

10 Valentine Avenue, Parramatta

Statement of Heritage Impact

Report to Future Place Projects

December 2025



 artefact

Artefact Heritage and Environment

ABN 73 144 973 526

Suite 56, Jones Bay Wharf

26-32 Pirrama Road

Pymont NSW 2009

Australia

+61 2 9518 8411

office@artefact.net.au

Document history and status

Revision	Date issued	Reviewed by	Approved by	Date approved	Revision type
1	27/11/2025	Anita Yousif	Scott MacArthur	27/11/2025	Draft
2	17/12/2025	Scott MacArthur	Scott MacArthur	17/12/2025	Final
3					
4					

Project name:	10 Valentine Avenue, Parramatta
Author:	Amelia Parkins
Project manager:	Amelia Parkins
Project number:	240580
Name of organisation:	Artefact Heritage and Environment
Document version:	2

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EXECUTIVE SUMMARY

The proposal seeks to establish a mixed-use development comprising residential accommodation (shop top housing and co-living housing) and retail uses at 10 Valentine Avenue Parramatta. The proposal is categorised as State Significant Development in accordance with Section 27 of the State Environmental Planning Policy (Planning Systems) 2021. As such a State Significant Development Application will be required to be lodged with the Department of Planning Housing and Infrastructure. This Statement of Heritage Impacts supports this a State Significant Development Application based on the following findings.

Overview of findings

The subject site at 10 Valentine Avenue, Parramatta, also known as Lot 2 DP 1119257, is not listed on any heritage registers. For the purpose of this Statement of Heritage Impact the study area includes all items within a 500m radius of the subject site. Within this area there are numerous state and locally listed heritage items.

Based on the drawings for 10 Valentine Avenue, Parramatta, the proposed works would result in the following heritage impacts:

- There will be little to no physical impacts to heritage items in the vicinity as a direct result of the proposed tower development
- The following heritage items in the vicinity have been assessed as having moderate adverse visual impacts resulting from the proposed tower development:
 - Lancer Barracks Precinct
 - 1st/15th Royal NSW Lancers Memorial Museum Collection (impact to the site not the collection)
 - Convict Barracks Wall
 - Commercial Hotel; and
 - Arthur Phillip High School and potential archaeological site
- The remaining identified heritage items in the vicinity will have little to no adverse heritage impact resulting from the proposal, including the Parramatta Railway Station.
- The study area has been assessed as containing low-moderate potential for archaeological remains of no significance associated with the former Austral Flour Mill
 - The proposed development would likely have **major** impacts on archaeological remains of no significance
 - The proposed development would likely have **no** adverse impacts on significant archaeological remains, or 'relics' as defined by the *Heritage Act 1977*
- The overall heritage impact of the proposed development at 10 Valentine Avenue, Parramatta has been assessed as acceptable

The overall heritage impact of the proposed development at 10 Valentine Avenue, Parramatta has been assessed as acceptable.

Approval pathway

The proposal seeks to establish a mixed-use development comprising residential accommodation (shop top housing and co-living housing) and retail uses at 10 Valentine Avenue Parramatta. The proposal is categorised as State Significant Development (SSD) in accordance with Section 27 of the State Environmental Planning Policy (Planning Systems) 2021. As such a State Significant Development Application (SSDA) will be required to be lodged with the Department of Planning Housing and Infrastructure. This SoHI supports this SSDA.

Recommendation

Built heritage

There are no heritage grounds to refuse this application. Consideration should be given to developing heritage sympathetic designs in line with the following recommendations:

- Given the association of the study area with the Austral Flour Milling company and the Arnott's Biscuits company, consideration should be given to installing heritage interpretation materials which relate the historical development of the mill and its relationship with the wider Parramatta and NSW communities.

Archaeology

It is recommended that the following mitigation measures are implemented prior to and during the proposal which requires ground disturbance including excavation works

ID	Mitigation Measure
Heritage Management	
	Unexpected Finds Procedure
	As the study area has been assessed as having low-moderate potential to contain archaeological remains of no significance, it is recommended that potential archaeological resources be managed through an Unexpected Finds Procedure (UFP) that is developed for the proposal. Example UFP content is outlined below for consideration during preparation of the UFP:
<i>Mitigation measure 1</i>	- If archaeological resources are identified during any stage of the project, works in the area must cease, the area adequately protected, and a suitably qualified archaeologist notified so as to carry out more detailed investigation and assessment - If the archaeological assessment determines that the remains are 'relics' in the meaning of the Heritage Act, the Department of Climate Change, Energy, the Environment and Water must be notified about the discovery of relics in accordance with Section 146 of the Heritage Act. Further approval/s may be required to allow the works to proceed.

ID	Mitigation Measure
	Heritage induction
<i>Mitigation Measure 2</i>	• All staff involved in the proposed works, including design professionals and tradespeople, must receive a heritage induction prior to the commencement of works. The heritage induction should cover the historical values of the site and the potential for the project to encounter significant archaeological resources • The induction should make contractors aware of the recommendations and mitigation methods included in this report, including the procedure to follow in the event that an unexpected archaeological find is encountered. Clear lines of communication must be established for the reporting of any such finds and for procedures to be rapidly implemented.
	General
<i>Mitigation Measure 3</i>	• Any additions or design modifications to the proposal, outside the scope of this assessment, would require additional heritage assessment to ensure consistency with this assessment • A copy of this report should be provided to Parramatta City Council and Heritage NSW to inform them of the proposal and the potential impacts to the study area.

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List of abbreviations

Abbreviations used in this report include:

AHC	Australian Heritage Commission
CHS	Comprehensive Heritage Study
CMP	Conservation Management Plan
DCP	Development Control Plan
EP&A	<i>Environmental Planning and Assessment Act 1979</i>
HCA	Heritage Conservation Area
HNSW	Heritage New South Wales
Heritage Act	<i>Heritage Act 1977</i>
ICOMOS	International Committee on Monuments and Sites
LEP	Local Environmental Plan
LGA	Local Government Area
NLA	National Library of Australia
NPWS	National Park and Wildlife Service
PDCP	<i>Parramatta Development Control Plan 2023</i>
PLEP	<i>Parramatta Local Environmental Plan 2023</i>
SHR	State Heritage Register
SHI	State Heritage Inventory
SLNSW	State Library of NSW
SREP	Sydney Regional Environmental Plan

1.0 INTRODUCTION

1.1 Project background

This report has been prepared to support a State Significant Development Application (SSDA) SSD-90243456 and concurrent Rezoning Application (RA) for the site at 10 Valentine Avenue Parramatta.

The Minister for Planning, or their delegate, is the consent authority for the SSDA and this application is lodged with the NSW Department of Planning, Housing and Infrastructure (DPHI) for assessment.

This report has been prepared in response to the requirements contained within the Secretary's Environmental Assessment Requirements (SEARs) dated 12 September 2025 (SSD-90243456).

Artefact Heritage and Environment (Artefact) have been engaged to prepare a Statement of Heritage Impact (SoHI) to support this application.

1.2 Study area

The subject site (Figure 1) is located at 10 Valentine Avenue, also known as Lot 2 DP 1119257. The site is located to the northeast of the corner of Valentine Avenue and Parkes Street within the Parramatta Central Business District (CBD). The site itself is bounded to the north and east by the railway line, Valentine Avenue to the west and Parkes Street to the south.

Currently the site includes a multi storey commercial building to the north and a six-level car park to the south. The area where the car park is currently located is where the proposed new tower will to be constructed.

In order to assess the potential heritage impacts of the proposal, a radius of 500m around the subject site has been used as the study area.

1.3 Methodology

This report has been prepared in consideration of relevant state and federal heritage legislation, including the following:

- *Environmental Protection and Biodiversity Conservation Act 1999*
- *NSW Heritage Act 1977*
- *NSW Environmental Planning and Assessment Act 1979.*

The methodology and terminology used in the preparation of this report has been informed by the relevant heritage guidelines and standards, including:

- *Burra Charter* (Australian ICOMOS)
- *Assessing heritage significance: Guidelines for assessing places and objects against the Heritage Council of NSW criteria* (Department of Planning and Environment, 2023)
- *Guidelines for preparing a statement of heritage impact* (Department of Planning and Environment, 2023)
- *Material Threshold Policy* (Department of Planning and Environment, 2022)
- *Conservation Plan* (J. S Kerr, rev. edn National Trust of Australia [NSW], 1996)

- *A Pictorial Guide to Identifying Australian Architecture* (Apperly, R.; Irving, R. and Reynolds, P, 1989).

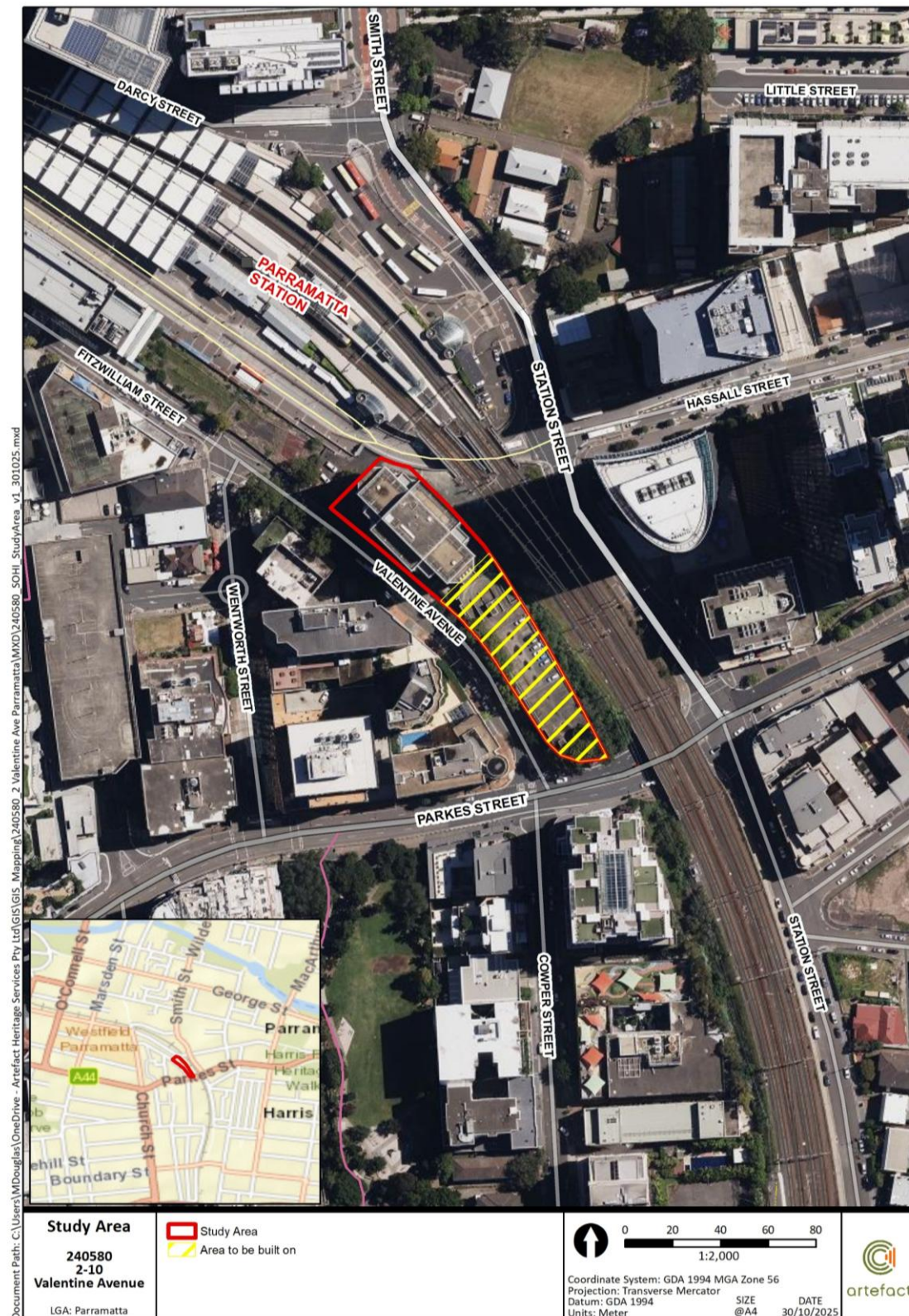


Figure 1: Location of the subject site shown in red with yellow hatching to the land to be built upon (Source: Artefact, 2025).

1.4 Authorship

This report has been prepared by Amelia Parkins (Senior Heritage Consultant) and Daniel Dompierre-Outridge (Heritage Consultant) with input and review provided by Scott MacArthur (Principal), all from Artefact Heritage. Archaeological input and quality assurance has been provided by Anita Yousif.

1.5 Limitations

This report uses historical documentation prepared by third-party heritage professionals. Desktop historical research has been undertaken to supplement this existing information. A site inspection of the study area was undertaken from the public domain only to inform this SoHI.

The maps in this report are for informational purposes only and are not suitable for and were not prepared for legal, engineering, or surveying purposes. Users of this information should review or consult the primary data and information sources to ascertain the usability of the information. The register searches undertaken for this report are current only to the date a particular register was searched. In the normal course of events, items are added to or removed from heritage registers and users of this report should check that sites have not been added to or removed from a particular register since the date the register was searched.

A summary of the statutory requirements regarding heritage is provided in this report. This is made on the basis of Artefact's experience of working with the NSW heritage system and does not purport to be legal advice.

It should be noted that legislation, regulations and guidelines change over time and users of this report should satisfy themselves that the statutory requirements have not changed since the report was written.

1.6 List of project documents

The following architectural drawings by Buchan Furtado Sullivan and Curzon + Partners have been referred to in the preparation of this report:

Drawing number	Drawing title	Revision
VAL-BUC-AZ-DR-A-DA-00001	Cover	C
VAL-BUC-AZ-DR-A-DA-01001	Location Plan	C
VAL-BUC-AZ-DR-A-DA-01002	Survey Plan	C
VAL-BUC-AZ-DR-A-DA-05001	Demolition Plan	C
VAL-BUC-AZ-DR-A-DA-20001	Basement 6 Floor Plan	C

Drawing number	Drawing title	Revision
VAL-BUC-AZ-DR-A-DA-20002	Basement 3-5 Floor Plan	C
VAL-BUC-AZ-DR-A-DA-20003	Basement 2 Floor Plan	C
VAL-BUC-AZ-DR-A-DA-20004	Basement 1 Floor Plan	C
VAL-BUC-AZ-DR-A-DA-20005	Ground Floor Plan	C
VAL-BUC-AZ-DR-A-DA-20006	Level 1 Podium	C
VAL-BUC-AZ-DR-A-DA-20007	Level 2 Podium	C
VAL-BUC-AZ-DR-A-DA-20008	Level 3 Podium	C
VAL-BUC-AZ-DR-A-DA-20009	Level 4 Podium	C
VAL-BUC-AZ-DR-A-DA-20010	Level 5 Podium	C
VAL-BUC-AZ-DR-A-DA-20011	Level 6-8 Floor Plan (typical type A)	C
VAL-BUC-AZ-DR-A-DA-20012	Level 9-18 (typical type B)	C
VAL-BUC-AZ-DR-A-DA-20013	Level 19 Floor Plan	C
VAL-BUC-AZ-DR-A-DA-20014	Level 20-25, 27-48, 50-70 (typical type C)	C
VAL-BUC-AZ-DR-A-DA-20015	Level 26, 49 (residential & plant)	C
VAL-BUC-AZ-DR-A-DA-20016	Level 71 Roof Deck	C
VAL-BUC-AZ-DR-A-DA-20017	Roof Plan	C

Drawing number	Drawing title	Revision
VAL-BUC-AZ-DR-A-DA-40001	South & East Elevations	C
VAL-BUC-AZ-DR-A-DA-40002	North & West Elevations	C
VAL-BUC-AZ-DR-A-DA-41001	External Material Finishes (West)	C
VAL-BUC-AZ-DR-A-DA-41002	External Material Finishes (East)	C
VAL-BUC-AZ-DR-A-DA-50001	Sections	C
VAL-BUC-AZ-DR-A-DA-60001	Façade Details 1	C
VAL-BUC-AZ-DR-A-DA-60002	Façade Details 2	C
VAL-BUC-AZ-DR-A-DA-80001	Storage Compliance 1	C
VAL-BUC-AZ-DR-A-DA-80002	Storage Compliance 2	C
VAL-BUC-AZ-DR-A-DA-81001	Area Schedule	C
VAL-BUC-AZ-DR-A-DA-82011	GFA Diagrams 1	C
VAL-BUC-AZ-DR-A-DA-82012	GFA Diagrams 2	C
VAL-BUC-AZ-DR-A-DA-82013	GFA Diagrams 3	C
VAL-BUC-AZ-DR-A-DA-83001	HV Survey Overlay – Ground Floor Plan	C
VAL-BUC-AZ-DR-A-DA-83002	HV Survey Overlay - Sections	C
VAL-BUC-AZ-DR-A-DA-90001	Tower Renders	C

Drawing number	Drawing title	Revision
VAL-BUC-AZ-DR-A-DA-90002	Tower Render Elevations	C
VAL-BUC-AZ-DR-A-DA-90003	Image Montage	C
DA000	Cover Page	B
DA001	Drawing Register	B
DA002	Site Plan	B
DA003 to DA 006	Existing Site Photographs	B
DA007	Site Analysis	B
DA008	Site Survey	B
DA050	Basement 01 – Existing/ Demolition	B
DA051	Ground Floor Plan – Existing/ Demolition	B
DA052	Level 1 Floor Plan – Existing/ Demolition	B
DA053	Level 2 Floor Plan – Existing/ Demolition	B
DA054	Typical Floor Plan Level 3, 4, 5, 6, 7, 8, 9 – Existing/ Demolition	B
DA056	Typical Floor Plan Level 10, 11, 12 – Existing/ Demolition	B
DA057	Typical Floor Plan Level 13 – Existing/ Demolition	B
DA058	Typical Floor Plan Level 14 – Existing/ Demolition	B

Drawing number	Drawing title	Revision
DA059	Existing Demolition northeast/ northwest elevations	B
DA060	Existing Demolition southeast/ southwest	B
DA100	Basement 01 Floor Plan	B
DA101	Ground Floor Plan	B
DA101-5	Ground Floor Plan	B
DA102	Level 1 Floor Plan	B
DA102-5	Level 1 Floor Plan	B
DA103	Level 2 Floor Plan	B
DA103-5	Level 2 Floor Plan	B
DA104	Typical Floor Plan Level 3	B
DA105	Typical Floor Plan Level 4, 5, 6, 7, 8, 9	B
DA105-5	Typical Floor Plan Level 4, 5, 6, 7, 8, 9	B
DA106	Typical Floor Plan Level 10	B
DA107	Typical Floor Plan Level 11, 12	B
DA108	Typical Floor Plan Level 13	B
DA109	Typical Top Floor Plan Level 14	B

Drawing number	Drawing title	Revision
DA110	Existing Level 14 Mezzanine	B
DA111	Roof Plan	B
DA150	Mixed mode Façade Detail	B
DA151	Typical Façade Detail	B
DA154	Typical Queen Studio 160sqm	B
DA155	Typical Queen Studio 160sqm	B
DA156	Typical King Single Studio 120sqm	B
DA157	Alternate King Studio 120sqm	B
DA158	Communal Kitchen/ Laundry/ Lounge	B
DA202	Proposed northeast/ northwest elevations	B
DA203	Proposed southeast/ southwest elevations	B
DA210	Section AA	B
DA211	Section BB	B
DA212	Section CC – DDA Ramp	B
DA250	Materiality – Sheet 1	B
DA251	Materiality – Sheet 2	B

Drawing number	Drawing title	Revision
DA252	Materiality – Sheet 3	B
DA300	CGI View – Sheet 1	B
DA301	CGI View – Sheet 2	B
DA401	Compliance Diagram - GFA	B
DA402	Compliance Diagram - GFA	B
DA403	Compliance Diagram – Communal Spaces	B
DA404	Compliance Diagram – Solar Access	B
DA405	Sun Eye Diagrams	B
DA406	Shadow Diagrams	B
DA407	Shadow Diagrams	B
DA408	Shadow Diagrams	B
DA409	Shadow Diagrams	B
DA410	Area Schedule	B

2.0 LEGISLATIVE CONTEXT

2.1 Overview

This section discusses the heritage management framework, notably legislative and policy context, applicable to the proposed development and study area.

2.2 Identification of heritage listed items

Heritage listed items were identified through a search of relevant state and federal statutory and non-statutory heritage registers:

- World Heritage List (WHL)
- Commonwealth Heritage List (CHL)
- National Heritage List (NHL)
- State Heritage Register (SHR)
- Section 170 Heritage and Conservation Registers
- NSW State Heritage Inventory database
- Parramatta Local Environmental Plan (LEP) (2023)
- Register of the National Estate (RNE)
- National Trust of Australia (NSW) register.

