



Our ref: DOC20/840778

Mr Marcus Jennejohn  
Department of Planning, Industry and Environment  
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PARRAMATTA NSW 2124

By email: [marcus.jennejohn@planning.nsw.gov.au](mailto:marcus.jennejohn@planning.nsw.gov.au)

Dear Mr Jennejohn,

**Response to Submission comments for Parramatta Powerhouse (SSD-10416)**

Thank you for your referral dated 13 October 2020 inviting comments from the Heritage Council of NSW on the above State Significant Development (SSD) Response to Submissions.

The following comments are provided to address the applicant's response to the heritage issues raised at EIS stage as documented in a letter dated 9 July 2020. Separate correspondence will be provided regarding Aboriginal Cultural Heritage Assessment relevant to the *National Parks and Wildlife Act 1974* for this project. Content regarding Aboriginal Cultural Heritage has been reviewed only in terms of interface with the historical archaeological program.

The following documents were considered in our assessment:

- Powerhouse Parramatta Response to Submissions Report – Appendix H – Addendum Historical Archaeological Impact Assessment Report, prepared by Curio Projects dated 15 September 2020.
- Powerhouse Parramatta Response to Submissions Report – Appendix F – Addendum Statement of Heritage Impact prepared by Advisian, dated 7 October 2020
- Powerhouse Parramatta Response to Submissions and Amended Proposal Report, 34-54 & 30B Phillip Street and 338 Church Street, Parramatta, prepared by Ethos Urban dated 8 October 2020.
- Powerhouse Parramatta Response to Submission Report - Appendix G Heritage Interpretation Strategy Powerhouse Museum, Museum of Applied Arts and Sciences, dated September 2020.
- Powerhouse Parramatta Response to Submission Report - Appendix I Addendum Aboriginal Cultural Heritage Assessment Report, prepared by Curio Projects dated 15 September 2020.

The EIS identified there was potential for the project to achieve a connection to the Lennox Bridge via a new pedestrian ramp through a laneway between the site and Church Street. It recommended that detailed design should ensure the connection was designed to avoid impact to the item (Advisian SOHI 2020: 96). The Ethos Urban RTS Amended Proposal Report (2020, p31) has gone on to advise this proposal is not *'critical to or proposed as part of the development and would be subject to separate and future approvals by others.'* It goes on to clarify the project would include a *'river foreshore path [to] complement and retain the bridge's existing relationship to the public domain'*.

It is noted however that the SSD site boundary extends to the southeastern extent of the Lennox Bridge. HNSW therefore recommends to DPIE that a condition would be appropriate to ensure protection and management of this State significant heritage item during the project. If a modification is proposed in future, additional assessment and detailed design should be undertaken to ensure no impact occurs from the project to the significance of Lennox Bridge as a result of a proposed interface or connection.

The potential heritage significance of the Art Deco Substation No 16 (at 42 Philip Street) was questioned at EIS stage. The Addendum HIS prepared by Advisian 2020 has clarified the item is of local significance, although not listed under the Parramatta Local Environmental Plan 2011 (PLEP). HNSW recommends the project considers the item as a locally significant item. Accordingly, the Project should respond to the advice of the City of Parramatta Council (CoP), who are responsible for providing guidance on local heritage items. HNSW understands that management of the locally listed items in the study area should respond to the provisions established by Clause 5.10 of the PLEP.

The project's Heritage Interpretation Strategy (HIS) sets out a high-level approach to the interpretation of the site and its historical development in the context Parramatta. It sets out four stages required to deliver a final interpretation outcome for the project which would integrate interpretation into the design elements of the project. This is consistent with Heritage Council guidelines. The HIS explains there is an intent to maintain and expand on the original Museum of Applied Arts and Sciences at Powerhouse Parramatta. HNSW recommends that the final interpretation outcome should ensure that any archaeological results are addressed in a meaningful way at the site.

### **Historical Archaeology**

HNSW has reviewed the Addendum Historical Archaeological Assessment prepared by Curio Projects, which considered design changes arising from project amendments. Curio found a likelihood that local and state significance archaeology may be impacted by the amended design set out in the RTS. Historic archaeological remains include potential evidence of Colonial occupation which date from 1804 and that would be of State significance.

The Amended ARD reiterates advice from the EIS that the preferred approach and intent of the project is to redesign to avoid impacts to significant archaeological resources. The Delegate of the Heritage Council supports this preliminary approach which involves a phase of testing to clarify location, integrity and significance and inform design. Where required, testing would be followed by 'open area' salvage (e.g. if avoidance is not possible). The Heritage Council agrees that salvage excavation would be the most likely scenario if significant archaeology survives at the site and cannot be avoided by the final design.

Prior advice from the EIS stage that an amended ARD would be required to support an archaeological salvage phase of excavation remains valid. A condition is recommended for this requirement. The Heritage Council also recommends conditions around the need for a final excavation report as the outcome of any archaeological excavations conducted. This is consistent with requirements under s146 of the *Heritage Act 1977*.

