

Our ref: HMS ID 11140

Andy Nixey
Team Leader Assessments
Department of Planning, Housing and Infrastructure
andy.nixey@planning.nsw.gov.au

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Advice on Environmental Impact Statement – State Significant Development

Proposal: Mixed-use precinct with in-fill affordable housing - Wharf Road and Waratah Street
Melrose Place South-East

Major Project reference: SSD-71558962

Received: 15 July 2025

Dear Mr Nixey,

Thank you for your referral dated 15 July 2025 inviting the Heritage Council of NSW to provide advice on the above State Significant Development (SSD) proposal.

The following reports were considered in our assessment:

- Relevant parts of *Melrose Park South-East Environmental Impact Statement for State Significant Development Application*, The Planning Studio, 25 June 2025, including the following appendices:
- Appendix 39: *Melrose Park South-East Statement of Heritage Impact for SSDA*, GML Heritage, 16 April 2025 (the SoHI);
- Appendix 47: *Visual Impact Assessment*, Urbaine Design Group, April 11 202 (the VIA);
- Appendix 54: *Melrose Park South-East Historical Archaeological Assessment*, GML Heritage, 7 April 2025 (the HAA);

As delegate of the Heritage Council of NSW, we advise the following:

- The SSD site does not contain any State Heritage Register (SHR) listed items. SHR listed item *Newington Armament Depot and Nature Reserve* (SHR 01850) is located on the southern bank of the Parramatta River opposite the SSD site.
- We recommend that the Department of Planning, Housing and Infrastructure (DPHI) require the applicant to provide additional information to allow us to complete our assessment, as follows:
 1. Additional visual impact assessment for SHR listed item *Newington Armament Depot and Nature Reserve* (SHR 01850).
 2. An assessment of the potential heritage impacts of the SSD on *Newington Armament Depot and Nature Reserve* (SHR 01850).
 3. Additional information to supplement the assessment included in the HAA.
 4. An Archaeological Research Design and Excavation Methodology (ARDEM).
 5. A Maritime Archaeological Assessment (MAA) for the site.

Detailed requirements for the above items are included in Attachment A.

As the site contains a local heritage item, and other local items are in the vicinity, advice should be sought from the relevant local council.

If you have any questions about this correspondence, please contact Anna Simanowsky, Senior Assessments Officer at Heritage NSW on (02) 9873 8500 or heritagemailbox@environment.nsw.gov.au

Yours sincerely,

Alison Lamond

Alison Lamond
 A/Manger
 Major Projects
 Heritage NSW
 Department of Climate Change, Energy, the Environment and Water
As Delegate of the Heritage Council of NSW
 8 August 2025

Attachment A - Mixed-use precinct with in-fill affordable housing - Wharf Road and Waratah Street Melrose Place South-East (SSD-71558962)

1. Please provide additional visual impact assessment for *Newington Armament Depot and Nature Reserve* (SHR 01850).

The SSD site is across the river and opposite SHR listed item *Newington Armament Depot and Nature Reserve* (SHR 01850). The proposed SSD would be within the visual catchment of the SHR item, which has an extended river frontage. The VIA, which assesses the visual impact from one view point only within the SHR curtilage, does not provide sufficient assessment of the visual impact on the setting and views from the SHR item. We request that the VIA include an additional viewpoint from the River Walk within the SHR curtilage in proximity to the SSD site.

2. Please provide an assessment of the potential heritage impacts of the SSD on *Newington Armament Depot and Nature Reserve* (SHR 01850)

The SSD would be located within the view catchment of the SHR item but the SoHI does not include an assessment of potential heritage impacts for the SHR item. Please provide this assessment with reference to the VIA and additional information requested at item 1.