Items listed on these registers have previously been assessed against the heritage guidelines relevant to their peak governing body. Items that are of Commonwealth, National and World heritage significance have been assessed in accordance with the *Environmental Protection and Biodiversity Conservation Act 1999* (the EPBC Act). Items of state or local significance have been assessed against the NSW Heritage Assessment guidelines. Assessments of heritage significance as they appear in relevant heritage inventory sheets and documents, are provided in this assessment.

There are several items of legislation that are relevant to the current study area. A summary of the relevant Acts and the potential legislative implications are provided below. Section 2.8 below includes a tabulated summary of register searches for heritage curtilages both in the study area, and in its vicinity. For the purposes of this report, 'in the vicinity' indicates a radius of 500 metres around the study area which captures heritage items that may experience visual impacts as a result of the proposed works.

2.3 The World Heritage Convention

The Convention Concerning the Protection of World Cultural and National Heritage (the World Heritage Convention) was adopted by the General Conference of the United Nations Educational, Scientific and Cultural Organisation (UNESCO) on 16 November 1972, and came into force on 17 December 1975. The World Heritage Convention aims to promote international cooperation to protect heritage that is of such outstanding universal value that its conservation is important for current and future generations. It sets out the criteria that a site must meet to be inscribed on the World Heritage List (WHL) and the role of State Parties in the protection and preservation of world and their own national heritage.

There is one item listed on the World Heritage List within the vicinity of the study area:

- Old Government House and Domain as part of the 11 Australian Convict Sites World Heritage serial listing (WHL no 1306).

In 2012, Planisphere prepared a document titled 'Development in Parramatta City and the Impact on Old Government House and Domain's World and National Heritage Listed Values' which has been referenced in the preparation of this SoHI.

It should be noted that the study area falls outside the boundaries of the World Heritage buffer zone (shown in dark green) encompassing the Old Government House and Domain precinct with the subject site identified by a red arrow (Figure 2).

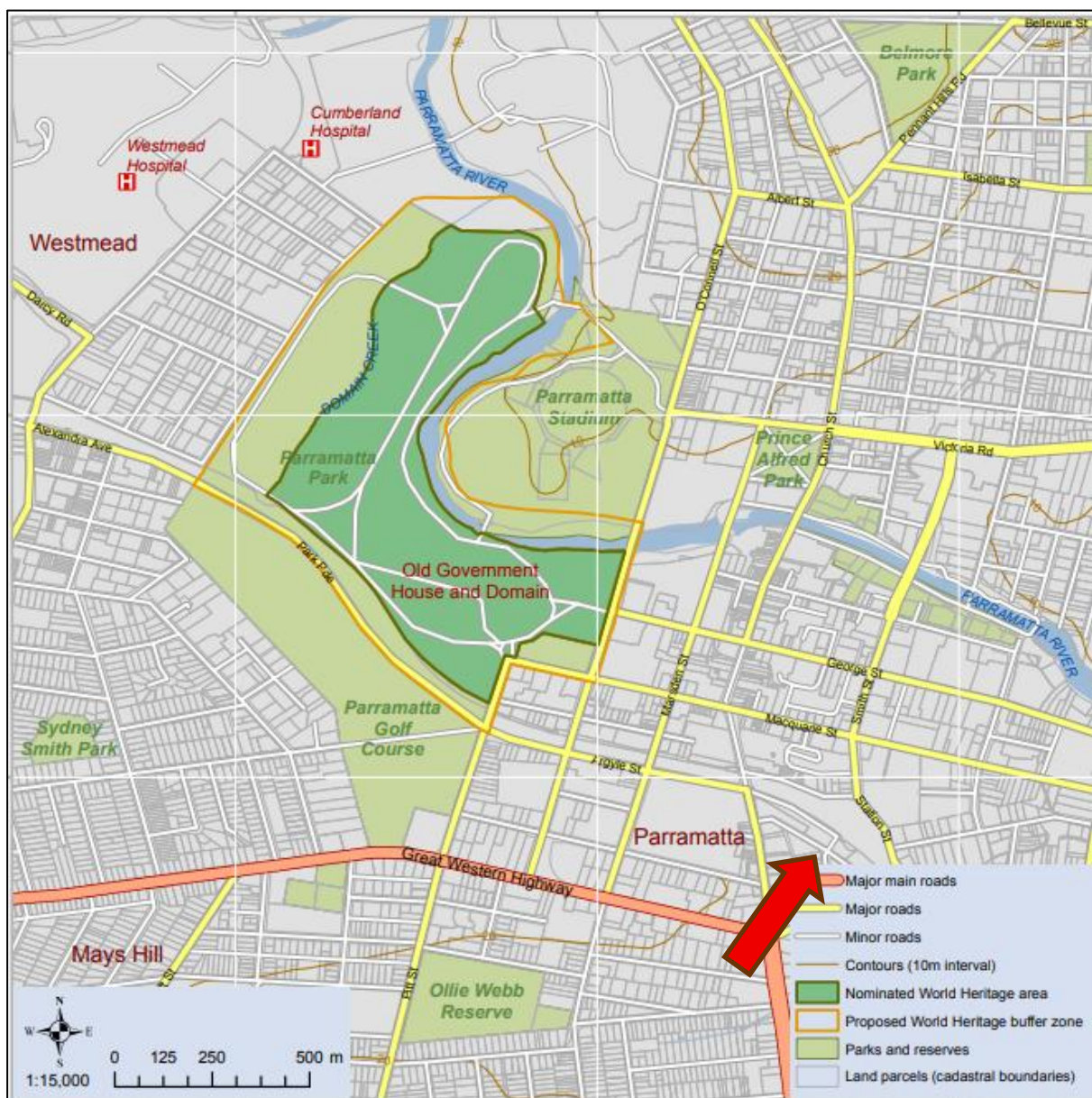


Figure 2. Map of the gazetted curtilage and World Heritage buffer zone of Old Government House and Domain (Source: UNESCO World Heritage Convention, *Australian Convict Sites*)¹

¹ Accessed online via <https://whc.unesco.org/en/list/1306/maps/#map> on 30 October 2025

2.4 Environment Protection and Biodiversity Conservation Act 1999

The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) provides a legislative framework for the protection and management of matters of national environmental significance, that is, flora, fauna, ecological communities and heritage places of national and international importance. Heritage items are protected through their inscription on the World Heritage List, Commonwealth Heritage List, or the National Heritage List. The EPBC Act stipulates that a person who has proposed an action that will, or is likely to, have a significant impact on a World, National or Commonwealth Heritage site must refer the action to the Minister for Sustainability, Environment, Water, Population and Communities (hereafter Minister). The Minister will then determine if the action requires approval under the EPBC Act. If approval is required, an environmental assessment would need to be prepared. The Minister would approve or decline the action based on this assessment.

A significant impact is defined as “an impact which is important, notable, or of consequence, having regard to its context or intensity.” The significance of the action is based on the sensitivity, value and quality of the environment that is to be impacted, and the duration, magnitude and geographic extent of the impact. If the action is to be undertaken in accordance with an accredited management plan, approval is not needed and the matter does not need to be referred to the Minister.

2.4.1 Commonwealth Heritage List

The Commonwealth Heritage List (CHL) has been established to list places of outstanding heritage significance to Australia. Established under the EPBC Act, the CHL comprises natural, Indigenous and historic heritage places on Commonwealth lands and waters or under Australian Government control.

There is one item listed on the Commonwealth Heritage List within the study area:

- Lancer Barracks Precinct (ID 105512)

2.4.2 National Heritage List

The National Heritage List (NHL) has been established to list places of outstanding heritage significance to Australia, including places overseas. There are nine matters of national environmental significance, these include Australia’s world heritage properties (as listed on the World Heritage List [WHL]), national heritage places, wetlands of international importance (listed under the Ramsar Convention), migratory species, listed threatened and ecological communities, Commonwealth marine areas, the Great Barrier Reef Marine Park, nuclear actions including uranium mining, and water resources in relation to coal seam gas developments and large coal mining developments.

There is one item listed on the National Heritage List within the vicinity of the study area:

- Old Government House and the Government Domain (Place ID 105957)

2.5 Heritage Act 1977

The NSW *Heritage Act 1977* (Heritage Act) provides protection for items of ‘environmental heritage’ in NSW. ‘Environmental heritage’ includes places, buildings, works, relics, movable objects or precincts considered significant based on historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic values. Items considered to be significant to the State are listed on the SHR and

cannot be demolished, altered, moved or damaged, or their significance altered without approval from the Heritage Council of NSW.

2.5.1 State Heritage Register

The SHR was established under Section 22 of the Heritage Act and is a list of places and objects of particular importance to the people of NSW, including archaeological sites. The SHR is administered by Heritage NSW and includes a diverse range of over 1,500 items, in both private and public ownership. To be listed, an item must be deemed to be of heritage significance for the whole of NSW. For works to an SHR item, a Section 60 application must be prepared for works that are not exempt under Section 57(2) of the Heritage Act. However, it should be noted that where projects are managed under a State Significant Development (SSD) or State Significant Infrastructure (SSI) approval pathway, the normal requirements for approval under Section 60 of the Heritage Act are not applicable, with the exception of notification requirements.

To carry out activities within the curtilage of an item listed on the SHR, approval must be gained from the Heritage Council by securing a Section 60 permit. In some circumstances, under Section 57(2) of the Heritage Act, a Section 60 permit may not be required if works are undertaken in accordance with the NSW Heritage branch document Standard Exemptions Guidance Document.

There are nine items listed on the State Heritage Register within the vicinity of the study area:

- Parramatta Railway Station (SHR no 00696)
- St John's Anglican Cathedral (SHR no 01805)
- Lennox House (SHR no 00751)
- 1st/15th Royal NSW Lancers Memorial Museum Collection (SHR no 01824)
- Warders Cottages (SHR no 00709)
- Perth House and Stables (SHR no 00155)
- Experiment Farm Cottage (SHR no 00768)
- Roxy Theatre (SHR no 00711)
- Shop and Office (00278)

The following two items are listed on the State Heritage Register but fall just outside the study area. They are being included in the SoHI because the height of the proposed development has the potential to have some visual impact on the heritage items.

- Hambledon Cottage, Grounds and Archaeology (SHR no 01888)
- Elizabeth Farm (SHR no 0001)

2.5.2 'Relics' provision

The Heritage Act also provides protection for 'relics', which includes archaeological material or deposits. Section 4 (1) of the Heritage Act (as amended in 2009) defines a relic as:

"...any deposit, artefact, object or material evidence that:

- (a) relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement, and*

(b) is of State or local heritage significance”

Sections 139 to 146 of the Heritage Act prevent the excavation or disturbance of land known or likely to contain relics, unless under an excavation permit. Section 139 (1) states:

A person must not disturb or excavate any land knowingly or having reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, damaged or destroyed unless the disturbance is carried out in accordance with an excavation permit.

Excavation permits are issued by the Heritage Council of NSW, or its Delegate, under Section 140 of the Heritage Act for relics not listed on the SHR or under Section 60 for impacts within SHR curtilages. An application for an excavation permit must be supported by an Archaeological Research Design (ARD) and Archaeological Assessment prepared in accordance with the NSW Heritage Division archaeological guidelines.

Normally, minor works that would have a minimal impact on archaeological relics may be granted an exception under Section 139 (4) or an exemption under Section 57 (2) of the Heritage Act. However, the proposal is subject to Part 5.2 (State significant infrastructure) provisions of the EP&A Act, and therefore excavation permits, or exemptions would not be required.

In addition to relics, remnants of historical infrastructure that possess little or no research value are considered to be ‘works’.

‘Works’ may be buried, and therefore archaeological in nature, however, exposure of a ‘work’ does not necessarily trigger a requirement to obtain an excavation permit under the Heritage Act. ‘Works’ should be managed according to their significance.

Examples of ‘works’ include:

- Former road surfaces or pavement and kerbing
- Railway infrastructure (former rail track, sleepers or ballast; former rail platforms, footings and former platform copings)
- Former water supply (drains, pipes, wells, cisterns) and other service infrastructure, where there are no historical artefacts in association with the item.
- Footings of former industrial buildings where there are no artefacts associated with the item.

2.5.3 Conservation Management Plans

Under Section 38A of the Heritage Act, if a Conservation Management Plan (CMP) is prepared for an item listed on the SHR, the Heritage Council of NSW may endorse the plan, and use the CMP to make regulations or provisions in relation to the SHR item. A CMP is not required under the Heritage Act, however the Heritage Council of NSW continues to recommend the preparation of CMPs as best practice heritage management documents for places of State Heritage significance and to consider suitable site-specific exemptions.

There is no CMP for the subject site.

The following CMP is for the Parramatta Railway Station, which is listed on the State Heritage Register and is in the vicinity of the subject site:

- *Parramatta Railway Station Site: Conservation Management Plan* (2003), prepared by Godden Mackay Logan for Parramatta Rail Link.

2.5.4 Section 170 registers

Under the Heritage Act all government agencies are required to identify, conserve and manage heritage items in their ownership or control. Section 170 (s170) requires all government agencies to maintain a Heritage and Conservation Register that lists all heritage assets and an assessment of the significance of each asset. They must also ensure that all items inscribed on its list are maintained with due diligence in accordance with State Owned Heritage Management Principles approved by the Government on advice of the NSW Heritage Council. These principles serve to protect and conserve the heritage significance of items and are based on NSW heritage legislation and guidelines.

There are four items listed on the Transport for NSW s170 Heritage and Conservation Register in the vicinity of the subject site:

- Parramatta Park and Old Government House (Railway line only)
- Parramatta Railway Station Group
- Parramatta Station to Parramatta Road Railway Line (Archaeological Site)
- Parramatta Station to Pitt Street Railway Line (Archaeological Site)

2.6 Environmental Planning and Assessment Act 1979 (NSW)

The *Environmental Planning and Assessment Act 1979* (EP&A Act) establishes the framework for cultural heritage values to be formally assessed in the land use planning and development consent process. The EP&A Act requires that environmental impacts are considered prior to land development; this includes impacts on cultural heritage items and places as well as archaeological sites and deposits.

The EP&A Act also requires that local governments prepare planning instruments (such as Local Environmental Plans and Development Control Plans [DCPs]) in accordance with the EP&A Act to provide guidance on the level of environmental assessment required. The study area falls within the boundaries of the Parramatta local government area. Schedule 5 of the *Parramatta Local Environmental Plan 2023* (PLEP 2023) includes a list of items/sites of heritage significance within this LGA.

When a project is approved as an SSD or SSI under s5 of the EP&A Act, the conditions and provisions of other state and local instruments are turned off and approved works are undertaken in accordance with relevant Instruments of Approval.

The project is to be approved as SSD (SSD-70099458) under s5.7 of the EP&A Act.

2.6.1 Parramatta Local Environmental Plan 2023

Heritage items listed on the PLEP 2023 are managed in accordance with the provisions of Section 5.10 Heritage Conservation of this LEP. Under Clause 5 of this section of the PLEP 2023:

The consent authority may, before granting consent to any development:

(a) on land on which a heritage item is located, or

(b) on land that is within a heritage conservation area, or

(c) on land that is within the vicinity of land referred to in paragraph (a) or (b),

require a heritage management document to be prepared that assesses the extent to which the carrying out of the proposed development would affect the heritage significance of the heritage item or heritage conservation area concerned.

The following items within the vicinity of the site are listed on Schedule 5 of the PLEP 2023:

- Single Storey Shop (I283)
- Convict Drain (I453)
- Cottage and potential archaeological site (I454)
- Warders Cottages (I455)
- Lennox house and adjoining brick wall on footpath (I458)
- Masonic Centre (I459)
- Bicentennial Square and adjoining buildings (I461)
- Shop (former Fire Station) (I462)
- Parramatta Town Hall and potential archaeological site (I463)
- Murrays Building and potential archaeological site (I464)
- St Johns Anglican Cathedral (I465)
- St Johns Parish Hall (I466)
- Wardens Cottage, also known as Verger's Cottage (I467)
- Centennial memorial Clock (I468)
- Horse Parapet Façade and potential archaeological site (I470)
- Llonells (I507)
- Jeshyron (I508)
- Parramatta Station (I514)
- Shops and potential archaeological site (I535)
- Roxy Cinema (I538)
- Perth House, Moreton Bay Fig Tree and potential archaeological site (I539)
- Commercial Hotel (I 564)
- Single storey residence (I570)
- Single storey residence (I571)
- Two Storey Residence (I573)
- Cottage (I580)
- Semi-detached Cottage (I581)
- Semi-detached Cottage (I582)
- Kia Ora and potential archaeological site (I584)
- Convict Barracks Wall (I 585)
- Leigh Memorial Uniting Church (I 586)

- Arthur Philip High School and potential archaeological site (I 587)
- House/Industrial (I588)
- Single storey residence (I589)
- Residence – Mona (I590)
- Attached House and Office (I591)
- Single storey residence (I592)
- Attached House and Office (I593)
- Single storey residence (I594)
- Single storey residence (I595)
- Single storey residence (I596)
- Single storey residence (I597)
- Lancer Barracks Group (I 645) Lancer Barracks Group I645
- Attached Houses (I 664)
- Harris Park West Conservation Area (heritage items located within the Conservation area have not been listed individually)
- Experiment Farm Conservation Area (heritage items located within the Conservation area have not been listed individually)

Division 5 Provisions for Parramatta City Centre other than “Area A” of the PLEP 2023 outlines controls that specifically apply to development in the Parramatta City Centre (other than Area A). Under Clause 7.22 ‘Managing heritage impacts’ of this section of the PLEP 2023:

(2) This clause applies to development involving the erection of a building on the following land—

- (a) land on which a heritage item is located,*
- (b) land in a heritage conservation area,*
- (c) land adjacent to land referred to in paragraph (a) or (b).*

(3) Development consent must not be granted to development to which this clause applies unless the consent authority has considered the following—

- (a) the extent to which the carrying out of the development is likely to affect the heritage significance of the relevant heritage item or heritage conservation area,*
- (b) a heritage impact statement,*
- (c) if the development involves a lot amalgamation, which includes a lot that contains, or is adjacent to, a heritage item—a heritage conservation management plan that identifies whether—*
 - (i) further lot amalgamations will be required to support the development of the land, while retaining the heritage significance of the heritage item, and*

(ii) the significance of the heritage item has been prioritised in the amalgamation of the lots,

(d) the location of a tower, if proposed, having regard to the need to achieve an acceptable relationship with the heritage item or heritage conservation area on, or adjacent to, the land in terms of separation, setbacks, amenity and urban form.

2.6.2 Development Control Plan

The *Parramatta Development Control Plan 2023* (PDCP 2023) is a supporting document that compliments the provisions contained within the PLEP 2023 and provides specific design detail in regard to sympathetic development on, or in the vicinity of, items listed on Schedule 5 of the PLEP 2023.

Part 7 Heritage and Archaeology of the PDCP 2023 provides sympathetic considerations for development that is in the vicinity of a heritage listed item. These considerations include ensuring that the character, bulk, scale and height of new development does not unreasonably overshadow a nearby heritage item, that colouring and texture of new materials of a new development is sympathetic to a heritage item, and that views of a heritage item should not be obscured from the point of view of areas of public domain.

2.7 Non-statutory considerations

2.7.1 Register of the National Estate

The Register of the National Estate (RNE) is no longer a statutory list; however, it remains available as an archive. The following RNE items have been identified in/in the vicinity of the study area:

- Auxiliary Buildings former Kings School, Marsden Street, Parramatta (ID 3076)
- Brislington, George Street, Parramatta (ID 3021)
- Centennial Clock, Church Street, Parramatta (ID 3087)
- Central Block Former Kings School, Marsden Street, Parramatta (ID 12391)
- Cottage 12 O'Connell Street (ID 3083)
- Cottage 14 O'Connell Street (ID 3084)
- Hambleson, 47 Hassall Street (ID 3079)
- Headmasters Residence Former Kings School (ID 3075)
- Kia Ora (former) 64 Macquarie Street (ID 3088)
- Kings School (former) Group, Marsden Street (ID 149390)
- Lancer Barracks, Smith Street (ID 3031)
- Lancer Barracks Precinct, Smith Street (ID 16728)
- Lennox House and Outbuilding, 39 Campbell Street (ID 19774)
- Old Government House, Parramatta Park (ID 3036)
- Parramatta Park (ID 3072)
- Public School (former) and Convict Wall, 175 Macquarie Street (ID 3097)
- St Johns Anglican Provisional Cathedral (ID 3041)

- St Johns Cemetery and Boundary Wall (ID 3071)
- Town Hall, 182 Church Street (ID 3086)

2.7.2 National Trust of Australia (NSW)

Listing on the National Trust Heritage Register (NTHR) does not impose statutory obligations and is more an indication of the heritage esteem held by the community. The following NTHR items have been identified in/in the vicinity of the study area:

- Railway Station (NT 9428)

2.8 Summary of heritage listings

2.8.1 Heritage items in the vicinity

A radius of 500m has been used to determine the impact of the proposed development on heritage items in the vicinity, as shown in Figure 3. Heritage items in the vicinity of the subject site, which may be impacted by the proposed development, are listed in Table 1.