The historical archaeological methodology for excavation should also ensure that it adequately addresses the recording and investigation of Aboriginal objects which may be identified in a post-1788 setting. This may include evidence of 'post contact' archaeology. Amendment to the Addendum Historical Archaeological Research Design may be required to be consistent with the Addendum Aboriginal Cultural Heritage Report which included management of historical and Aboriginal archaeologies in a combined approach. It is noted that the existing ARD includes the potential for post contact evidence as a research question but does not clearly set

out a process for its recording under the historical archaeological program. That should be amended in the ARD because Parramatta as an early colonial township retains evidence of coexistence of Aboriginal people and Colonists and this potential may exist at this site. This amendment should occur before any archaeological testing on site.

HNSW notes again the likelihood of evidence of the Parramatta Sand Body (PSB) part of which is listed on the State Heritage Register as the 'Ancient Aboriginal and Early colonial landscape' (SHR 01863) at Robin Thomas Reserve. While separate advice will be provided by HNSW specific to the Aboriginal Cultural Heritage regulation, the PSB is listed to a large degree as a rare geomorphological body, specific to Parramatta. It is likely that excavation for this project would result in physical impacts to this layer which cannot be avoided. If an archaeological conservation outcome is forthcoming from this project during design stages, this may also retain evidence of the PSB in part within the site. That would be an appropriate management strategy for the PSB, if found. Where works would impact the PSB, HNSW supports the proposed investigation of it and comparative analysis with other parts of the Parramatta Sand Body by a geomorphologist. That may enable testing of results from across the PSB including investigations at several SHR sites such as Parramatta Park and Old Government House; Parramatta North (Cumberland District Hospital Group) and at Robin Thomas Reserve by the Parramatta Light Rail.

If the Department of Planning, Industry and Environment determines it is appropriate to approve this SSD, the following conditions of consent are recommended to manage the above aspects of this project:

#### **Historical Archaeological Management**

1. The project must endeavor through detailed design to avoid physical impacts to state significant historical archaeology by the proposal, including the use of existing disturbed areas of the site. To achieve this outcome, the final design shall be informed by a program of archaeological testing. The testing shall aim to understand the nature, extent and significance of the surviving archaeological deposits as set out in the project's historical archaeological assessment and research design and addendum.
2. If testing identifies an archaeological resource of significance (local, State or both) which cannot be avoided through detailed design, the project shall undertake archaeological open area salvage. This must be supported by a revised historical archaeological research design and excavation methodology (HARDEM). The HARDEM shall be prepared ahead of the salvage stage and submitted for comment and adequacy to the Heritage Council of NSW prior to final approval by the Department of Planning, Industry and Environment (DPIE).
3. The Applicant shall nominate a suitably qualified and experienced historical archaeologist to manage the historical archaeological program according to the following conditions. This person must fulfil the Heritage Council's Excavation Director Criteria for the excavation of State (select) significant archaeological sites. The Heritage Council or its Delegate must confirm that the nominated Excavation Director meets the Criteria.
4. A final archaeological excavation report shall be prepared within 12 months of the completion of archaeological excavation. It should include detailed findings of the project, including any significant artefacts recovered, where they are located and information about their ongoing conservation and protection in perpetuity by the land owner. The final report shall respond to the HARDEM and identify the final repository for the archaeological collection from the excavations. Copies of the final excavation

report shall be provided to the Department of Planning, Industry and Environment (DPIE), the Heritage Council of NSW and to Parramatta Council's local studies unit.

**Site preparation works (including demolition of structures, removal of vegetation and services) as part of the CHMP:**

The site contains archaeological potential. Prior to site preparation commencing (including demolition of structures, removal of vegetation, services location and site fencing) the project's Excavation Director must be involved to review and endorse the proposed strategy. This is required so that the works are conducted in a way that avoids impact on the potential archaeological resource ahead of its investigation under conditions of this consent. The final site preparation strategy shall form part of the site's Construction Heritage Management Plan (CHMP).

**Interpretation**

An Interpretation Plan, which further develops the Interpretation according to stages set out in the document titled '*Powerhouse Parramatta Response to Submission Report - Appendix G Heritage Interpretation Strategy Powerhouse Museum, Museum of Applied Arts and Sciences, dated September 2020*' should be prepared for the project. The updated HIP relevant to each stage should be referred to the Heritage Council of NSW (or its Delegate) for review and comment, with the final version of each stage submitted to the DPIE for approval to address relevant project milestones. The Interpretation Plan must ensure that it appropriately responds to the archaeological results specific to this site and ensure relevant connections and context related to existing MAAS collections for broadest storytelling and interpretation.

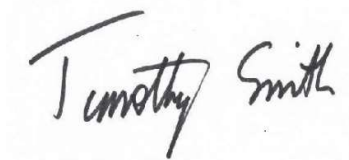
**Lennox Bridge**

We would also suggest that a suitably qualified heritage consultant shall establish protocols for the protection of the Lennox Bridge (SHR 00750) throughout the project to ensure it remains unaffected by the works.

If you have any questions regarding the above advice, please contact Felicity Barry Senior Historical Archaeologist, Specialist Services Team at Heritage NSW, Department of Premier and Cabinet, on 9995 6914 or [Felicity.Barry@environment.nsw.gov.au](mailto:Felicity.Barry@environment.nsw.gov.au).

Thank you for the opportunity to provide comment as Delegate of the Heritage Council of NSW.

Yours sincerely



**Tim Smith, OAM**

Director, Heritage Operations

Heritage NSW

Department of Premier and Cabinet

**As Delegate of the Heritage Council of NSW**

28 October 2020