3. Please provide additional information to supplement the assessment included in the HAA.

- a. It is noted that the archaeological assessment for the Parramatta Light Rail Stage 2 (SSI-10085) referenced in Section 3.2 of the HAA identifies high potential for archaeology of local to state significance adjacent to and within the study area along its boundary with Waratah Street. The HAA identifies this area as having low potential for locally significant archaeology only. Please provide further discussion and rationale for the reassessment of archaeological potential and significance in this part of the study area.
- b. Section 3.7.1 provides an assessment of low potential for archaeology associated with a 'hut' recorded on an 1841 plan. Please clarify why the assessment of potential for this feature differs from the assessment of low-moderate potential for archaeology associated with Edward Davies' farm.
- c. It is noted that Stage 1 works are proposed to be undertaken in accordance with a separate Development Approval, currently under assessment by Parramatta City Council (DA/75/2024). These enabling works include demolition of existing buildings on site, earthworks, formation of roadways, and excavation for other infrastructure. Section 4.1 of the HAA states that enabling works are not considered as a part of the assessment. Heritage NSW requests additional information to clarify:
 - i. The anticipated impact of the enabling works to the identified area of archaeological potential on site.
 - ii. Management measures in place in relation to historical archaeology during enabling works. It should be noted that works taking place in accordance with any Development Approval issued by Parramatta City Council would be subject to the provisions of the *Heritage Act 1977*.

4. Please provide an Archaeological Research Design and Excavation Methodology (ARDEM).

The ARDEM should be completed in accordance with the guideline *Archaeological Assessments*

(Heritage Office and DUAP 1996) to inform and guide archaeological investigations. The ARDEM should:

- a. Identify the potential archaeological resource on site, and how it will be impacted by the proposed works.
- b. Identify research questions to guide the archaeological program.
- c. Justify the proposed approach to investigation.
- d. Propose a methodology for archaeological investigations on site.
- e. Outline triggers for the completion of other mitigation measures following initial investigation, such as completion of salvage excavations.
- f. Include clear triggers and hold points for the identification of substantially intact (and, if present, State significant) archaeological deposits/relics. The hold points should require, and allow for, consideration of redesign to avoid impacts, noting that the current approach for the management of any identified State significant archaeology is preservation and conservation in situ as a preferred heritage outcome.
- g. Provide an Unexpected Finds Procedure for the proposed works.
- h. Consider the inclusion of an artefact discard policy and procedure.
- i. Provide a methodology for post-excavation analysis and reporting.

5. Please provide a Maritime Archaeological Assessment.

A Maritime Archaeological Assessment (MAA) is required to assess the potential for maritime/ riverine heritage items / Underwater Cultural Heritage (UCH) in the proposal area and whether maritime sites were located within the western portion of the site, especially given the proximity of other more substantial wharf structures close by.

It is recommended that the MAA be undertaken by a suitably qualified and experienced maritime archaeologist as defined in the Australasian Institute for Maritime Archaeology Code of Ethics s 2 e. (https://www.aima-underwater.org.au/files/AIMA-Code-of-Ethics-Version-0.3_FINAL.pdf).

The MAA should:

- a. Investigate the past use of the area and possible maritime archaeological heritage items which are known to exist within the proposal area, including Underwater Cultural Heritage (UCH) such as: historic shipwrecks, historic aircraft, historic maritime infrastructure and submerged Indigenous Heritage items, and whether these sites are likely to have been buried in landfill reclamation/ progradation.
- b. Review and summarise statutory databases in this regard (including both Commonwealth, State Maritime/ UCH databases; local heritage Databases – LEP's, dependent on jurisdiction) s170 Registers, and AHIMS database.

Note:

- IF potential maritime heritage items are identified within the proposal area, then it is recommended that following study must be undertaken: a Maritime Statement of Heritage

Significance (MSOHI) to assess the nature, extent and significance of any UCH or riverine heritage items /sites/ relics/ artefacts that may exist within the proposal area.

- IF maritime heritage items are identified within the proposal area and will potentially be impacted by the proposal, then it is recommended that the following study must be undertaken: A Maritime Archaeological Research Design and Excavation Methodology (MARDEM).