The nature of the proposed development is such that the visibility of the new tower would extend beyond the 500m radius. For this reason, the following items have also been included in the assessment:

- Old Government House and Domain (WHL no 1306)
- Hambledon Cottage, Grounds and Archaeology (SHR no 01888)
- Elizabeth Farm (SHR no 0001)

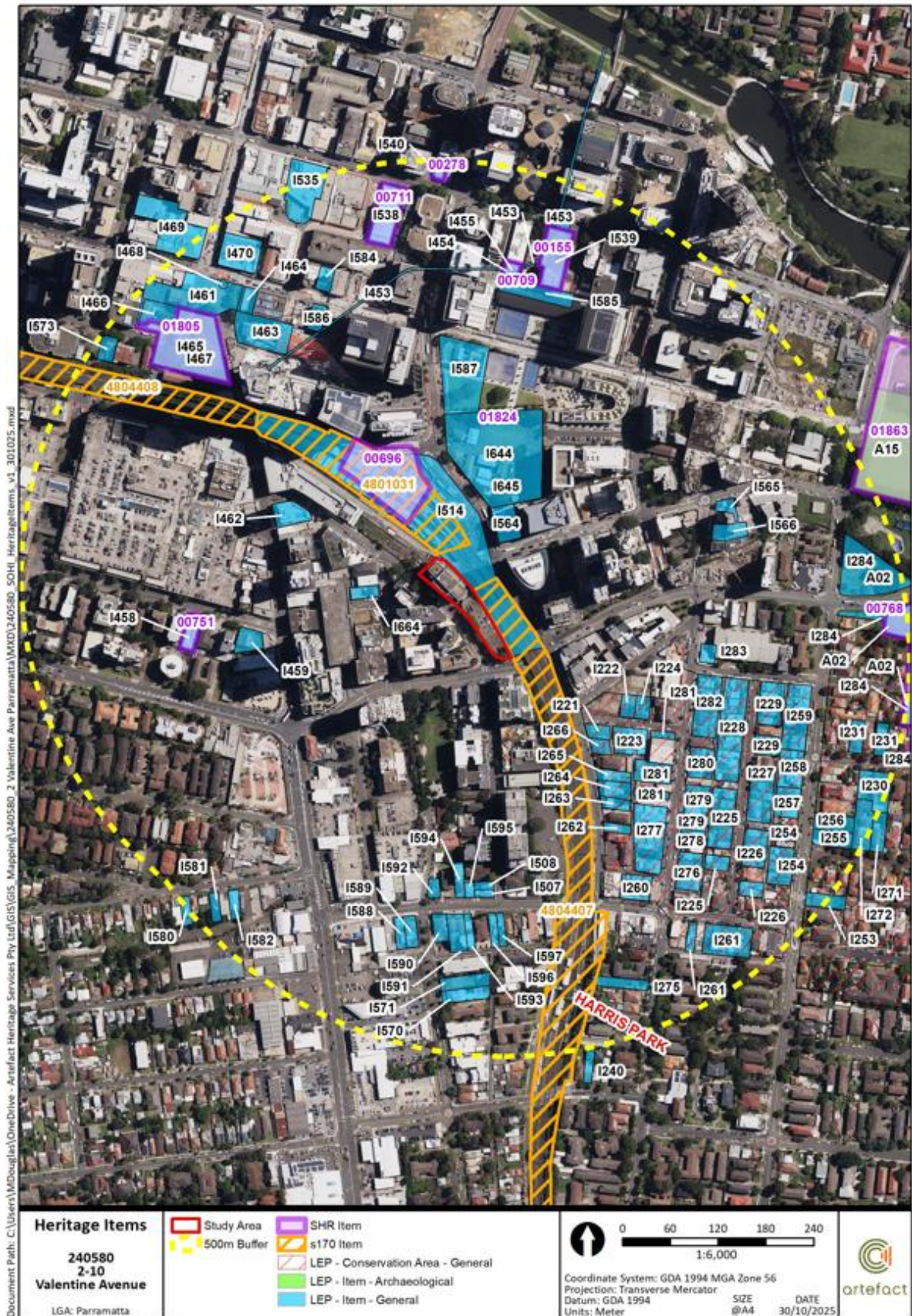


Figure 3. Map of the Study Area including gazetted heritage items and conservation areas
(Source: Artefact 2025)

Table 1: Results of register searches for the subject site and heritage items in the vicinity that may be impacted by the proposal.

Register	Subject site	Items in the vicinity of the subject site
World Heritage List	Not Listed	Old Government House and Domain (as part of the 11 Australian Convict Sites World Heritage serial listing)
National Heritage List	Not Listed	Old Government House and the Government Domain
Commonwealth Heritage List	Not Listed	Lancer Barracks Precinct
State Heritage Register	Not Listed	- Parramatta Railway Station (SHR no 00696) - St John's Anglican Cathedral (SHR no 01805) - Lennox House (SHR no 00751) 1st/15th Royal NSW Lancers Memorial Museum Collection (SHR no 01824) - Warders Cottages (SHR no 00709) - Perth House and Stables (SHR no 00155) - Experiment Farm Cottage (SHR no 00768) - Roxy Theatre (SHR no 00711) - Shop and Office (SHR no 00278) - Hambledon Cottage, Grounds and Archaeology (SHR no 01888) - Elizabeth Farm (SHR no 00001)
Section 170 Registers (NSW Transport Asset Manager s170)	Not Listed	- Parramatta Park and Old Government House (Railway line only) - Parramatta Railway Station Group - Parramatta Station to Parramatta Road Railway Line (Archaeological Site) - Parramatta Station to Pitt Street Railway Line (Archaeological Site)

Register	Subject site	Items in the vicinity of the subject site
Parramatta LEP 2023	Not Listed	• Single Storey Shop (I283) • Convict Drain (I453) • Cottage and potential archaeological site (I454) • Warders Cottages (I455) • Lennox house and adjoining brick wall on footpath (I458) • Masonic Centre (I459) • Bicentennial Square and adjoining buildings (I461) • Shop (former Fire Station) (I462) • Parramatta Town Hall and potential archaeological site (I463) • Murrays Building and potential archaeological site (I464) • St Johns Anglican Cathedral (I465) • St Johns Parish Hall (I466) • Wardens Cottage, also known as Verger's Cottage (I467) • Centennial memorial Clock (I468) • Horse Parapet Façade and potential archaeological site (I470) • Llonells (I507) • Jeshyron (I508) • Parramatta Station (I514) • Shops and potential archaeological site (I535) • Roxy Cinema (I538) • Perth House, Moreton Bay Fig Tree and potential archaeological site (I539) • Commercial Hotel (I 564) • Single storey residence (I570) • Single storey residence (I571) • Two Storey Residence (I573) • Cottage (I580) • Semi-detached Cottage (I581) • Semi-detached Cottage (I582) • Kia Ora and potential archaeological site (I584) • Convict Barracks Wall (I 585) • Leigh Memorial Uniting Church (I 586) • Arthur Philip High School and potential archaeological site (I 587) • House/Industrial (I588) • Single storey residence (I589) • Residence – Mona (I590) • Attached House and Office (I591) • Single storey residence (I592) • Attached House and Office (I593) • Single storey residence (I594) • Single storey residence (I595) • Single storey residence (I596) • Single storey residence (I597) • Lancer Barracks Group (I 645) Lancer Barracks Group I645 • Attached Houses (I 664) • Harris Park West Conservation Area (heritage items located within the Conservation area have not been listed individually) • Experiment Farm Conservation Area (heritage items located within the Conservation area have not been listed individually)

Register	Subject site	Items in the vicinity of the subject site
Register of the National Estate (RNE) (Non-Statutory)	Not Listed	• Auxiliary Buildings former Kings School, Marsden Street, Parramatta (ID 3076) • Brislington, George Street, Parramatta (ID 3021) • Centennial Clock, Church Street, Parramatta (ID 3087) • Central Block Former Kings School, Marsden Street, Parramatta (ID 12391) • Cottage 12 O'Connell Street (ID 3083) • Cottage 14 O'Connell Street (ID 3084) • Elizabeth Farm House, 70 Alic Street (ID 3024) • Hambleson, 47 Hassall Street (ID 3079) • Headmasters Residence Former Kings School (ID 3075) • Kia Ora (former) 64 Macquarie Street (ID 3088) • Kings School (former) Group, Marsden Street (ID 149390) • Lancer Barracks, Smith Street (ID 3031) • Lancer Barracks Precinct, Smith Street (ID 16728) • Lennox House and Outbuilding, 39 Campbell Street (ID 19774) • Old Government House, Parramatta Park (ID 3036) • Parramatta Park (ID 3072) • Public School (former) and Convict Wall, 175 Macquarie Street (ID 3097) • St Johns Anglican Provisional Cathedral (ID 3041) • St Johns Cemetery and Boundary Wall (ID 3071) • Town Hall, 182 Church Street (ID 3086)
National Trust of Australia (NTHR) NSW Register (Non-Statutory)	Not Listed	• Railway Station (NT 9428)

3.0 HISTORICAL BACKGROUND

3.1 Aboriginal history

Parramatta is in the centre of traditional Darug Country in what in 1788 Governor Arthur Phillip named the County of Cumberland. The Cumberland Plain is a biological and geological (biogeographic) feature of the Sydney Basin, the major geological basin extending from the elevated coastal sandstone formations at the Sydney coast in the east, to the Dyarubbin or Hawkesbury-Nepean River in the west and south. The mildly undulating plains consist of soils that have formed through millennia of alluvial deposition and are punctuated with occasional rocky outcrops such as at Prospect Hill. Over the entire plain there are over 100 creeks and nine rivers, of which the Parramatta River rises in predominantly grassy or open woodlands to the west.²

The river was navigable by boats to a point at modern day Parramatta where it narrows and becomes rocky. At the confluence of brackish tidal waters and freshwater, the Burramattagal could catch flathead and mullet fish, tortoises, mussels, oysters, crabs, prawns, freshwater crayfish and other fish. Governor Phillip soon declared Burramattagal land to be 'good country' for farming and 'to be settled' as soon as the colonists were able to.³

Parramatta, accessible by boat, with fresh water and surrounded by open woodlands, was of strategic military importance to the colony as well. The first structure was a redoubt or small fort and the location chosen as the second seat of government. As historian Grace Karskens notes, Governor Phillip's attitude towards the Darug people at Parramatta was strikingly different to his attempts to gain the confidence of people such as Bennelong around Sydney Cove – 'there were no meetings, no dancing, no gifts or high hopes of "living in amity"...the settlement of Parramatta was a true invasion, with well-organised military defences.'⁴

The colonists were correct in their fears of conflict and the threat Aboriginal warriors posed to their precious stock and maize crops that were spreading out into numerous small settlements. In mid 1791, the small group of farms at the foot of nearby Prospect Hill came under attack from 'more than one hundred' warriors in one raid, and were attacked several times over the next months requiring soldiers to be sent out from Parramatta. Between 1791 and 1794 several colonists in the districts around Parramatta were attacked and some were killed by warriors. David Collins noted their attacks and raids had become 'frequent and extensive' and in April 1794, one raid on the Government Farm at nearby Toongabbie turned into a battle between constables and warriors.⁵

Ongoing resistance warfare came to a head in 1797 when Pemulwuy led a large force of warriors into the township of Parramatta itself. In what has become known as the Battle of Parramatta, at least five warriors were killed, and Pemulwuy and others were wounded. Pemulwuy received 'seven buck shots in his head and other parts of his body', yet soon escaped captivity, it was rumoured by both colonists and Aboriginal people alike that Pemulwuy 'could not be killed' by firearms. Pemulwuy's resistance continued, with several escaped convicts apparently joining forces with his guerrilla warband. By 1801, Governor King had had enough and issued orders to the settlers to 'drive back the hordes of natives' around Parramatta, the Georges River and Prospect Hill. In November, rewards were offered

² Birch, *A Short Geological and Environmental History of the Sydney Estuary*, 2007, pp217-219

³ White, *Journal of a Voyage*, p. 128; Collins, *An Account*, p. 462; Hunter, *An Historical Journal*, p. 61; Phillip to Sydney, 15 May 1788, HRNSW,1, 2, p. 133

⁴ Karskens 2017: Philip, *Journal*, 1793, p. 299. For an overview of the military occupation of Parramatta see Gapps, *The Sydney Wars*, pp. 46-48

⁵ Gapps, *The Sydney Wars*, 2018, pp. 96-7, 104-5; Collins, 1879, *An Account*, pp. 304-5

including free pardons for convicts. Pemulwuy, wanted 'dead or alive', was shot and killed in June 1802.

3.2 Early European colonisation

3.2.1 Colonisation

After Sydney was colonised in 1788, Governor Phillip started exploration for arable farming land. In November 1788, Governor Phillip, the Surveyor-General, two officers and a small party of marines went up "the Crescent" and chose a location for an agricultural settlement, which they named Rose Hill. A party of ten convicts with knowledge of agriculture were sent to Rose Hill and land was ordered to be cleared for cultivation, and a redoubt (a temporary fortification) was built to guard the settlement.⁶

By July 1789, the convicts had built huts, gardens, a barrack for the soldiers in the redoubt, a provision store, a small house for the superintendent, a barn and granaries.⁷ These early buildings can be seen on Bradley's plan of the river prepared in 1789. In 1790, lines were laid for a town, with a principal street commencing near the landing-place and extending west one mile to the foot of the rising ground of Rose Hill. One each side of the street, huts which could accommodate ten persons were built with gardens in the rear.⁸ The production of bricks for the construction of barracks and a storehouse/provision stores for the settlement commenced in 1790. Construction of the storehouse was completed in November 1790.

Watkin Tench, Lieutenant in the Marine Corps on the First Fleet, visited Rose Hill in November 1790 and walked around the cleared and cultivated land and the new town of Parramatta. By then 32 of the accommodation huts for convicts were completed. Tench described the progress of the town including the barracks and a new brick storehouse in his journal:

Of public buildings, besides the old wooden barrack and store there is a house of lath and plaster, forty-four feet long by sixteen wide, for the governor, on a ground floor only, with excellent outhouses and appurtenances attached to it. A new brick storehouse covered with tiles, 100 feet long by twenty-four wide is nearly completed; and a house for the storekeeper. The first stone of a barrack, 100 feet long by twenty-four feet wide to which are intended to be added wings for the officers, was laid today. The situation of the barrack is judicious being close to the storehouse and within 150 yards of the wharf, where all boats from Sydney unload. To what I have already enumerated must be added an excellent barn, a granary, an enclosed yard to rear stock in, a commodious blacksmith's shop, and a most wretched hospital...⁹

Judge Advocate and Secretary of the colony, David Collins visited Rose Hill in April 1791, noting an officers barracks; a small guard-house near the Governor's hut, a small house for the judge-advocate and for the clergyman were being constructed

The town of Parramatta was bounded by the Western Road to the south and by the Governor's Estate to the north. To the east and southeast there were land grants attributed to John Macarthur,

⁶ David Collins, *An Account of the English Colony of New South Wales*, Vol. 1, first published 1798, this edition published 1975, A.H. and A. W Reed, Sydney.

⁷ David Collins, *An Account of the English Colony of New South Wales*, Vol. 1, 60.

⁸ David Collins, *An Account of the English Colony of New South Wales*, Vol. 1, 103.

⁹ Tim Flannery, *Watkin Tench's 1788*: Edited and introduced by Tim Flannery (from the original published 1789). The Text Publishing Company Melbourne, 2009, 156.

James Ruse, John Harris, William Balmain and D'Arcy Wentworth (granted by 1790's).¹⁰ In this phase the study area was marked out for agricultural use noted in historical mapping as 'Ground in Cultivation' (see Figure 3).

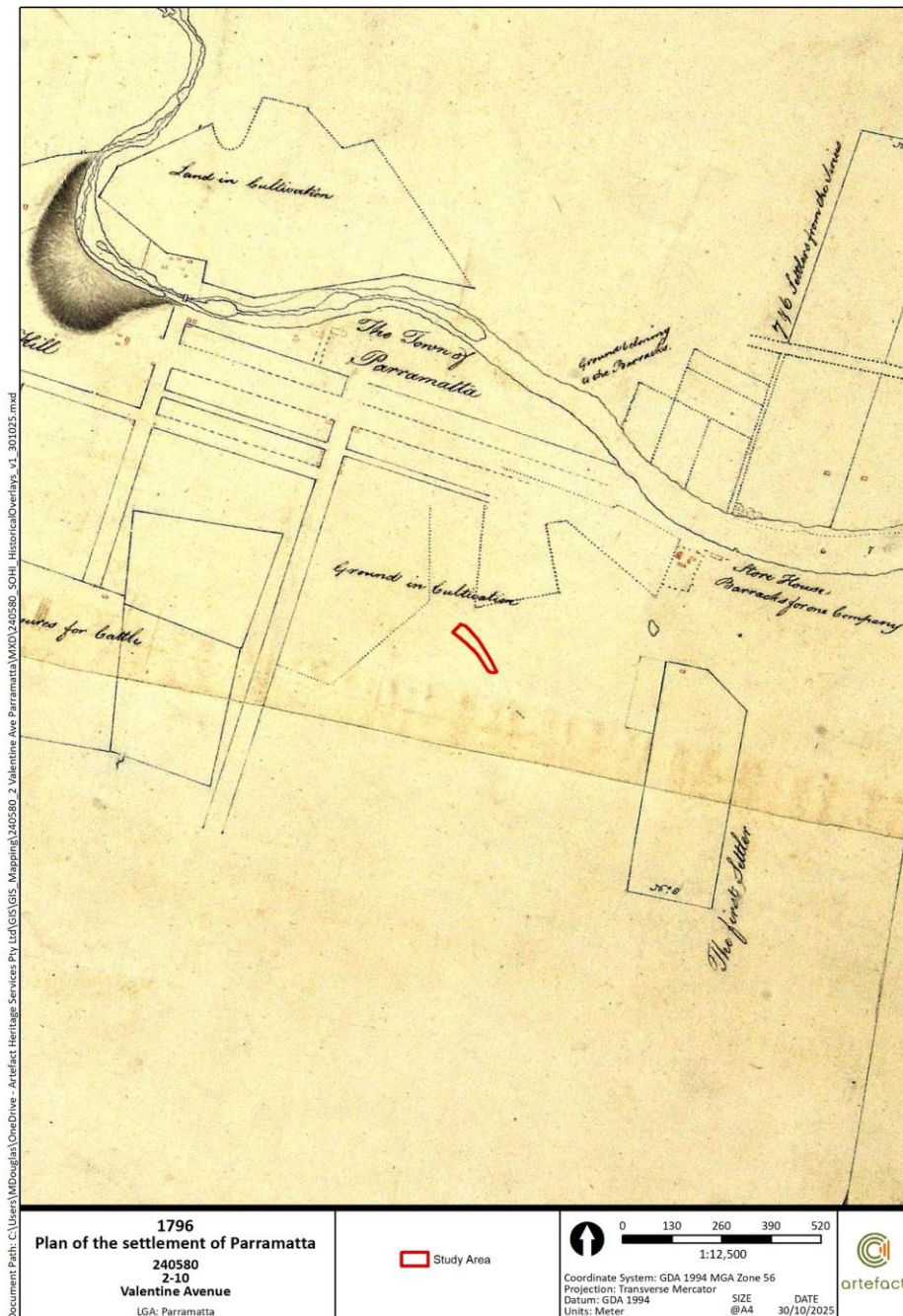


Figure 4: 1796 Plan of the settlement of Parramatta made by Governor Hunter show no development within the study area. (Source: SLNSW, CY 1378 (microfilm copy), BT 36/Series 1/Map 17)

¹⁰ Kass & Lion, *Parramatta: A Past Revealed*, p. 118

Convicts were soon sent to the settlement, now known as Parramatta Park and the area was cleared of trees and planted with crops, which became Government Farm. Government House was constructed near the farm and prompted the development of the town of Parramatta. The town itself was planned along a long main street now called George Street which linked Government House to the original landing place. On 2 June 1791, Governor Phillip renamed it Parramatta using the local name used by the Burramattagal, which was the first settlement to use an Aboriginal name.¹¹

By this time Parramatta had transformed from a convict settlement to a township and became the regional centre. The 1840s saw a decline in the economy at Parramatta as convicts ceased to be transported to Australia and the convict buildings in the area began to be converted into public institutions.

