future timeframe and budget pressures can be alleviated by factoring them into project planning and pipeline design.

Maritime Archaeology

7. The potential for maritime archaeological artefacts of state or local significance has been assessed as low. The proposed mitigation measures are acceptable.

As stated above, we will be awaiting receipt of the outcomes of the archaeological testing associated with the five identified HAMUs. At that time, we will be happy to provide more comprehensive comments and recommendations on the proposed management of any significant archaeology discovered during that process.

If you have any questions regarding the above advice, please contact Sophie Butler, Senior Assessments Officer - TfNSW, at Heritage NSW on 9228 6141 or via email at sophie.butler@environment.nsw.gov.au.

Yours sincerely

Rochelle Johnston

Rochelle Johnston
Senior Manager, Major Projects
Heritage NSW
Department of Planning & Environment
As Delegate of the Heritage Council of NSW

28 November 2022