

Mr James Groundwater
Planner
Department of Planning and Environment
PO BOX 404
PARRAMATTA NSW 2124

By email: james.groundwater@planning.nsw.gov.au

Dear Mr Groundwater

Notice of Exhibition of application for Parramatta Metro - Over Station Development (SSD-35538829)

Thank you for your referral dated 11 November 2022 inviting comments from the Heritage Council of NSW on the above State Significant Development (SSD) proposal.

The proposed development seeks concept approval from maximum building envelopes, proposed land uses, maximum gross floor area and car parking. The proposed development comprises four buildings (Buildings A, B, C and D). This consists of three new commercial office buildings (Buildings A, C, D), and one residential accommodation building (Building B) above and adjacent to the Parramatta metro station.

It is understood that this application does not apply to below ground works, including excavation and construction of the basement carparking, which is being delivered under separate SSI approvals (SSI 10038 and SSI 22765520).

The following reports were considered in this assessment:

- *Environmental Impact Statement - Parramatta Over and Adjacent Station Development*, Ethos Urban, 3 November 2022;
- *EIS Appendix A – SEARS Compliance Table*, Sydney Metro, November 2022
- *EIS Appendix BB – Site Survey*, Sydney Metro, November 2022
- *EIS Appendix D – Mitigation Measures*, Sydney Metro, November 2022
- *EIS Appendix E – Built Form and Urban Design*, Sydney Metro, November 2022
- *EIS Appendix F – Building Envelope Drawing*, Sydney Metro, November 2022
- *EIS Appendix GG – Visual Impact Assessment*, Sydney Metro, November 2022
- *EIS Appendix I – Renders and Artist Impression*, Sydney Metro, November 2022
- *EIS Appendix J – Shadow Studies*, Sydney Metro, November 2022
- *EIS Appendix Q – Design Quality Guidelines*, Bates Smart, October 2022
- *EIS Appendix V – Historic Heritage Impact Assessment*, Sydney Metro, October 2022
- *EIS Appendix X – Noise and Vibration Report*, Sydney Metro, September 2022

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

Built Heritage

1. The subject development site contains and is located in the immediate vicinity of heritage places that are of both State and local heritage significance.
2. As this application deals only with building envelopes, it is noted that it does not include details around the interface between the various heritage items (for example local heritage item I703 (Shops and potential archaeological site at 41-59 George Street). Section 3.0 of the *Design Quality Guideline* is noted and strongly supported. These details in the guideline will be critical to the successful and sympathetic integration of the proposed new elements and the existing heritage items. The application of the guidelines will be considered in detail when the future application is submitted.
3. The proposed public open space and “civic spine” is generally acceptable. It is understood that there will be an impact to the context of “Kia Ora” (local item I716, 62-64 Macquarie Street) and therefore an impact to the significance of the item. While this is regrettable, the northern end of the public open space has the potential to positively impact on the Roxy Theatre. The public open space will provide expanded views to the Roxy Theatre and may become a key focal point for that area of George Street. Even though the Roxy Theatre is outside the project site, consideration should be given to expanding the Heritage Design Guidelines component of the *Design Quality Guidelines* to include details and recommendations on the interface with it.
4. The scale of the proposed buildings will adversely impact the various heritage items in the vicinity, though the potential for visual domination, which in turn emphasises the loss of context, discussed above. Additionally, overshadowing is a particular concern for the Lancer Barracks, Kia Ora, Leigh Memorial Uniting Church and the Horse Parapet Façade (198-216 Church Street and 38-46 Macquarie Street). However, it is noted that some allowances have been made with the envelope configuration to minimise those impacts as far as possible.
5. Regarding impacts to significant view corridors, *Historic Heritage Impact Assessment* and the *Visual Impact Assessment*. please consider the impacts to various views to and from the site. While the proposed buildings will contribute further to the already altered views to the CBD from significant places such as Old Government House, the change to those views is assessed as “not adversely impacted”.

Historical Archaeology

6. As noted above, this application is limited to above ground works and all archaeology is being managed in accordance with previous approvals, particularly the Conditions of Approval for SSI 10038 (Sydney Metro West – Concept and Stage 1).
7. It is noted, that Section 3.5 of the Heritage Design Guidelines in the *Design Quality Guidelines* (p.27) discusses the reconstruction of the town drain within a publicly accessible area of Building C. It is understood that Condition D15 of SSI 10038 states that “*All options available to retain the Parramatta Convict Drain in situ must be considered. If retention of any part of the Parramatta Convict Drain located in situ is not feasible, the Proponent must satisfactorily demonstrate to the Planning Secretary why its removal is appropriate.*”. To date, the Heritage Council of NSW has not received any documentation about this aspect of the SSI 10038 proposal. Therefore, until Condition D15 has been met, we are unable to comment on the appropriateness

of those details included in the *Design Quality Guidelines*, and recommend that the document be amended once Condition D15 has been met and the final decisions regarding the drain have been made.

As the proposed works impact on 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.

If you have any questions regarding the above advice, please contact Sophie Butler, Senior Assessments Officer - TfNSW, at Heritage NSW on 02 9228 6141 or sophie.butler@environment.nsw.gov.au.

Yours sincerely

Rochelle Johnston

Rochelle Johnston
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Heritage NSW
Department of Planning & Environment
As Delegate of the Heritage Council of NSW

30 November 2022