3.2.2 Wentworth family land lease and grant (1799 – 1872)

The study area was part of a larger area originally leased to D'Arcy Wentworth in 1799. Having built a house and made improvements, Wentworth's lease was renewed in 1806 and then converted to a grant in 1810. The house was named after a famous estate in South Yorkshire, England, frequented by Wentworth and described as:

Wentworth Woodhouse', was set among trees and a feature of many views of early Parramatta (see Figure). By the time it was completed in 1803, 'Wentworth Woodhouse' was one of the finest houses in the colony. Extensive gardens and orchards completed the opulent estate.¹²

In 1819 the estate was expanded reaching a total of thirty-one acres.¹³



Figure 5: 1804-1805 High Street [now George Street] Parramatta, from the gates of Government House, around 1804-1805 (Source: SLM - Caroline Simpson Library & Research Collection)

¹¹ Kass, 2008, Parramatta – <http://dictionaryofsydney.org/entry/parramatta>

¹² St. Johns Online, Catherine Crowley: A Convict Sea Wife - https://stjohnsonline.org/bio/catherine-crowley/#_edn38

¹³ Austral 2008 5-7 Parkes Street SoHI pg. 17

Following Wentworth's death in 1827, the land, house and all other premises were bequeathed to his son, William Charles Wentworth. By 1844 a series of buildings had been constructed. The 1844 plan of the town of Parramatta (Figure 6) shows 'Wentworth Woodhouse' as a small cluster of buildings located to the rear the corner of Fitzwilliam and Wentworth Streets.



Figure 6: Plan of the Town of Parramatta and the Adjacent Properties, as surveyed by W. Meadows Brownrigg (1844) (Source?)

The Wentworth building cluster was shown in 1856 as including a series of outbuildings located to the east of the main house (Figure 7).

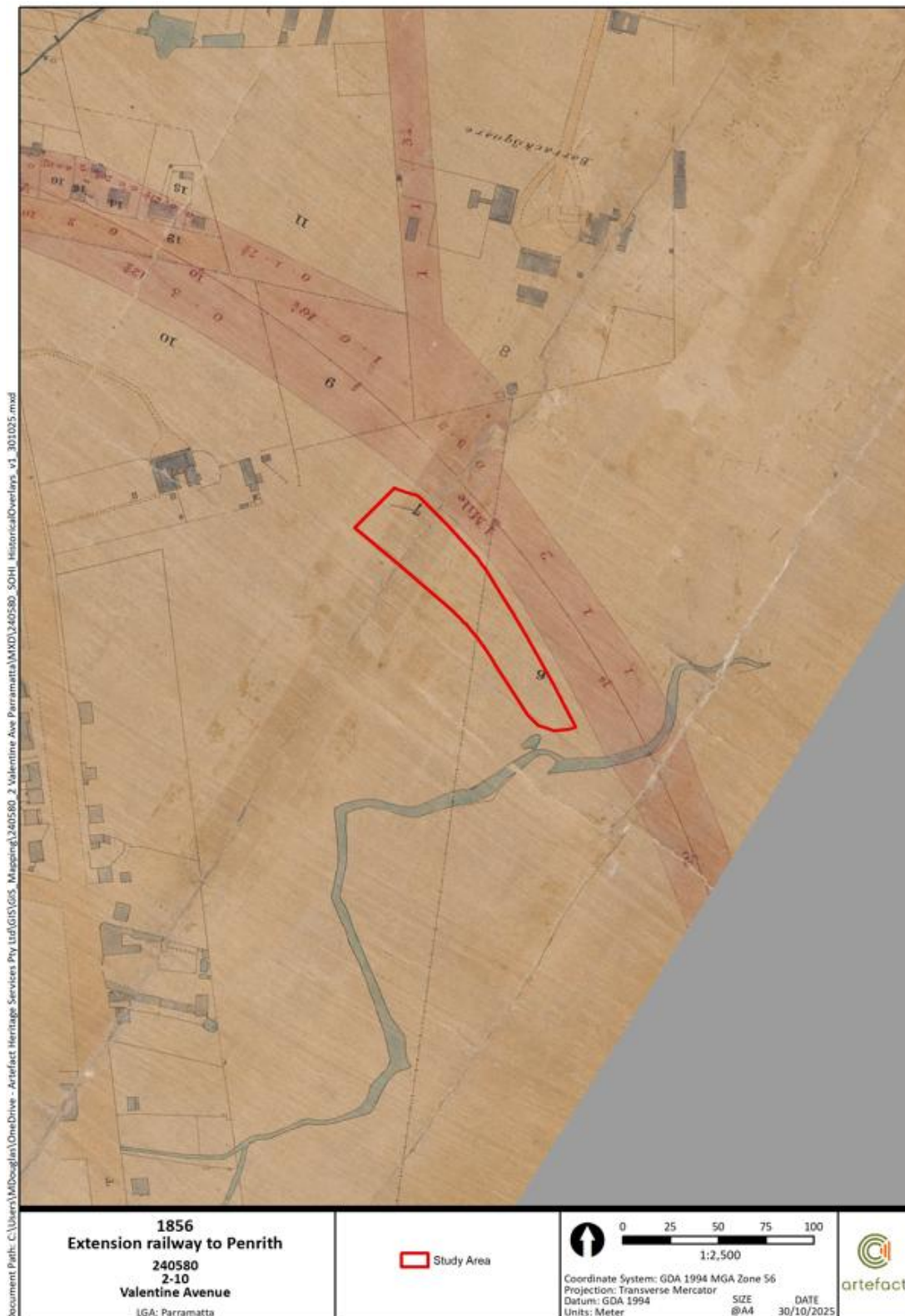


Figure 7: 1856 Map of extension railway to Penrith showing subject site in red (Source?)

3.3 Late nineteenth century subdivision (1873-1895)

By 1872 when William Wentworth passes away, the Wentworth Estate is described as:

...a number of small timber cottages and a two-storey brick inn on the eastern side of Church Street, between the town markets on the corner of Macquarie Street and the railway, and the Wentworth Woodhouse estate to the south of the railway.¹⁴

Following William Wentworth's death the estate was subdivided which opened the area to development (Figure 8).

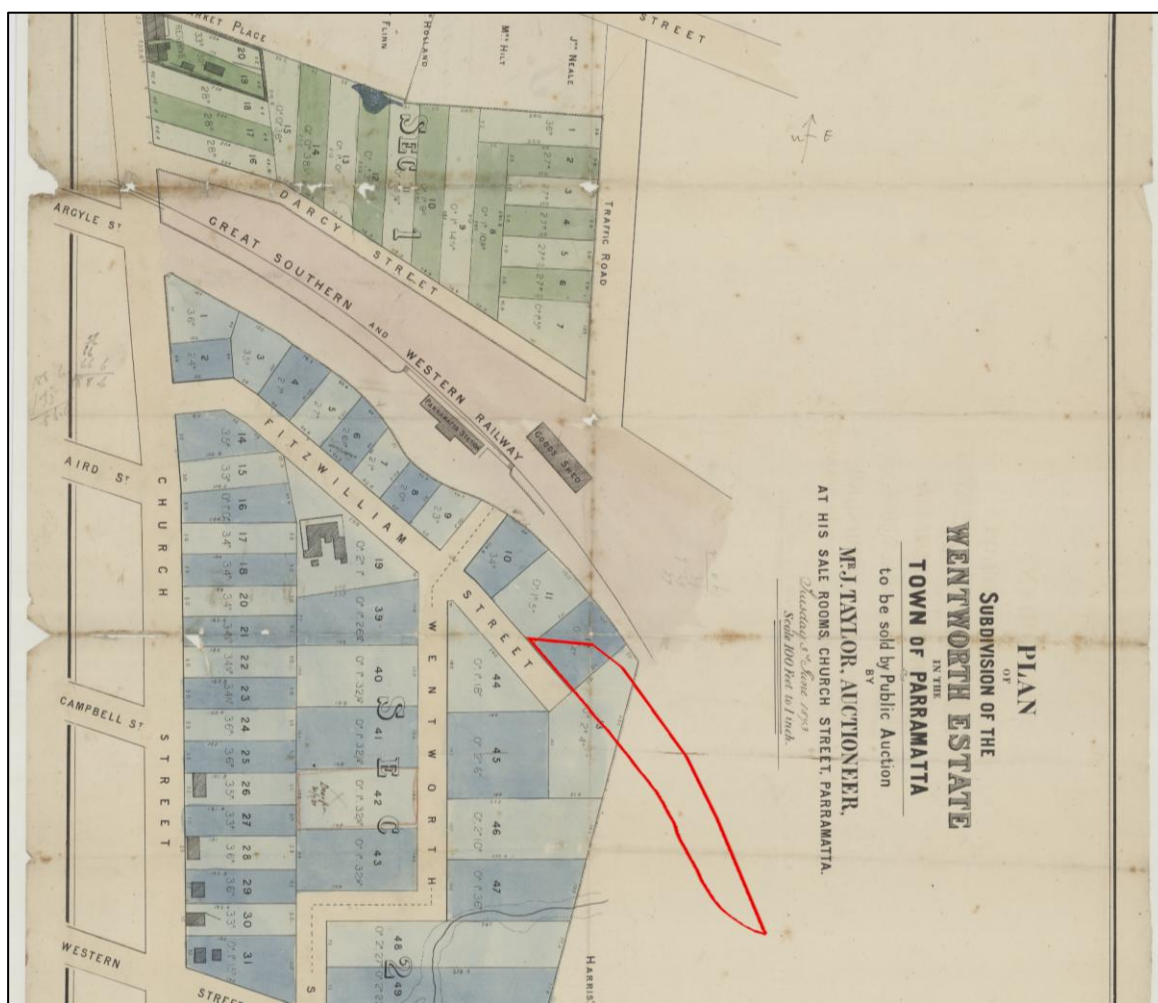


Figure 8. 1873 Plan of Subdivision of the Wentworth Estate in the Town of Parramatta shows new Darcy, Fitzwilliam and Wentworth Streets, with the study area outlined in red (Source: SLNSW)

By 1882, Valentine Ave (formerly named Cowper St until 1926, then Valentine Lane until 1934) had been subdivided into lots intended for residential development; by 1892, the southern side of the street featured a substantial number of terrace houses (Figure 9).¹⁵ These terraces were demolished

¹⁴ Kass & Lion, *Parramatta: A Past Revealed*, p. 187

¹⁵ Godden Mackay Logan, 2004, *Parramatta Transport Interchange Archaeological Management Plan*, p.38

when Valentine Lane was realigned and widened in 1934, and were replaced by freestanding cottages.¹⁶ The terraces were located outside of the current study area.



Figure 9. 1894 plan of Parramatta, with the study area outlined in red and terraces indicated with a blue arrow (Source: Sydney Water Plan Room)

3.4 Construction of Austral Flour Mills (1895-1986)

The area along the northeastern side of Valentine Ave was the site of the former Austral Flour Mills (Figure 10) which were constructed by Peter Noller, builder and Mayor of Parramatta, between 1895 and 1906.¹⁷ The mills were purchased by the McCorquodale Bros in 1910, a family-owned milling company founded by Scottish migrants in 1896.¹⁸ They produced the Crown Brand of flour which was distributed domestically and abroad,¹⁹ and by 1961 the company became the main producers of flour for the Arnott's biscuit factory in Homebush. In 1973 Arnott's became majority owners of the McCorquodale Bros. milling company.²⁰

¹⁶ Godden Mackay Logan, 2004, p. 38

¹⁷ Godden Mackay Logan, 2004, p. 38

¹⁸ McCorquodale, John, 2021 *The history of McCorquodale Bros and Arnott's Milling Division*, p. 2. The Cumberland Argus and Fruitgrowers Advocate (Parramatta, 1888-1950) Sat 26 Feb 1901, p.6. <https://trove.nla.gov.au/newspaper/article/86005770>

¹⁹ The Cumberland Argus and Fruitgrowers Advocate, 1940, *McCorquodale Bros. Austral Flour Mills*

²⁰ McCorquodale, John, 2021, p. 7

The mills remained standing until 1986, when they were demolished to make way for the extant building and carpark in the study area. Aerial photographs from the 1940s and 50s (Figure 13, Figure 14) indicate that the space south of the mill in the study area remained vacant. Between 1965 and 1978, (Figure 15, Figure 16), the mill expanded southward, with additional structures (predominantly storage spaces and silos) being constructed adjacent to the railway corridor (Figure 11).

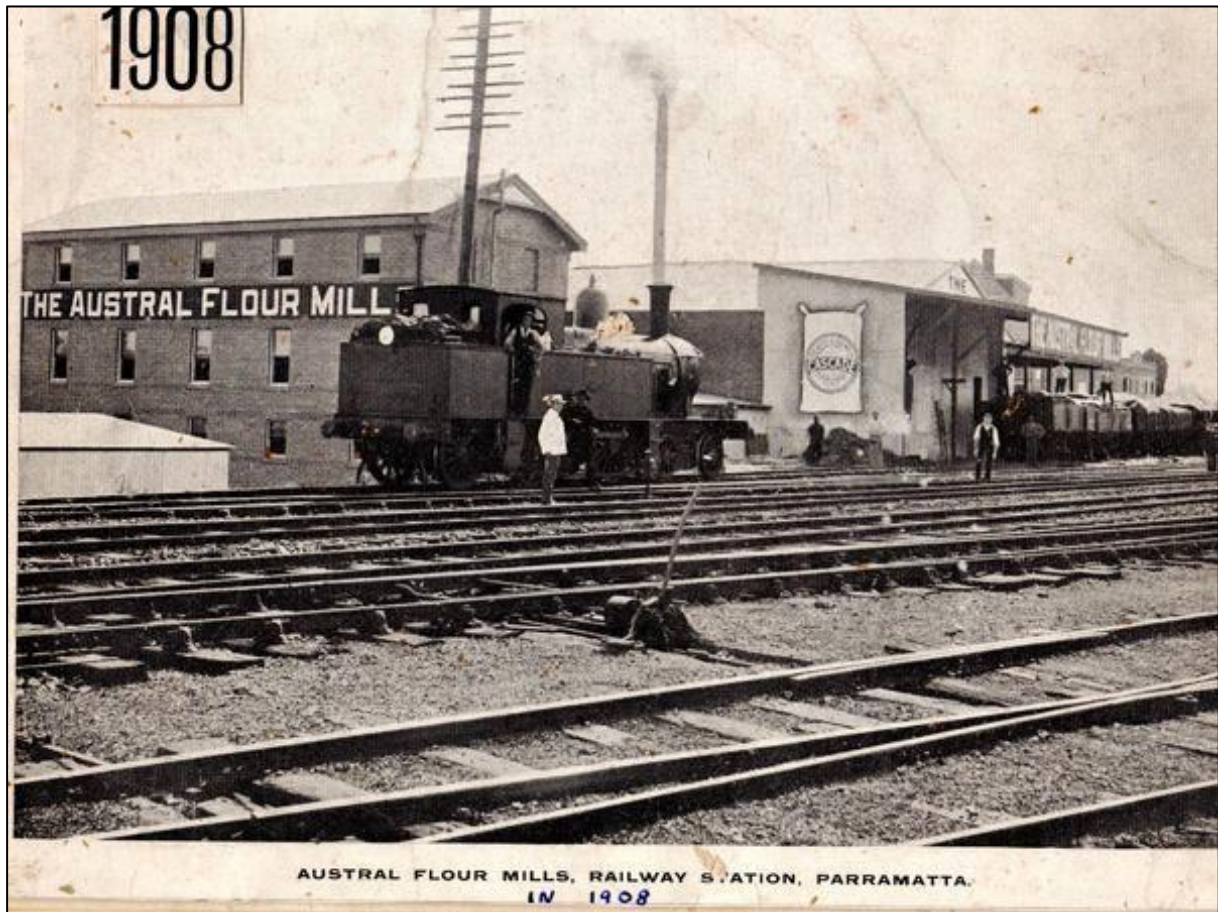


Figure 10. 1908 photograph of the Austral Flour Mill next to a siding at Parramatta Station
(Source: Mills Archive Trust)



Figure 11. Four 500 ton silos next to the Austral Flour Mill, c. 1960s (Source: McCorquodale, 2021)



Figure 12. Photograph of the mill's stockfeed outloading bins, with four 1000 ton concrete silos behind (Source: John McCorquodale, 2021)



Figure 13: 1943 Aerial image showing the subject site in red (Source: Spatial Viewer, annotated by Artefact 2025)



Figure 14: 1955 Aerial showing the subject site in red (Source: Spatial Viewer, annotated by Artefact 2025)



Figure 15: 1965 Aerial showing the subject site in red (Source: Spatial Viewer, annotated by Artefact 2025)



Figure 16: 1978 Aerial showing the subject site in red (Source: Spatial Viewer, annotated by Artefact 2025)

3.5 Late twentieth century development (1986-present)

The site of the former Austral Flour Mills is partly occupied by the current study area. Aerial photography (Figure 17) indicates that the mill was demolished and replaced by the building currently occupying the study area by 1986. Outside of the mill building's footprint, aerial photography indicates that the subject site was used as an at grade parking area or open space until the 1980s when a multi-story carpark was constructed (Figure 17). The 1986 building and carpark represent the extant development in the study area, and no substantial modifications to their footprints are visible in the aerials after 1986 (Figure 18 to Figure 20).



Figure 17: 1986 Aerial showing the subject site in red (Source: Spatial Viewer, annotated by Artefact 2025)



Figure 18: 1994 Aerial showing the subject site in red (Source: Spatial Viewer, annotated by Artefact 2025)



Figure 19: 2013 Aerial showing the subject site in red (Source: Spatial Viewer, annotated by Artefact 2025)

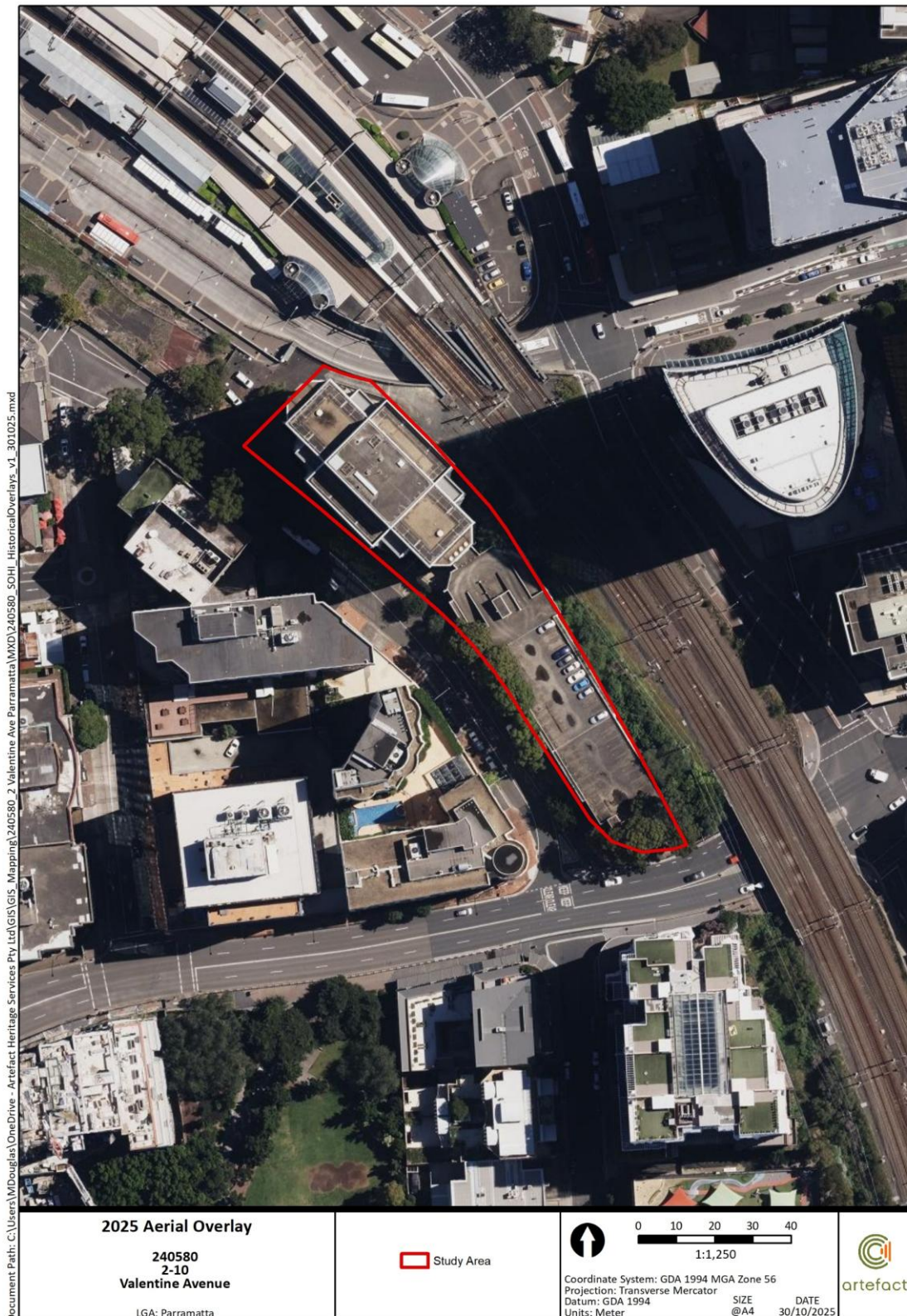


Figure 20: 2025 Aerial showing the subject site in red (Source: Spatial Viewer, annotated by Artefact 2025)

4.0 PHYSICAL CONTEXT

4.1 Site Inspection

A site inspection was conducted on 24 October 2025 by Danial Dompierre-Outridge (Heritage Consultant) and Sasha Douglas (Heritage Consultant) of Artefact Heritage. The aim of the site inspection was to inspect the area of proposed impacts, inform a preliminary assessment of archaeological potential, and to identify heritage items and heritage significant fabric of the item and in the vicinity that may be affected by the project. The inspection was undertaken on foot and a photographic record was made. Photographs included in this section are taken by Artefact unless noted otherwise.

4.1.1 Context

The site is located at 10 Valentine Avenue, Parramatta, also known as Lot 2 DP 1119257. The site is approximately 19km northwest of the Sydney CBD and is within the City of Parramatta Local Government Area.

Parramatta is Sydney's second largest employment hub. The subject site is within the Parramatta CBD in close proximity to the Parramatta Railway Station and 500m from the planned Parramatta Metro Station. The primary frontage of the site is along Valentine Avenue with pedestrian access also via Argyle Street. The extant building includes a subsurface garage, however it is unknown to what depth or breadth it extends. The carpark in the southern portion of the study area is at street level, and no subsurface parking levels are visible. Landscaping and ground-penetrating services are visible in the study area.



Figure 21. View southeast toward the study area on Valentine Ave



Figure 22. View of the extant buildings occupying the study area, facing northeast on Valentine Ave



Figure 23. View of the extant buildings occupying the study area, facing southeast on Valentine Ave



Figure 24. View of the Valentine Ave corridor, facing northwest from the study area



Figure 25. View of the southeast corner of the study area, facing north on Valentine Ave

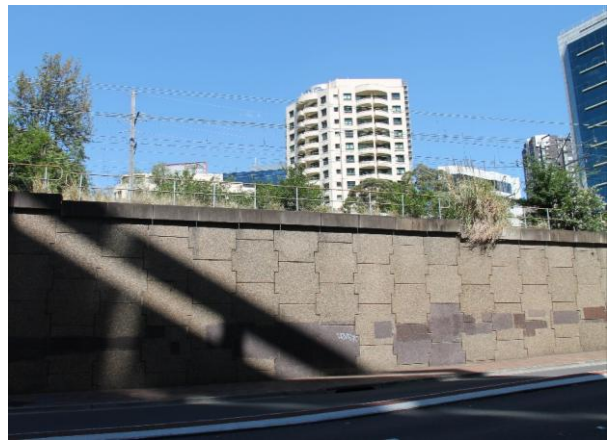


Figure 26. View toward the study area, facing southwest on Station St East

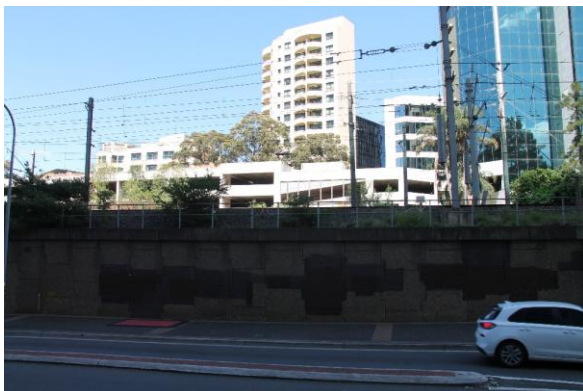


Figure 27. View toward the study area, facing south on Station St East



Figure 28. View toward the study area, facing southeast on Station St East



Figure 29. View of Parramatta Station (SHR no. 00696), facing north from Fitzwilliam St, west of the study area



Figure 30. View of Parramatta Station (SHR no. 00696), facing northwest from Fitzwilliam St, west of the study area



Figure 31. View of developments adjacent to Parramatta Station (SHR no. 00696), facing west on Station St East, northwest of the study area



Figure 32. View toward the study area (left) over Parramatta Station (SHR no. 00696), facing southeast on Station St East



Figure 33. View of the Lancer Barracks heritage precinct (LEP no. I645), northwest of the study area, facing northeast on Smith St



Figure 34. View toward the study area from the Lancer Barracks heritage precinct (LEP no. I 1645) entrance, facing southeast



Figure 35. View toward the study area, facing southeast on Smith St



Figure 36. View in the direction of the study area, facing southeast on Macquarie St



Figure 37. View of Leigh Memorial Church (LEP no. I586), northwest of the study area, facing southwest

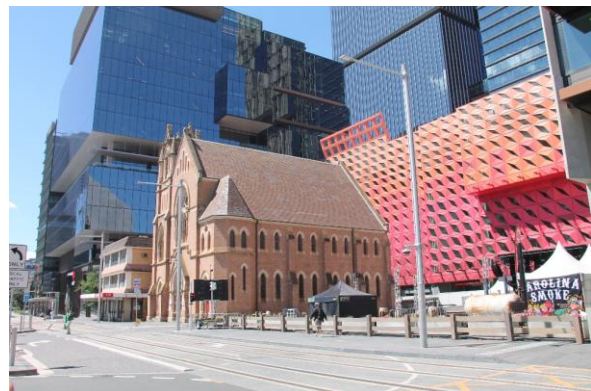


Figure 38. View of Leigh Memorial Church (LEP no. I586), facing southeast in the direction of the study area



Figure 39. View of St John's Anglican Cathedral (SHR no. 01805) northwest of the study area, facing south



Figure 40. View of St John's Anglican Cathedral (SHR no. 01805) facing southeast in the direction of the study area



Figure 41. View in the direction of the study area, facing southeast on Church St



Figure 42. View in the direction of the study area, facing southeast on Church St



Figure 43. View in the direction of the study area, facing southeast from Lennox Bridge (SHR no. 00750)



Figure 44. View of Lennox Bridge (SHR no. 00750) in the direction of the study area, facing southeast from the north bank of the Parramatta River



Figure 45. View in the direction of the study area, facing southeast from the north bank of the Parramatta River adjacent to Lennox Bridge (SHR no. 00750) (right of frame)



Figure 46. View of Prince Alfred Square (SHR no. 01997) in the direction of the study area, facing southeast from Victoria Rd



Figure 47. View of St Patrick's Cathedral, northwest of the study area, facing south on Victoria Rd (LEP no. I598)



Figure 48. View of St Patrick's Cathedral (LEP no. I598), in the direction of the study area, facing southeast on Victoria Rd



Figure 49. View of the former Kings School group (SHR no. 00771) in the direction of the study area, facing southeast on O'Connell St



Figure 50. View in the direction of the study area, facing southeast from CommBank Stadium



Figure 51. View in the direction of the study area, facing southeast from the O'Connell St stadium carpark



Figure 52. View in the direction of the study area, facing southeast from Noller Bridge over the Parramatta River



Figure 53. View in the direction of the study area, facing southeast from the front lawn of Old Government House (SHR no. 00596)



Figure 54. View of Old Government House (SHR no. 00596), northwest of the study area, facing east

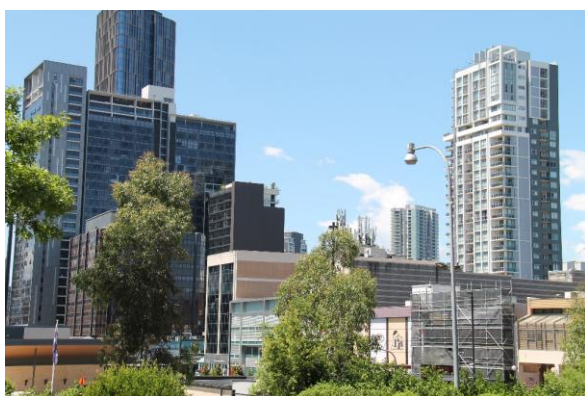


Figure 55. View in the direction of the study area, facing southeast from the Macquarie St entrance to Old Government House (SHR no. 00596)



Figure 56. View of the southern boundary of Elizabeth Farm (SHR no. 00285) east of the study area, facing west on Alice Street



Figure 57. View in the direction of the study area, facing west from the west boundary of Elizabeth Farm Reserve (SHR no. 00285)



Figure 58. View in the direction of the study area, facing west from the northwest corner of the Elizabeth Farm Reserve (SHR no. 00285)



Figure 59. View in the direction of the study area, facing northwest from Prospect St and the south edge of the Elizabeth Farm Conservation Area (LEP HCA)

4.1.2 Site

The subject site is located within the City of Parramatta (LGA, approximately 19km northwest of Sydney CBD and 16km northeast of Liverpool CBD). The site covers 3,937m² and is legally described as Lot 2 in DP 1119257.

The southern part of the site (2 Valentine Avenue) is currently occupied by six-level above ground carpark with 286 Spaces. The northern portion of the site (10 Valentine Avenue) is occupied by 13-storey commercial office building with basement levels. The proposal will occupy the southeastern portion of the site, which is currently the six level car park. Vehicular access into the site is available via the combined entry in the existing commercial building at 10 Valentine Avenue. An additional egress point from the above ground carpark is located to the south of the entry and provides exit only access onto Valentine Avenue.

The site is positioned within the Parramatta CBD, which is approximately 19km northwest of the Sydney CBD and 16km northeast of the Liverpool CBD. The site is located just southeast of Parramatta Railway Station, approximately 440 metres from the planned Parramatta Metro Station. It is also approximately 2 kilometres southeast of the future Westmead Metro Station on the eastern side of Hawkesbury Road.

5.0 ARCHAEOLOGICAL RESOURCES

5.1 Archaeological Potential

5.1.1 Introduction

The archaeological potential of each site is presented in terms of the likelihood of the presence of archaeological remains, considering the land use history and previous impacts at the site. This evaluation is presented using the following grades of archaeological potential:

Table 2: Grading of archaeological potential

Grading	Rationale
Nil	No evidence of historical development or use, or where previous impacts would have removed all archaeological potential
Low	Research indicates little historical development, or where there have been substantial previous impacts, disturbance and truncation in locations where some archaeological remains such as deep subsurface features may survive
Moderate	Analysis demonstrates known historical development and some previous impacts, but it is likely that archaeological remains survive with some localised truncation and disturbance
High	Evidence of multiple phases of historical development and structures with minimal or localised twentieth century development impacts, and it is likely the archaeological resource would be largely intact

5.1.2 Previous relevant investigations

Fitzwilliam and Argyle Streets, Parramatta Historical Archaeological Assessment (Artefact, 2022)

In 2022, Artefact were engaged by Transport for NSW (TfNSW) to prepare a historical archaeological assessment report (HAA) to assess the archaeological potential of the area comprising Lots 204 and 205, DP 1095620, which is located adjacent to the current study area. The HAA identified **low-to-moderate** potential for the lots to contain remains related to the Estate Subdivision Commercial Development (Phase:1873-2004) that if discovered intact would likely reach the threshold for local significance. Remains associated with this phase would likely include evidence of brick, building footings, flooring, cess pits, wells, fence posts, and isolated artefacts. Other historical phases were

assessed as having **nil to low** potential for survival due to ground disturbance caused by subsequent developments in the lots.²¹

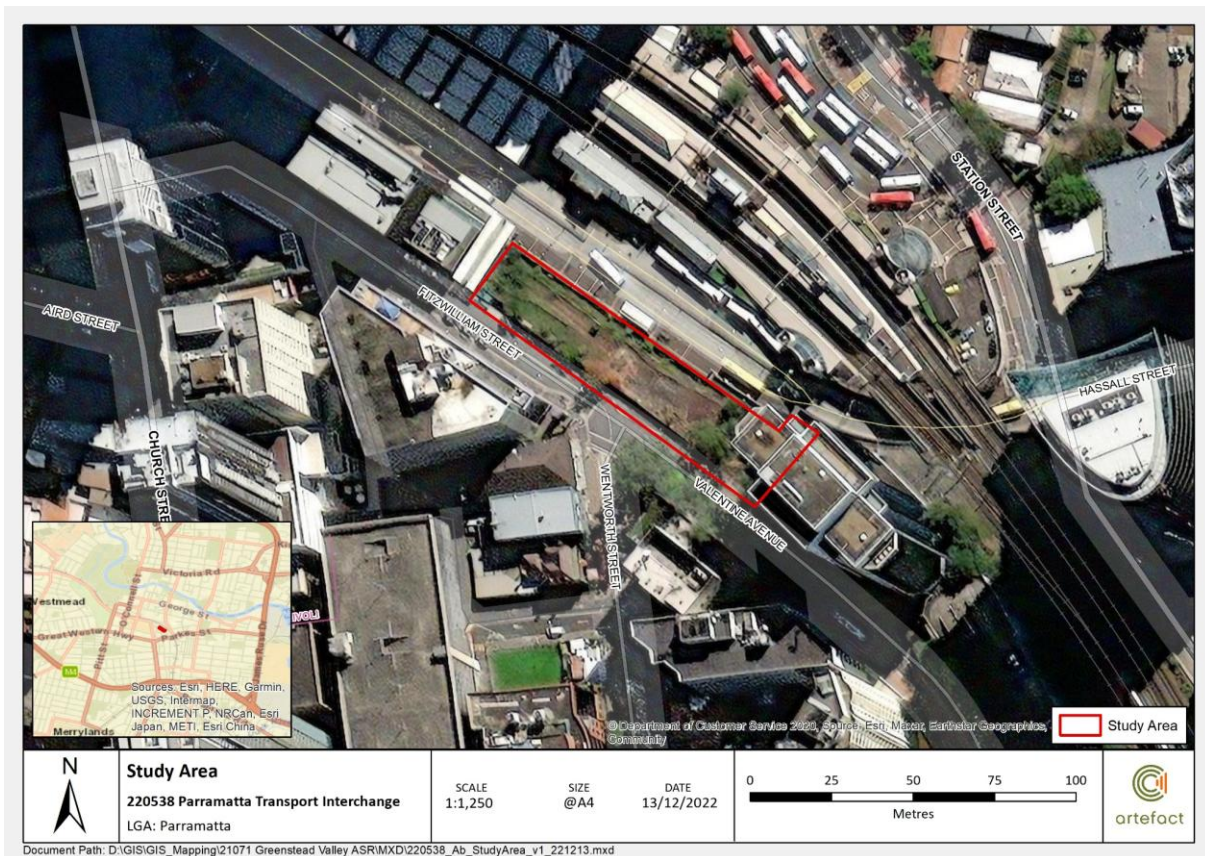


Figure 60. The area assessed by Artefact in 2022, northwest of the current study area (Source: Artefact, 2022, p. 3)

The HAA concluded that the development project would have the potential to cause major adverse impacts to any archaeological resources that had survived where deep subsurface features had not been entirely removed by existing developments on the site.²²

Parramatta Transport Interchange Archaeological Management Plan (Godden Mackay Logan, 2004)

Godden Mackay Logan prepared an Archaeological Management Plan (AMP) in 2004 for the Parramatta Transport Interchange (PTI) project area. It includes an assessment of the archaeological potential within the subject area in the Parramatta City Centre, which was divided into 'core' areas (in the vicinity of Parramatta Railway Station) and 'marginal' areas (associated with the implementation of the PTI project). The current study area is not included in one of these sections, however it is adjacent to 'core' and 'marginal' areas on Valentine Ave and the rail corridor (Figure 61).

²¹ Artefact, 2022, *Fitzwilliam and Argyle Streets, Parramatta Concept Proposal for Build-to-rent residential, commercial office and retail premises Historical Archaeological Assessment*, p. 31

²² Artefact, 2022, p. 41

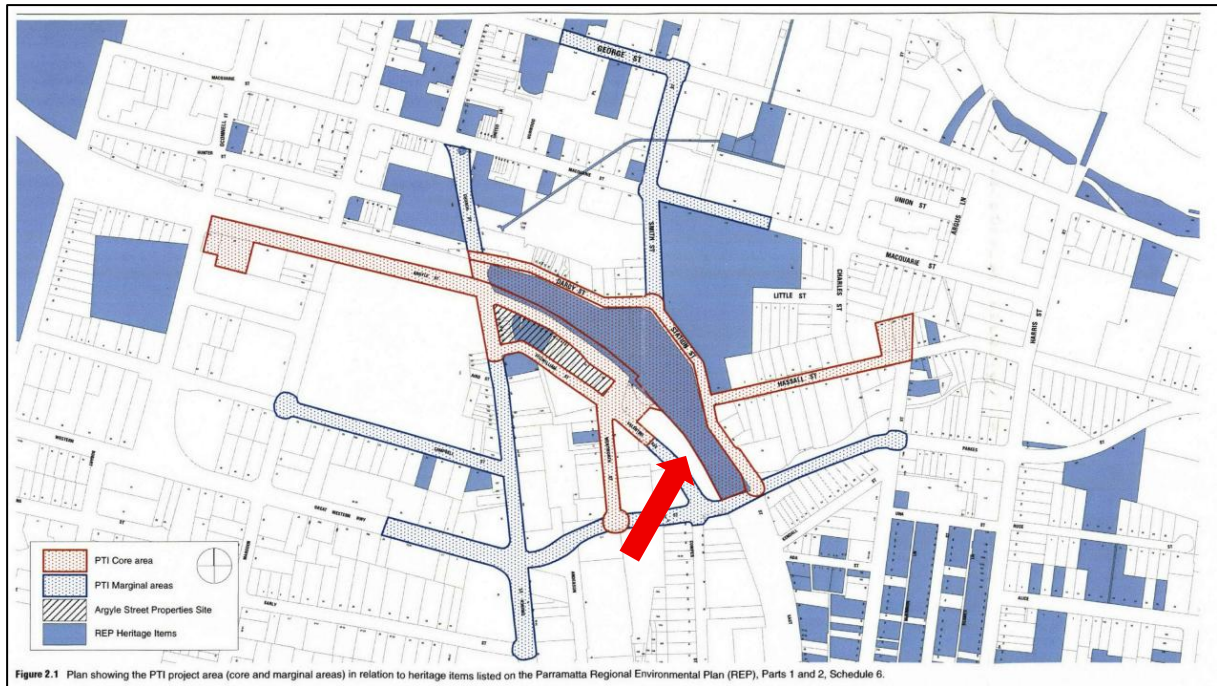


Figure 61. Plan of 'core' and 'marginal' areas in relation to heritage items listed on the former Parramatta Regional Environmental Plan; the study area is indicated with a red arrow (Source: Godden Mackay Logan, 2004, p. 21)

Both 'core' and 'marginal' areas included sites that were assessed as having potential to contain archaeological remains of State significance with moderate-to-exceptional research potential, as well as sites with potential to contain remains of local significance with low-to-moderate research potential. All other locations in the 'core' and 'marginal' areas were assessed as having no archaeological potential or constraints.

Parramatta Historical Archaeological Landscape Management Study (PHALMS) (Godden Mackay Logan, 2003)

The site is partly occupied by Archaeological Management Units (AMU) 3245 and 3055, as identified in Volume 2B of the PHALMS prepared by Godden Mackay Logan. AMU 3055 includes a substantial portion of the city centre south of Parramatta Station (Figure 62), whereas AMU 3245 occupies a portion of land within AMU 3055. Both AMUs are situated on land that was formerly part of the Wentworth Estate. Individual PHALMS entries were prepared from 2000 onward and were published as volumes in 2003.

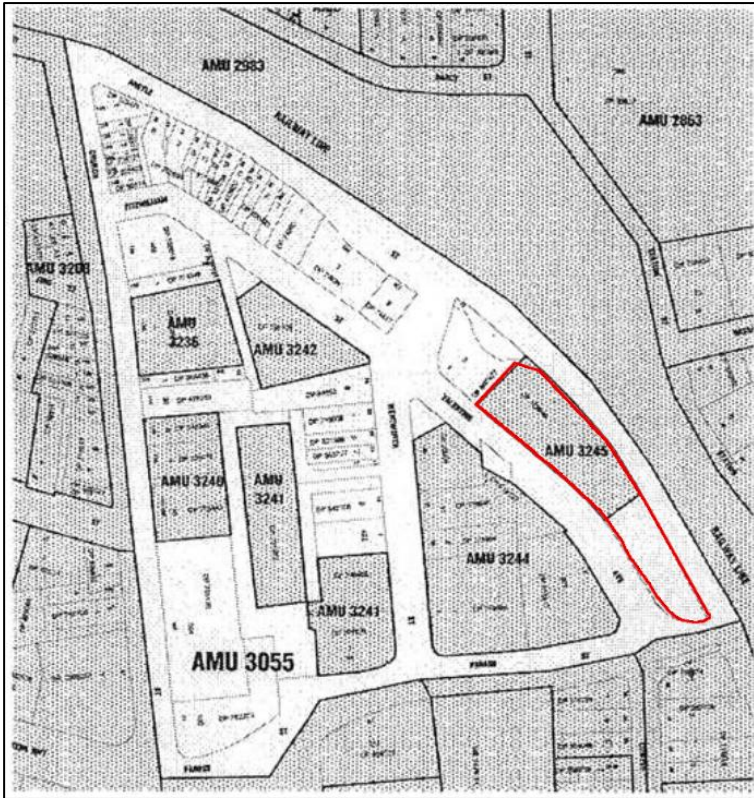


Figure 62. Boundaries of AMU 3055 in the city centre adjacent to Parramatta Station, with the study area outlined in red (Source: Godden Mackay Logan, 2003)

AMU 3055 (at the time of publication of the PHALMS) consisted of a heavily developed area dominated by large office buildings and one- to three-storey commercial and residential buildings, paved roadways, and ground-level car parking areas.²³ The AMU was assessed as containing moderate potential to contain intact archaeological remains including:

*built landforms, structural features, intact subfloor deposits, open deposits and scatters, ecological samples and individual artefacts which have potential to yield information relating to major historic themes including Commerce, Cultural Sites, Housing, Industry, Land Tenure, Townships and Transport*²⁴

These remains would be associated with residential cottages, an early aged care facility, a former slaughter yard, and other residential and commercial developments in the area. The AMU was assessed as having moderate potential to contain largely intact subsurface deposits of these remains, with minor levels of disturbance in some areas. Archaeological remains contained within AMU 3055 were assessed as being of local significance.

AMU 3245 was assessed in the PHALMS as having no archaeological research potential or significance, due to a lack of development within the boundaries of the AMU prior to the construction of the extant multi-storey building (which occupies part of the current study area) in the twentieth century. Subsequent research undertaken by GML and as part of this assessment established that the AMU was not vacant prior to the extant building, as the former Austral Flour Mills had been constructed on land included in the northern part of the AMU between 1894 and 1906. The Mills

²³ Note: this description dates from 2000, but is consistent with the description of the extant city centre area

²⁴ Godden Mackay Logan, 2000. *PHALMS Vol. 2B AMU Inventory*

complex was demolished to make way for the extant development by 1987 (Sections 3.3, 3.5). The construction of the extant multi-storey building would have substantially disturbed archaeological resources associated with the mill.

5.1.3 Assessment of archaeological potential

The historical records indicate that the site was part of the Wentworth Estate, which was subdivided in 1872-73 following the death of William Wentworth. Available evidence indicates that the site remained vacant land until the construction of the Austral Flour Mill between 1895 and 1906. Historical maps of the area show that there were residential terrace houses constructed on Valentine Avenue by 1894, however these were on the opposite side of the avenue and were not included in the footprint of the study area. Based on this, there is **nil** potential for archaeological evidence of the early phases of the site development to be present within the site.

The construction of the Mills complex between 1895 and 1906 would have required substantial earthworks including levelling and excavation for building foundations, silos and loading structures and machinery beds.. The complex would have included the central milling structure, as well as facilities that were added over time (Figure 13, Figure 16) including silos and loading structures (Figure 11, Figure 12). Evidence of deep subsurface structures such as footings could still be present, however the level of survival would be low. The demolition of the mill occurred sometime in 1986-1987 to make way for the construction of the current office tower and associated car park. The redevelopment works would have required substantial earthworks which have likely resulted in the removal of most of the mill elements.

It is likely however that some deeper structural remains associated with the mills such as footings, services, surfaces, and subsurface portions of the silos or other structural and infrastructure elements may still survive in situ. The archaeological potential for the evidence of the Mill complex would be **low-moderate**.

5.2 Archaeological significance

5.2.1 Methodology

Determining the significance of heritage items or a potential archaeological resource is undertaken by utilising a system of assessment centred on the *Burra Charter* (Australia ICOMOS 2013). The principles of the charter are relevant to the assessment, conservation and management of sites and relics. The assessment of heritage significance is outlined through legislation in the Heritage Act and implemented through the *NSW Heritage Manual*, the *Archaeological Assessment Guidelines*²⁵ and the document *Assessing Significance for Historical Archaeological Sites and 'Relics'*.²⁶

If an item meets one of the seven heritage criteria and retains the integrity of its key attributes, it can be considered to have heritage significance (see Table 4). The significance of an item or potential archaeological site can then be assessed as being of local or State significance. If a potential archaeological resource does not reach the local or state significance threshold, then it is not classified as a relic under the Heritage Act.

²⁵ NSW Heritage Office 1996, 25-27.

²⁶ NSW Heritage Branch 2009.

'*State heritage significance*', in relation to a place, building, work, relic, moveable object or precinct, means significance to the State in relation to the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item.

'*Local heritage significance*', in relation to a place, building, work, relic, moveable object or precinct, means significance to an area in relation to the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item.²⁷

Table 3. NSW heritage assessment criteria

Criteria	Description
A – Historical Significance	An item is important in the course or pattern of the local area's cultural or natural history.
B – Associative Significance	An item has strong or special associations with the life or works of a person, or group of persons, of importance in the local area's cultural or natural history.
C – Aesthetic or Technical Significance	An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the local area.
D – Social Significance	An item has strong or special association with a particular community or cultural group in the local area for social, cultural or spiritual reasons.
E – Research Potential	An item has potential to yield information that will contribute to an understanding of the local area's cultural or natural history.
F – Rarity	An item possesses uncommon, rare or endangered aspects of the local area's cultural or natural history.
G - Representativeness	An item is important in demonstrating the principal characteristics of a class of NSW's cultural or natural places of cultural or natural environments (or the cultural or natural history of the local area).

Assessments of archaeological significance are furthered by answering the following questions posed by Bickford and Sullivan

- *Can the site contribute knowledge that no other resource can?*
- *Can the site contribute knowledge that no other site can?*
- *Is this knowledge relevant to general questions about human history or other substantive questions relating to Australian history, or does it contribute to other major research questions?*

²⁷ This section is an extract based on the Heritage Office Assessing Significance for Historical Archaeological Sites and Relics 2009:6.

5.2.2 Existing statements of archaeological significance

The following statements of archaeological significance of the study area are extracted from the entries in the PHALMS for AMU 3055 and AMU 3245.

AMU 3055's statement of significance states

This AMU has moderate archaeological research potential. This area was part of Wentworth's original land grant and was marginal to the early township. There was a slaughter yard in this area in the c1880s. The area was developed as a residential and commercial area throughout the nineteenth and twentieth centuries and redeveloped in the late twentieth century as the commercial centre of Parramatta expanded south. The physical archaeological evidence within this area may include built landforms, structural features, intact subfloor deposits, open deposits and scatters, ecological samples and individual artefacts which have potential to yield information relating to major historic themes including Commerce, Cultural Sites, Housing, Industry, Land Tenure, Townships and Transport. The archaeological resources of this AMU are likely to be largely intact, but subject to minor disturbance in some areas. This AMU is of Local significance.²⁸

AMU 3245's statement of significance states

This AMU has no current archaeological research potential. This area was part of Wentworth's original land grant and was marginal to the early township. There was a Slaughter yard in this area in the c1880s. The area remained largely undeveloped until the late twentieth century as the commercial centre of Parramatta expanded south. The physical archaeological evidence within this area is unlikely to include features which have potential to yield information relating to major historic themes and current research questions. Archaeological evidence at this site is likely to be totally removed. This AMU has no archaeological significance.²⁹

5.2.3 Summary statement of archaeological significance

Analysis of the available historical evidence and extant conditions of the site indicates that there is overall very low potential for historical archaeological remains associated with early to late 19th century activities to be contained within the study area. This is mainly due to the lack of development. Therefore, no legible features capable of having research potential and the ability to provide significant information about the site's past would be expected to survive in the study area.

Potential archaeological features associated with the Austral Flour Mill would mainly comprise subsurface structural remains that are unlikely to provide information that no other mill site of the same period can. Industrial sites of this nature are well documented in written and philographic records. Furthermore, a number of extant mills still exist across the Sydney Metropolitan Area (for example, Homebush Flour Mills, Crago Flour Mill in Newtown, Mungo Scott Flour Mill in Summer Hill, Waratah Mills in Dulwich Hill). Therefore, archaeological remains associated with the Austral Flour Mills are considered to have little or no research potential and as such would not reach the threshold

²⁸ Godden Mackay Logan, 2000

²⁹ Godden Mackay Logan, 2000

of archaeological significance at a local nor state level. . Regarding the associative significance, the Austral Flour Mills provided flour for the Arnott's Biscuits company. With respect to the remaining heritage criteria including historical, technical, aesthetic, representativeness and rarity attributes it is considered that the site's assessed archaeological potential is unable to be unable reach the threshold of significance.

Potential archaeological remains associated with the Austral Flour Mills would not suit the definition of 'relics' under the meaning of the Heritage Act. , Subsurface elements such as building foundations and infrastructure items, should they survive, would be considered to be 'works'.

6.0 SIGNIFICANCE ASSESSMENT

6.1 Methodology

Determining the significance of heritage items or a potential archaeological resource is undertaken by utilising a system of assessment centred on the *Burra Charter* (Australia ICOMOS 2013). The principles of the charter are relevant to the assessment, conservation and management of sites and relics. The assessment of heritage significance is outlined through legislation in the *Heritage Act* and implemented through the *Heritage NSW Assessing Heritage Significance*³⁰, the *Archaeological Assessment Guidelines*³¹ and the document *Assessing Significance for Historical Archaeological Sites and 'Relics'*.³²

If an item meets one of the seven heritage criteria and retains the integrity of its key attributes, it can be considered to have heritage significance (see Table 4). The significance of an item or potential archaeological site can then be assessed as being of local or State significance. If a potential archaeological resource does not reach the local or state significance threshold, then it is not classified as a relic under the *Heritage Act*.

'*State heritage significance*', in relation to a place, building, work, relic, moveable object or precinct, means significance to the State in relation to the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item.

'*Local heritage significance*', in relation to a place, building, work, relic, moveable object or precinct, means significance to an area in relation to the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item.³³

Table 4. NSW heritage assessment criteria

Criteria	Description
A – Historical Significance	An item is important in the course or pattern of the local area's cultural or natural history.
B – Associative Significance	An item has strong or special associations with the life or works of a person, or group of persons, of importance in the local area's cultural or natural history.
C – Aesthetic or Technical Significance	An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the local area.
D – Social Significance	An item has strong or special association with a particular community or cultural group in the local area for social, cultural or spiritual reasons.

³⁰ NSW Department of Climate Change, Energy, the Environment and Water publication *Assessing Heritage Significance*, 2025 accessed via <https://www.environment.nsw.gov.au/publications/assessing-heritage-significance>

³¹ NSW Heritage Office 1996, 25-27.

³² NSW Heritage Branch 2009.

³³ This section is an extract based on the Heritage Office *Assessing Significance for Historical Archaeological Sites and Relics* 2009:6.

Criteria	Description
E – Research Potential	An item has potential to yield information that will contribute to an understanding of the local area's cultural or natural history.
F – Rarity	An item possesses uncommon, rare or endangered aspects of the local area's cultural or natural history.
G - Representativeness	An item is important in demonstrating the principal characteristics of a class of NSW's cultural or natural places of cultural or natural environments (or the cultural or natural history of the local area).

6.2 Existing heritage assessments for heritage items in the vicinity

6.2.1 Australian Convict Sites (Old Government House and Domain)

Old Government House and Domain (Figure 55) is one of 11 sites which comprise the World Heritage Listing for Australian Convict Sites (WHL No. 1306). The site also appears on a number of other heritage lists as described in Chapter 2 of this report.



Figure 63: Old Government House and Domain³⁴

The UNESCO listing sheet for the Australian Convict Sites provides the following statement of significance for its outstanding universal value:

The property consists of eleven complementary sites. It constitutes an outstanding and large-scale example of the forced migration of convicts, who were condemned

³⁴ Australian Convict Sites, Old Government House and Domain, n.d., Photograph, n.d., via <https://www.australianconvictsites.org.au/oldgovernmenthouse>

to transportation to distant colonies of the British Empire; the same method was also used by other colonial states.

The sites illustrate the different types of convict settlement organized to serve the colonial development project by means of buildings, ports, infrastructure, the extraction of resources, etc. They illustrate the living conditions of the convicts, who were condemned to transportation far from their homes, deprived of freedom, and subjected to forced labour.

This transportation and associated forced labour was implemented on a large scale, both for criminals and for people convicted for relatively minor offences, as well as for expressing certain opinions or being political opponents. The penalty of transportation to Australia also applied to women and children from the age of nine. The convict stations are testimony to a legal form of punishment that dominated in the 18th and 19th centuries in the large European colonial states, at the same time as and after the abolition of slavery.

The property shows the various forms that the convict settlements took, closely reflecting the discussions and beliefs about the punishment of crime in 18th and 19th century Europe, both in terms of its exemplarity and the harshness of the punishment used as a deterrent, and of the aim of social rehabilitation through labour and discipline. They influenced the emergence of a penal model in Europe and America.

Within the colonial system established in Australia, the convict settlements simultaneously led to the Aboriginal population being forced back into the less fertile hinterland, and to the creation of a significant source of population of European origin.³⁵

Old Government House and Domain is located at Pitt St &, Macquarie St, Parramatta. The subject site is located approximately 900m from the WHL listing boundary at George Street Gatehouse in Parramatta Park, and 800m from the WHL buffer zone at the corner of Macquarie and O'Connell Streets. The subject site itself is not located within the Parramatta Park World Heritage Buffer Zone.

The UNESCO listing sheet for the Australian Convict Sites provides the following assessment of outstanding universal values, see Table 5.

Table 5. Outstanding Universal Values for Australian Convict Sites

Criteria	Discussion
(iv) to be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history;	<i>The Australian convict sites constitute an outstanding example of the way in which conventional forced labour and national prison systems were transformed, in major European nations in the 18th and 19th centuries, into a system of deportation and forced labour forming part of the British Empire's vast colonial project. They illustrate the variety of the creation of penal colonies to serve the many material needs created by the development of a new territory. They bear witness to a penitentiary system which had many objectives, ranging from severe punishment used as a deterrent to forced labour for men, women and children, and the rehabilitation of the convicts through labour and discipline.</i>

³⁵ UNESCO, "Australian Convict Sites."

(vi) to be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance. (The Committee considers that this criterion should preferably be used in conjunction with other criteria);

The transportation of criminals, delinquents, and political prisoners to colonial lands by the great nation states between the 18th and 20th centuries is an important aspect of human history, especially with regard to its penal, political and colonial dimensions. The Australian convict settlements provide a particularly complete example of this history and the associated symbolic values derived from discussions in modern and contemporary European society. They illustrate an active phase in the occupation of colonial lands to the detriment of the Aboriginal peoples, and the process of creating a colonial population of European origin through the dialectic of punishment and transportation followed by forced labour and social rehabilitation to the eventual social integration of convicts as settlers.

Significant Views and Vistas

The SHR listing sheet for Parramatta Park and Old Government House provides the following statement identifying significant views and vistas:

The location of Old Government House was chosen for the expansive views commanded. A landmark site, the Park and House retain historical association with successive governors, and was the location for significant interaction between Aboriginal and European people. It demonstrates early town planning and landscaping design and features strategic and picturesque views and vistas, created to frame Old Government House and enforce the status of the Governor over the convicts and free settlers inhabiting the township below. As such it is a conscious recreation of English landscapes of control. ⁵⁷

As shown in Figure 56, the subject site is outside of the identified significant views from Old Government House and Domain.



Figure 64: Significant views from Old Government House³⁶

³⁶ Image prepared by Artefact Heritage in 2025 using data from "development in Parramatta and the Impact on Old Government House and Domain's World and National Heritage Listed Values" by Planisphere, 2012, p.44

6.2.2 Lancer Barracks Precinct

The Lancer Barracks Precinct (Figure 57) is listed on the Commonwealth Heritage list (Place ID 105512).



Figure 65: Lancer Barracks Precinct³⁷

The following statement of heritage significance has been extracted from the Australian Heritage Database listing for the item.

The complex as a whole is historically significant. The two surviving original buildings, known as Bob's Hall and the Barracks, are very important historically as they date from 1819 and are directly associated with the early military history of New South Wales, and with the early government administration of Parramatta. They are the oldest surviving military barracks on the Australian mainland. The buildings were used by British troops until the 1850s, then by police forces, and from 1897 along with the other buildings added to the complex, they have been the home of the Royal New South Wales Lancers. The Victorian and Edwardian era buildings show the development of this military establishment during the nineteenth and early twentieth centuries. Excepting the police period, the complex has a very lengthy association with Australian military history. (Criterion A.4)

The early buildings are important in being among the few buildings surviving from the period of NSW Governor Lachlan Macquarie. Further, Bob's Hall, with its colonnaded verandah on three sides covered by the main building's roof, is a rare early verandahed form. (Criterion B.2)

With their symmetrical form, hipped roofs, textures, openings and general proportions, the early buildings reflect well characteristics of Old Colonial Georgian architecture. The late nineteenth/early twentieth century buildings, through their materials, roof shapes, gable treatments, decorative timberwork, openings and other features are good examples of Federation style. Also, despite changes to the complex as a whole, the buildings convey the character of a military establishment developed over a lengthy period, and are important as examples of military buildings created during their respective periods. (Criterion D.2)

The architect of the early buildings, Lieutenant John Watts, played a notable role in the Macquarie period, designing a number of buildings and making a contribution to the colony's architectural development. (Criterion H.1)

³⁷ image from Parramatta History and Heritage website accessed 20 October 2025 via <https://historyandheritage.cityofparramatta.nsw.gov.au/research-topics/lancers/lancer-barracks-and-lancers>

The complex is of social significance to the military community (Lancers personnel especially) and to the broader community which has been visiting the place for some years. (Criterion G.1)

The buildings, including Linden House which is sympathetic in scale and character to the others, are visually linked by their arrangement and help to define the parade ground around which they are situated and whose open space is in contrast to the built forms. The whole creates a cohesive identity with aesthetic importance, which is strengthened by the height, scale and form of the buildings. (Criterion E.1)³⁸

The Lancer Barracks Precinct has heritage significance at the commonwealth level for its historic processes, rarity, characteristic values, aesthetic characteristics, social value and significant people.

6.2.3 Parramatta Railway Station

Parramatta Railway Station (Figure 58) is listed on the SHR (00696), Parramatta LEP 2023 (I 514), Transport for NSW Section 170 register (4801031) and National Trust (NSW) heritage register (9428). The item is located immediately opposite the proposed development.



Figure 66: View of the historic platforms at Parramatta Station³⁹

The following statement of heritage significance has been extracted from the SHI listing for the item.

³⁸ Australian Heritage Database, accessed 20 October 2025. (https://www.environment.gov.au/cgi-bin/ahdb/search.pl?mode=place_detail;search=state%3DNSW%3Blist_code%3DCHL%3Blegal_status%3D35%3Bkeyword_PD%3D0%3Bkeyword_SS%3D0%3Bkeyword_PH%3D0;place_id=105512)

³⁹ Heritage NSW accessed 20 October 2025 via <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=4801031>

Parramatta Railway Station is of state heritage significance as an early surviving passenger railway station in New South Wales, which has been in use since 1859, and together with its extant complex of individually significant railway buildings and infrastructure, some of which are rare or unique examples of their type, it is evidence of the development and history of the New South Wales railway network to the present.

The original 1859 station building is associated with John Whitton, the NSW Railway's Engineer-in-Chief from 1857 to 1890 who was responsible for the planning, approval and construction of all railway infrastructure, including passenger buildings. This building is the earliest example of Whitton's work.

The station's design and planning as a whole including island station buildings, the signal box, side platforms, enclosed subway access and associated railway mechanism, reflecting the curve of the line and the narrowness of the rail corridor, exemplify the technical and architectural achievements of the New South Wales railways, and demonstrate the evolution of the site in response to the growth of the Parramatta township.

Despite recent changes to the site, Parramatta Station Group remains as an important element of the civic precinct in the township of Parramatta. The site contains built and archaeological elements, which relate to the many phases of the site's history since the establishment of the station.⁴⁰

Parramatta Railway Station has heritage significance at the state level for its historic, associative, aesthetic, rarity, research and representative values.

6.2.4 Experiment Farm Cottage

Experiment Farm Cottage site (Figure 59) is listed on the State Heritage Register (SHR no 000768).

⁴⁰ Heritage NSW. "Parramatta Railway Station Group." Accessed on 15 October 2025 via <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=4801031>



Figure 67: Experiment Farm Cottage⁴¹

The following statement of heritage significance has been extracted from the SHI listing for the item.

Experiment Farm Cottage and the site of Experiment Farm is of exceptional cultural significance to Australia, NSW and Parramatta because:

- *it forms part of the first European land grant in Australia;*
- *it is associated with the early agricultural pursuits, including Governor Phillip's "experiment" to determine the period required in which a settler could become self-supporting. The initial success of Experiment Farm encouraged Phillip to open the Parramatta area to free settlement;*
- *the location demonstrates the importance of the Parramatta area in the agricultural development and early survival of the European colony;*
- *Following its purchase by Surgeon John Harris, it became part of "Harris' Farm", one of several large properties established by the "Parramatta Gentry" from the late 18th- mid 19th century, including those owned by the Macarthurs, Marsdens, Kings, Wentworths and Blaxlands. The current Experiment Farm Cottage formed part of "Harris' Farm";*
- *It contains evidence of the various phases of the site from the late 18th century to the present, including:*
 - *the topographical features associated with Ruse's Experiment Farm;*

⁴¹ Elizabeth Farm', Museums and Galleries NSW, accessed 15 October 2025 via <https://mgnsnsw.org.au/organisations/experiment-farm-cottage/>

- the establishment of Harris' Farm and the construction of Experiment Farm Cottage;
- patterns of subdivision and the emergence of the present suburban setting;
- Experiment Farm Cottage is a finely detailed colonial bungalow dating to c.1834. Its sophisticated design is demonstrated through the architectural treatment of the front façade, including French doors, delicate columns and main entrance, and the internal treatment of room configuration and its methods of integrating the verandah into the main area of the house;
- of its visual prominence in the surrounding landscape. The position of Experiment Farm Cottage demonstrates important relationships with the landscape. Situated on a once prominent rise, the current house addresses the north towards Parramatta River and Clay Cliff Creek;
- of its surviving fabric (both extant and archaeological), and the vast body of records documenting its historical development. In particular, resources from the 19th century provide information on the development and layout of Harris' Farm, including Experiment Farm Cottage and associated farm features such as former fence lines, carriage drive, farm roads, plantings, stables, outbuildings and pattern of subdivision;
- of its documented association with individuals who have helped shape its form and use, including Governor Phillip, James Ruse, Surgeon John Harris and his descendants, Pieter Laurentz Campbell and the Fraser family;
- it is a place highly valued by the community. Efforts by the community since the 1920s have assisted in its conservation, culminating in the acquisition of the property by the NSW National Trust in 1961. Local residents have expressed great interest in the ongoing conservation of the property and recognise its heritage significance as contributing towards the identity of Harris Park.

*Experiment Farm cottage has a strong association with the earliest free settlement of land in Australia and with the first grant to a freed convict, James Ruse. It also has a strong association with John Harris. The house is a rare example of an early farmhouse in very intact condition. Site possesses archaeological potential to contribute to an understanding of early development in Parramatta.*⁴²

Experiment Farm Cottage has heritage significance at the state level for its historic, aesthetic, social, research, rarity and representative values.

6.2.5 Elizabeth Farm

Elizabeth Farm site (Figure 60) is listed on the State Heritage Register (SHR no 00001).

⁴² Heritage NSW, "Experiment Farm Cottage" accessed 20 October 2025 via <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=5051403>



Figure 68: Elizabeth Farm⁴³

The following statement of heritage significance has been extracted from the SHI listing for the item.

*Elizabeth Farm is associated with major figures who were prominent in the 19th century development of the colony, including John and Elizabeth Macarthur, and the Swann family in the 20th century. There is a large surviving collection of documentary evidence connected to the house, which contains part of the oldest surviving European construction in Australia. The garden contains some of the earliest European plantings in Australia including a Chinese elm (*Ulmus parvifolia*), 1805-planted olive (*Olea europaea*), kurrajong (*Brachychiton populneus*), Bunya pine (*Araucaria bidwillii*) and hoop pine (*A.cunninghamii*). It is an example of early colonial architecture and early agricultural experiments (Bravery 1997:13-14, 24, modified Read, S., 11/2006).*

The property forms the core of a major historic farm estate which was highly influential in the development of the wool industry in Australia, the introduction and acclimatisation of plants and economic crops such as olives and vines. By its size, location and history of subdivision the property was influential on the development of the town of Parramatta.

The property is also significant in the history of conservation in NSW, being the first to be preserved by direct acquisition by the State Government, and the second

⁴³ Museums and Galleries of NSW accessed 21 October 2025 via <https://mgnsnsw.org.au/organisations/elizabeth-farm/>

property to have a permanent conservation order placed over it under the Heritage Act 1977.⁴⁴

Elizabeth Farm has heritage significance at the state level for its historic, aesthetic, social, research, and rarity values.

6.2.6 Hambledon Cottage, Grounds and Archaeology

The Hambledon Cottage, Grounds and Archaeology site (Figure 61) is listed on the State Heritage Register (SHR no 01888).



Figure 69: Hambledon Cottage⁴⁵

The following statement of heritage significance has been extracted from the SHI listing for the item:

Hambledon Cottage, its grounds and associated archaeology have State significance for their important and direct associations with the Macarthurs, one of the most influential families in Australian history as well as other figures of state and local renown.

The house is a fine and rare example of an 1820s domestic building and is expressive of the taste, aspirations and needs of its several owners. Its landscape includes plantings dating from its earliest construction and are now some of

⁴⁴ Heritage NSW, "Elizabeth Farm" accessed 20 October 2025 via <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=5051394>

⁴⁵ Museums and Galleries of NSW, accessed 21 October 2025 via <https://mqnsw.org.au/organisations/hambledon-cottage-museum/>

Australia's oldest surviving European tree plantings. The Hambledon Cottage site is an important component of an estate (Elizabeth Farm) that became a prototype of Australian land management. It also has strong associations with a number of individuals and families important in the development of Parramatta, New South Wales and Australia, including Thomas Hobbes Scott and Henry Kitchen. The archaeology at Hambledon Cottage and grounds has a high archaeological research potential and is likely to be highly intact and of state significance.

Hambledon Cottage also has significance for its role in illustrating the development of the status of Parramatta, and holds great value for contemporary society for these reasons. The archaeological resource will be able to contribute to more accurately documenting the development, use and life style associated with the cottage, Parramatta and early colonial society.⁴⁶

Hambledon Cottage, Grounds and Archaeology has heritage significance at the state level for its historic, associative, aesthetic, social, research, rarity and representative values.

6.2.7 Ancient Aboriginal and Early Colonial Landscape

The Ancient Aboriginal and Early Colonial Landscape site is listed on the State Heritage Register (SHR no. 01863). The following statement of heritage significance has been extracted from the SHI listing for the item.

The Parramatta Sand Body is an important cultural landscape. Archaeological investigation of the sand body has uncovered a substantial archaeological record that has contributed to our understanding of pre-colonial Aboriginal occupation of the Parramatta area and more broadly, the Cumberland Plain. The antiquity of some of this archaeological record and evidence of change over time is significant to Australian archaeology generally. For the local Aboriginal people whose ancestors lived on and used the sand body for many thousands of years before the arrival of non-Aboriginal people, the sand body has special significance. The sand body is a tangible link with their cultural past.

The Parramatta Sand Body Conservation Area has the potential to provide further insight into the diet and lifestyle of Aboriginal people in pre-colonial times. Prior to non-indigenous settlement of the area, the site would have been an attractive location for Aboriginal people, as it had ready access to, two permanent water sources and mixed resources. Archaeological investigations of parts of the sand body in close vicinity to the conservation area, have revealed evidence of pre-colonial Aboriginal occupation.

From a geomorphic perspective, the sand body has the potential to provide insight into patterns of river flow and flood events that could lead to a better understanding of the formation of the Parramatta River Valley. On a broader scale, the sand body may be able to provide valuable information about changing sea levels in the Pleistocene period with implications for possible future sea levels and coastal geography under a warming climate.

⁴⁶ Heritage NSW, "Hambledon Cottage, Grounds and Archaeology", accessed 20 October 2025 via <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=5052762>

In addition to the archaeological and geomorphic research value of the sand body, the Parramatta Sand Body also has the potential to provide valuable insight into the natural environment of Parramatta CBD in pre-colonial times. The fluvial sand terrace is evidence that Parramatta had a more diverse natural environment than might otherwise have been known from historical accounts, which provide few details about the natural vegetation of area. Pollen, which may be preserved within the sand body, could yield valuable information about the original vegetation of the Parramatta CBD area.

Site of Military Barracks and Soldiers Garden

The site of Military Barracks and Soldiers Garden is of state significance for its association with the establishment of the town of Parramatta and for its association with the works of Governor Arthur Phillip. Governor Phillip established a settlement at Parramatta in 1788 and by 1790 he commenced building works to establish vital infrastructure for a town. Amongst the early building works he undertook, was the construction of military barracks for the town garrison. The barracks are also of significant for their association with the New South Wales Corps. The NSW Corps arrived as guards on the Second Fleet in June 1790 to relieve the marines who had accompanied the First Fleet. Members of the NSW Corps served as the garrison at Parramatta and were housed in the newly erected military barracks.

The site of the Military Barracks and Soldiers Garden is a rare archaeological site. It was one of two military barracks built during the period of Captain Arthur Phillip's term as Governor of NSW. The site, which was occupied by the NSW Corps in May 1791, has the potential to provide the earliest surviving physical evidence of a convict period military barracks in Australia. Relics and deposits of the Military Barracks and Soldiers Garden may yield knowledge, which may not be available from other sources, about the nature of the institutionalised life of soldiers in the early colony. In addition, archaeological remains associated with the barracks may contribute to our knowledge of the nature and availability of building resources in NSW in the late 18th and early 19th Century.⁴⁷

Ancient Aboriginal and Early Colonial Landscape has heritage significance at the state level for its historic, associative, social, research, rarity and representative values.

6.2.8 St John's Anglican Cathedral

St John's Anglican Cathedral (Figure 62) is a State listed heritage item, identified as SHR No. 01805, it is also locally listed under the Parramatta LEP 2023 as St John's Anglican Cathedral LEP No. I465, on the RNE as St Johns Anglican Provisional Cathedral RNE No. 3041, and on the NSW NTHR as St John's Provisional Cathedral. It is located at 195 Church St, Parramatta NSW 2150.

⁴⁷ Heritage NSW, "Ancient Aboriginal and Early Colonial Landscape" accessed 20 October 2025 via <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=5061073>



Figure 70: St John's Anglican Cathedral, Parramatta⁴⁸

The following statement of heritage significance has been extracted from the SHI listing for the item.

St John's Cathedral is of state significance as the oldest church site and continuous place of Christian worship in Australia, dating from 1803; as one of the two oldest parishes proclaimed in Australia in 1802; for potential archaeology of the 1803 parish church of St John's that was the first parish church built in Australia, and for the historical significance and rarity of the two towers built in 1817-19 by Governor Macquarie and his wife Elizabeth that are the only surviving fabric of the first church of St John's, the oldest remaining part of any Anglican church in Australia and a rare surviving legacy of Governor Lachlan and Elizabeth Macquarie to the built environment of NSW.

Governor King's 1802 proclamation of the first two parishes of the colony of NSW -- St John's Parramatta and St Phillip's Sydney -- demonstrated the colony's early spiritual development and the formal recognition of the Church of England as the recognised denomination of the colony. The present St Johns' parish church (now Cathedral) is built on the site of the first (1803) parish church, whereas the present St Phillip's Church, York Street, Sydney has moved from the site of the first (1809) St Phillip's parish church that was built at nearby Lang Park.⁴⁹

⁴⁸ Australian Christian Church Histories, accessed 21 October 2025 via <https://www.churchhistories.net.au/church-catalog/parramatta-nsw-st-johns-anglican>

⁴⁹ "St John's Anglican Cathedral" (Heritage NSW, n.d.), State Heritage Inventory, <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=506099>

St John's Anglican Cathedral has heritage significance at the state level for its historic, associative, aesthetic and social values.

6.2.9 Lennox House

Lennox House (Figure 63) is listed on the State Heritage Register (SHR no 00751).



Figure 71: Lennox House (Source: Google Streetview, 2023)

The following statement of heritage significance has been extracted from the SHI listing for the item.

Association with notable events or people - House associated with notable people - built for and occupied by David Lennox, engineer.⁵⁰

Lennox House has heritage significance at the state level for its historic, aesthetic and representative values.

6.2.10 Shop and Office

The item known as Shop and Office is listed on the State Heritage Register (SHR no 00278). The following statement of heritage significance has been extracted from the SHI listing for the item.

⁵⁰ Heritage NSW, "Lennox House", accessed 20 October 2025 via <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=5051415>.

An example of stone buildings that characterised the townscape of nineteenth century Parramatta, and are now rare. Site possesses potential to contribute to an understanding early urban development in Parramatta.⁵¹

Shop and Office has heritage significance at the state level for its historic values.

6.2.11 1st/15th Royal NSW Lancers Memorial Museum Collection

The 1st/15th Royal NSW Lancers Memorial Museum Collection (Figure 64) is listed on the State Heritage Register (SHR No 01824).



Figure 72: 1st/15th Royal NSW Lancers Memorial Museum Collection⁵²

The following statement of heritage significance has been extracted from the SHI listing for the item.

The 1st/15th Royal NSW Lancers Memorial Museum Collection is of State heritage significance because it documents the complete and continuous history of Australia's oldest and most highly decorated regiment from its inception through to the present day. The collection interprets major themes in Australia's history, including the role played by Australian troops in the Boer War and the First and Second World Wars.

The collection is also significant because of its relationship to the historic Parramatta Barracks. The Barracks are the oldest surviving mainland military barracks in Australia. The collection is important in the interpretation of the Barracks and it enhances the significance of the place.

The Royal NSW Lancers Memorial Museum Collection has over 50 items identified as being of National significance and some of International significance. It includes significant items relating to: The formation and development of a colonial military unit; The role played by the Regiment in Sydney society; The evolution of the Regiment and its weaponry, equipment and uniforms from horse mounted lancers to modern, heavy-armoured vehicles; The participation of the Regiment in important state, national and international occasions and major conflicts, such as

⁵¹ Heritage NSW, "Shop and Office", accessed 20 October 2025 via <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=5051409>.

⁵² Parramatta History and Heritage Website, accessed 20 October 2025 via <https://historyandheritage.cityofparramatta.nsw.gov.au/research-topics/world-war-two/1st15th-royal-new-south-wales-lancers-memorial-museum>

WW1 and WW2; and The relationship between prominent and influential members of NSW society and the development of the Regiment.

The collection also contains the first versions of five poems written by Banjo Paterson during the period he was a war correspondent in South Africa. The poems all show differences, some very extensive, from later published versions. The poems are important for their ability to demonstrate the creative writing process of this renowned Australian Poet.

The collection is significant because it has the potential to provide information, not available from other sources on a range of topics including: the role played by Australian forces in major military conflicts; the evolution of the Australian cavalry; important state, national and international events; the lives and military careers of influential prominent figures in NSW society and the literary work of renowned Australian poet Banjo Paterson.

The collection contains relics, artefacts and documents that bear testimony to the contribution of individual members of the Regiment to major Australian conflicts. The significance of the collection to past and present members of the Regiment is evidenced by the involvement of serving and retired members of the Regiment in the management and running of the Museum: the board of management for the Museum comprises both serving and retired members; and the Museum is staffed by retired Lancers.

The Royal NSW Lancers Memorial Museum Collection is unique as there is no other collection covering the entire 125 year history of Australia's oldest surviving regiment. There are also no other Light Horse or cavalry museums in Australia with as comprehensive collection as the Royal NSW Lancers either in terms of the size and extent of the collection or the periods covered.⁵³

1st/15th Royal NSW Lancers Memorial Museum Collection has heritage significance at the state level for its historic, associative, aesthetic, social, research and rare values.

6.2.12 Warders Cottage

Warders Cottage is listed on the State Heritage Register (SHR No 00709). There is no statement of significance available, but the Cottages were built between 1842 and 1844. It is believed that they were constructed as a working-class housing venture by merchant John Solomon.

6.2.13 Perth House and Stables

Perth House and Stables (Figure 65) is listed on the State Heritage Register (SHR No 00155).

⁵³ Heritage NSW 1st/15th Royal NSW Lancers Memorial Museum Collection" Accessed on 20 October 2025 via <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=5061065>.



Figure 73: Image showing Perth House used as a school in 1889 and a contemporary image of the building⁵⁴

The following statement of heritage significance has been extracted from the SHI listing for the item.

Perth House and Stables is of State significance as it demonstrates c.1850 aspirations with regard to taste and lifestyle on a domestic level. It demonstrates a high degree of creative excellence and is a fine example of medium sized domestic architecture. It has strong associations with important figures such as George Oakes and James Houison.⁵⁵

Perth House and Stables has heritage significance at the state level for its historic, associative, aesthetic, rarity and representative values.

6.2.14 Roxy Theatre

The Roxy Theatre (Figure 66) is listed on the State Heritage Register (SHR no 00711)

⁵⁴ <https://historyandheritage.cityofparramatta.nsw.gov.au/blog/2017/07/17/perth-house-and-stables>

⁵⁵ Heritage NSW, "Perth House and Stables". Accessed on 20 October 2025 via <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=5051401>

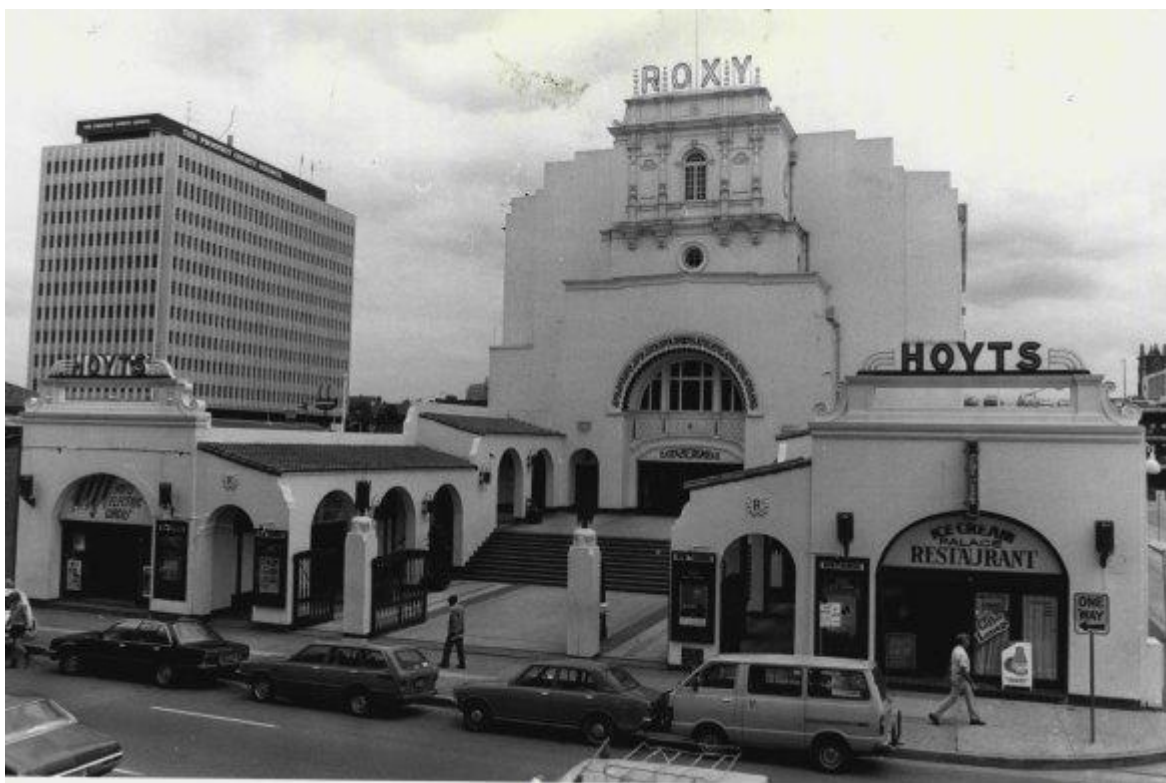


Figure 74: Image of the Roxy Theatre, date unknown⁵⁶

The following statement of heritage significance has been extracted from the SHI listing for the item.

T The Roxy Theatre has high cultural significance as a good and relatively intact representative example of the 'Picture Palaces' of the interwar period, its overall form and surviving original fitout and fabric displaying the major attributes of this building type. More particularly it is an excellent example of 'Interwar Spanish Mission' style, displaying features typical of this style but also with a notable individuality and quality of architectural design.

The theatre also provides evidence of the changing nature of film theatres and theatre going since the 1920s. Its architectural character and function have been influenced by both national and international developments in film technology and theatre visitation since the advent of the 'Talkies' - ranging from large single auditorium regularly seating nearly 2000 to the present multi-theatre configuration. The size and architectural character of the building also reflect American cultural influences in the interwar period and the profitability of 'Picture Palaces'.

The location and origins of the theatre are closely associated with the growth of Sydney's suburbs in the interwar years and Parramatta in particular. It is an attractive and distinctive local landmark and particularly valued by the regular theatre-goers of its early years and those interested in movie and architectural history (its retention in the 1970s being in large measure due to intervention by such groups). (Somerville 1997)

⁵⁶ The Sydney Morning Herald, accessed 15 October 2025 via <https://www.smh.com.au/culture/art-and-design/labor-raises-stakes-on-roxy-and-nsw-heritage-cinemas-20230219-p5clpn.html>

*Professional, trade and manufacturing practice - example of the work of notable architect. Evidence of social and cultural life.*⁵⁷

The Roxy Theatre has heritage significance at the local level for its historic, aesthetic, social and rarity values.

⁵⁷ Heritage NSW, Access on 15 October 2025 via <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=5051406>

7.0 THE PROPOSED WORKS

7.1 The proposed works

The proposed works are described in the following drawings and documents:

- Architectural drawing set by Buchan Furtado Sullivan dated 30 October 2025
- Request for industry specific SEARS prepared by Urbis, dated 20 May 2024

7.1.1 The proposal

The application seeks development consent for the redevelopment of the site for a mixed-use development comprising residential accommodation (shop top housing and co-living housing) and retail uses.

Specifically, this application seeks approval for the following:

- Demolition of the existing multi-deck car park.
- Demolition of existing internal fit-out within the commercial building.
- Site preparation works including:
 - Removal of trees as outlined in the Arborist Report.
 - Excavation on the southern portion of the site to a maximum depth of six basement levels.
- Construction of a 72-storey shop-top housing building, which will accommodate:
 - Six levels of basement with 144 car parking spaces, bicycle parking, services, waste storage.
 - Lobby, retail premises and loading dock at ground level.
 - 479 residential apartments on Levels 1-70.
 - Communal open space and resident amenities on level 5 and level 71.
 - Rooftop plant on level 72.
 - Vehicular access provided via Valentine Avenue.
 - Dedication of 3% of dwellings as affordable housing.
- Change of use of from commercial premises to co-living housing and ancillary retail.
- Alterations and additions to the existing commercial premises to accommodate co-living housing including:
 - Upgrade to existing internal lift access.
 - Alterations to the basement with amenity, laundry, jam space, manager's office and 17 co-living housing spaces.
 - Ground level retail premises and communal internal facilities including a gym, yoga room and wellness lounge.
 - Upper levels: Co-living housing providing 608 beds across 440 units in private rooms, and 2-, 3- and 4-room configurations, communal internal facilities on each level and communal open spaces on level 7 and level 14.

- Alterations to the building façade.
- Hard and soft landscaping and public domain works along Valentine Avenue and Parkes Street.
- Building identification signage on the shop-top housing building and co-living housing building.
- Stratum subdivision into two lots.

Extension and augmentation of physical infrastructure and utilities as required.

8.0 HERITAGE IMPACT ASSESSMENT

8.1 Overview

This section assesses the heritage impact of the proposed works at the study area on heritage values within the study area. Justifications are also provided for the proposed works.

Within this approach, the objective of a heritage impact assessment is to evaluate and explain how the proposed works will affect the heritage value of the study area and/or place. A heritage impact assessment should also address how the heritage value of the site/place can be conserved or maintained, or preferably enhanced by the proposed works.

In order to consistently identify the impact of the proposed works, the terminology contained in the following table has been references throughout this document. The terminology and definitions are based on those contained in guidelines produced by Heritage NSW⁵⁸ and are shown in Table 5.

Table 5: Terminology for assessing the magnitude of heritage impact.

Grading	Definition
Total loss of significance	Major adverse impacts to the extent where the place would no longer meet the criteria for heritage listing.
Adverse impact	Major (that is, more than minor or moderate) adverse impacts to heritage significance, defined as removing significant features, obscuring key views, or removing evidence of significant historical associations, which require substantial changes to the scope of works or design to sufficiently reduce those impacts. The material threshold applies when substantial changes to the application are required to reduce the adverse impacts to a moderate or minor level. Moderate adverse impacts to heritage significance. Actions in this category would include removal of an important part of a heritage item's setting or temporary removal of significant elements or fabric. The impact of these actions could be reduced through appropriate mitigation measures. Minor adverse impacts to heritage significance, defined as impacts to State heritage significance that are minor enough that they are outweighed by other benefits of the application, for example sympathetic alterations to an original non-compliant balustrade to enable continued public use.
Little to no impact*	An alteration to heritage significance that is so minor that it is considered negligible. * Little to no impact (as opposed to no impact) acknowledges that any change will result in some level of impact/alteration to heritage significance.
Positive impact	Alterations that enhance the ability to demonstrate the heritage significance of a listed place.

⁵⁸ Heritage NSW, *Material Threshold Policy*, 2020

Table 6: Terminology for heritage impact types

Impact	Definition
Physical	Impacts resulting from works located within or outside the curtilage boundaries of the heritage item, caused by removing or altering the item or fabric of heritage significance
Visual	Impact to views, vistas and setting of the heritage item resulting from proposed works within or outside the curtilage boundaries of the heritage item.
Potential	Impacts resulting from increased noise, vibrations and construction works located within or outside the curtilage boundaries of the heritage item.
Archaeological	Impacts to potential archaeological remains located within the curtilage boundaries of the heritage item.

8.2 Potential heritage impacts to items in the vicinity

8.2.1 Old Government House and Domain

Old Government House and Domain, which is one of 11 sites that comprise the World Heritage Listing for Australian Convict Sites (WHL no. 1306), is located approximately 1km from the proposed development at 10 Valentine Avenue, Parramatta.

Old Government House and Domain have significance as an outstanding example of the way European prison systems transformed during the 18th and 19th centuries into a system of deportation and forced labour which formed part of the British Empires vast colonial project. The buildings, structures and grounds of Old Government House and Domain continue to provide tangible evidence of this period of punishment and forced labour of men, women and children followed by social rehabilitation and integration of convicts into the community as settlers. Given the subject site is located approximately 1km from Old Government House, and is outside the world heritage list buffer zone (Figure 2), the proposed development will have no impact on this identified heritage significance.

Old Government House and Domain were situated so that it had expansive views across Parramatta and to enforce the status of the Governor over the convicts and free settlers. For these reasons views and vistas to and from Old Government House are of heritage significance. Figure 57 shows the visual buffer zone for views of high significance. The subject site is outside of this zone and the site inspection suggests that there is some screening of views from Old Government House to the city by trees.

The proposed development at 10 Valentine Avenue has been assessed as having **little to no adverse physical or visual impact** on the heritage significance of Old Government House and Domain.

8.2.2 Lancer Barracks Precinct

The Lancer Barracks Precinct is listed on the Commonwealth Heritage List and is located approximately 200m from the subject site on the northern side of the railway line. The Lancer Barracks Precinct is of Commonwealth heritage significance because of its association with early military history in NSW and for being the oldest surviving military barracks on the Australian mainland. The buildings represent good examples of Old Colonial Georgian architecture and include late nineteenth century buildings that provide good examples of Federation style architecture.

The proposed development at the subject site will contribute to the cumulative impact of increasing high rise development in the Parramatta Central Business District (CBD), which is in close proximity to the Lancer Barracks Precinct. The proposal will be one of the tallest buildings in the CBD and will therefore add to the visual impact for the Lancer Barracks Precinct. The impact however will be minimal because the proposed tower is adding to an already densely developed area that will have moderate impacts to the existing context and setting of the Lancer Barracks Precinct.

The proposed development at the subject site will have a **moderate adverse** visual impact on the heritage significance of the Lancer Barracks Precinct. The grading of impact is considered moderate due to the low scale visual buffer zone around the Lancer Barracks Precinct and the fact that the proposed tower will be highly visible from this site.

8.2.3 Parramatta Railway Station

Parramatta Railway Station is listed on the SHR (00696), Parramatta LEP 2023 (I 514), Transport for NSW Section 170 register (4801031) and National Trust (NSW) heritage register (9428). The item is located immediately opposite the proposed development.

The significance of the station relates to it being an early surviving example of a passenger railway station, which has been in use since 1859. The Parramatta Railway Station Group remains an important element contributing to the character of the Parramatta CBD.

Significant views to and from the station are identified in the Parramatta Railway Station CMP by Godden Mackay Logan dated 2003. These include views of moderate significance across the railway line to and from the Commercial Hotel as shown in Figure 68.

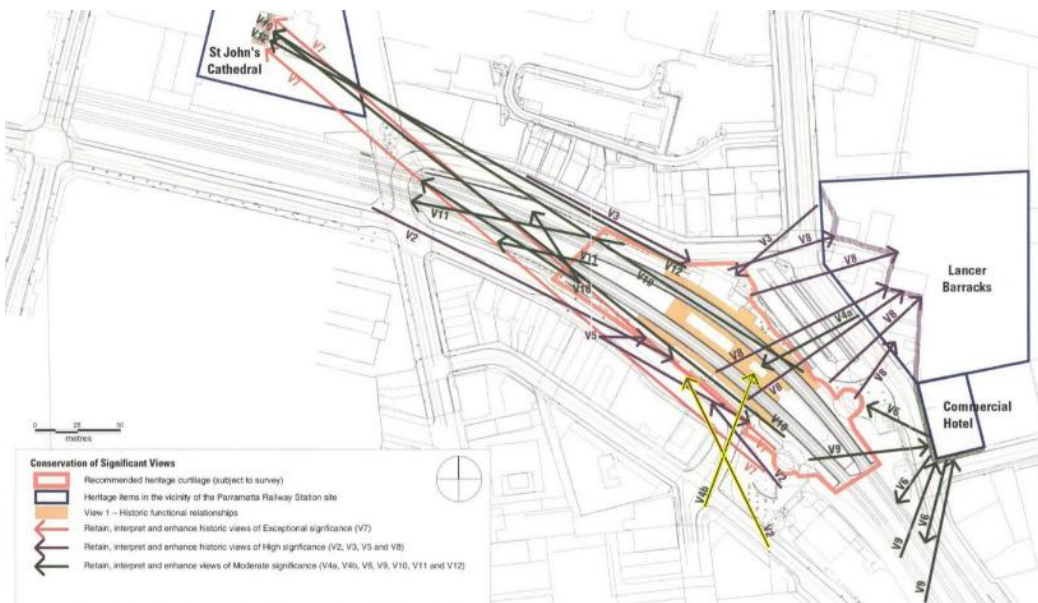


Figure 75: Significant views of the Parramatta Railway Station as illustrated in the Parramatta Railway Station CMP (Godden Mackay Logan, 2003)

The proposed tower will be a dominant feature in the vicinity of the Parramatta Railway Station and will be visible from the original station buildings and platforms. Despite the close proximity of the new development to Parramatta Railway Station, the proposed tower will only have a minor impact on the existing setting of the heritage item. The architectural articulation at the lower levels of the proposed tower softens the impact of the proposed new building. The proposed tower will sit comfortably with surrounding high-rise development within the centre of Parramatta.

Views from the public domain to the Parramatta Railway Station are limited. The proposed development will have no impact on existing views to the Parramatta Railway Station.

Overall, the proposed development has been assessed as having **little to no adverse impact** on the physical or visual heritage significance of Parramatta Railway Station.

8.2.4 St John's Anglican Cathedral

St John's Anglican Cathedral is listed on the State Heritage Register (SHR no 01805) and is located approximately 500m to the northwest of the subject site. St John's Anglican Cathedral is a prominent landmark and is an important element that contributes to the character of Parramatta CBD.

The proposed tower at 10 Valentine Avenue will sit within a collection of large towers that form the setting for St John's Anglican Cathedral. There will be a cumulative impact to the setting and context of St John's Anglican Cathedral as a result of the proposed tower and future high-rise development within the Parramatta CBD. The visual impact of the proposed development will be minimal as the sightlines between St John's Anglican Cathedral and the subject site are limited and obscured by existing high-rise buildings.

Overall, the proposed development has been assessed as having **little to no adverse impact** on the heritage significance of St John's Anglican Cathedral.

8.2.5 Lennox House

Lennox House is listed on the State Heritage Register (SHR no 00751) and is located approximately 320m to west of the subject site. Lennox House is currently surrounded by medium to high density commercial and residential development. There is likely to be minimal, if any, visual connection between Lennox House and the proposed development at 10 Valentine Avenue.

The identified heritage significance of Lennox House, as described in detail in part 5 of this report, will not be impacted by the proposed development. The proposed development has been assessed as having **little to no adverse impact** on the heritage significance of Lennox House.

8.2.6 1st/15th Royal NSW Lancers Memorial Museum Collection

1st/15th Royal NSW Lancers Memorial Museum Collection is listed on the State Heritage Register (SHR no 01824) and is located approximately 200m to the north of the subject site. The Museum is set in a small grassed open space area, to the north of the Parramatta Railway Station. This provides an opportunity for the subject site to be highly visible from the courtyard of the 1st/15th Royal NSW Lancers Memorial Museum Collection site.

The proposed tower will be one of the tallest constructed in the Parramatta CBD. The modulated façade of the proposed tower along with the landscaped area to the west of the building will soften the visual impact of the tower.

The identified heritage significance of 1st/15th Royal NSW Lancers Memorial Museum Collection, as described in detail in part 5 of this report will not be impacted by the proposed development.

The proposed development at the subject site will have a **moderate adverse** visual impact on the 1st/15th Royal NSW Lancers Memorial Museum Collection site due to the height and proximity of the proposed tower development.

8.2.7 Warders Cottages

Warders Cottages is listed on the State Heritage Register (SHR no 00709) and is located approximately 430m to the north of the subject site. Warders Cottages are currently surrounded by medium density development. The proposed development at 10 Valentine Avenue will not be visible from Warders Cottages.

The identified heritage significance of Warders Cottages, as described in detail in part 5 of this report will not be impacted by the proposed development. The proposed development has been assessed as having a **little to no impact** on the heritage significance of Warders Cottages.

8.2.8 Perth House and Stables

Perth House and Stables is listed on the State Heritage Register (SHR no 00155) and is located approximately 470m to the north of the subject site. Perth House and Stables are surrounded by medium to high density development. There is no visual connection between Perth House and Stables and the proposed development at 10 Valentine Avenue.

The identified heritage significance of Perth House and Stables, as described in detail in part 5 of this report, will not be impacted by the proposed development. The proposed development has been assessed as having **little to no impact** on the heritage significance of Perth House and Stables.

8.2.9 Experiment Farm Cottage

Experiment Farm Cottage is listed on the State Heritage Register (SHR no 00768) and is located approximately 600m to east of the subject site. While located outside the study area, there will be views to the proposed development from Experiment Farm due to the low rise, residential nature of development to the east of the subject site.

Experiment Farm is significant as it forms part of the first European land grant in Australia and is associated with early agricultural pursuits. The success of initial farming at Experiment Farm contributed to Parramatta being a location for free settlers to establish themselves. The original Experiment Farm Cottage is a finely detailed Colonial Bungalow, which remains in good condition.

The identified heritage significance of Experiment Farm, as described in detail in part 5 of this report will not be impacted by the proposed development. While the proposed tower at 10 Valentine Avenue is likely to be visible from Experiment Farm, it has been designed to ensure that it sits comfortably within the existing high-rise landscape and will make a positive contribution to the skyline of Parramatta

The proposed development has been assessed as having **little to no adverse impact** on the heritage significance of Experiment Farm Cottage.

8.2.10 Elizabeth Farm

Elizabeth Farm is listed on the State Heritage Register (SHR no 0001) and is located approximately 1km to the east of the subject site. Elizabeth Farm and gardens provide an important and rare example of European construction and plantings in Australia.

While the proposed tower at 10 Valentine Avenue is likely to be visible from Elizabeth Farm, it has been designed to ensure that it sits comfortably within the existing high-rise landscape. The elegant curves of the proposed tower will be a positive addition to the high-rise skyline of the Parramatta CBD. The proposed tower will add to the cumulative visual impact resulting from high density development within the Parramatta CBD.

The identified heritage significance of Elizabeth Farm, as described in detail in part 5 of this report will not be impacted by the proposed development. The proposed development has been assessed as having **little to no adverse impact** on the heritage significance of Elizabeth Farm.

8.2.11 Hambledon Cottage, Grounds and Archaeology

Hambledon Cottage, Grounds and Archaeology is listed on the State Heritage Register (SHR no 01888) and is located approximately 800m to the east of the subject site. Hambledon Cottage forms part of the Elizabeth Farm estate and is an intact example of an 1820s domestic building. The house and grounds provide examples of early construction techniques and some of the oldest surviving European tree plantings.

The identified heritage significance of Hambledon Cottage, Grounds and Archaeology, as described in detail in part 5 of this report will not be impacted by the proposed development. The proposed development at 10 Valentine Avenue is located a sufficient distance from Hambledon Cottage to not have any physical impact. The proposed new tower is likely to be visible from the Hambledon Cottage site, however, the result of the proposed development will be an addition to an already highly developed skyline, which would have no additional impacts to the context and setting of Hambledon Cottage, Grounds and Archaeology.

The proposed development has been assessed as having **little to no adverse impact** on the heritage significance of Hambledon Cottage, Grounds and Archaeology.

8.2.12 Shop and Office

The item known as Shop and Office is listed on the State Heritage Register (SHR no 00278) and is located approximately 500m to the northwest of the subject site. The item, Shop and Office, is located to the north of the Roxy Theatre and Parramatta Square, which obscures all views from the item to the subject site.

The proposed development will have **little to no adverse impact** on the heritage significance of the item known as Shop and Office.

8.2.13 Roxy Theatre

The Roxy Theatre is listed on the State Heritage Register (SHR no 00711) and is located approximately 500m to the northwest of the subject site. The Roxy Theatre is located to the north of Parramatta Square which block any views to the subject site.

The proposed development will have **little to no adverse impact** on the heritage significance of the Roxy Theatre.

8.2.14 Items in the vicinity that are listed on the Local Environmental Plan

There are multiple items of local heritage significance listed in the Parramatta Local Environmental Plan 2023. These items and the potential heritage impacts of the proposed development are discussed in Table 6.

Table 7: Heritage considerations for items in the Local Environmental Plan 2023

Local Environmental Plan 2023	Discussion
<i>Single storey shop (I 283)</i>	The locally listed Single storey shop is located approximately 250m to the east of the subject site. There are a number of single storey buildings in the immediate vicinity of the Single storey shop and there are clear views to numerous multi-storey developments. The proposed new tower will be visible from the subject site but will not be out of place in the existing context of high-rise development in the Parramatta CBD. The proposal will have little to no adverse impacts on the heritage significance of the Single storey shop.
<i>Convict Drain (I453)</i>	There will be no physical or visual impact to the heritage significance of locally listed Convict Drain. The proposed new tower is located a sufficient distance from the Convict Drain to negate any potential heritage impact. The proposal will have little to no adverse impacts on the heritage significance of the Convict Drain.
<i>Cottage and potential archaeological site (I454)</i>	The item known as Cottage and potential archaeological site are located a sufficient distance from the proposed tower that there will be no physical impacts and minimal visual impacts resulting from the proposed development. The proposal will have little to no adverse impacts on the heritage significance of the item known as Cottage and potential archaeological site.
<i>Warders Cottages (I455)</i>	Described above in Part 7.2.7. The proposed development has been assessed as having little to no impact on the heritage significance of Warders Cottages.

Local Environmental Plan 2023	Discussion
<i>Lennox house and adjoining brick wall on footpath (I458)</i>	Described above in Part 7.2.5. The proposed development has been assessed as having little to no adverse impact on the heritage significance of Lennox House.
<i>Masonic Centre (I 459)</i>	The Masonic Centre is located approximately 250m to the west of the subject site. Views from the Masonic Centre to the subject site were obscured by high-rise development in the vicinity. The proposed tower is likely to be visible from the Masonic Centre but has been assessed as having little to no heritage impact.
<i>Bicentennial Square and adjoining buildings (I461)</i>	The heritage item known as Bicentennial Square and adjoining buildings is located to the northwest of the proposed tower development. Views to and from the proposed tower will be obscured by existing high-rise development in this area. The heritage impacts to this heritage item have been assessed as little to no adverse impacts.
<i>Shop (former Fire Station) (I 462)</i>	Shop (former Fire Station) is a locally listed item makes a significant contribution to the local landscape and character of the area. The Shop (former Fire Station) is surrounded by medium to high density development. The proposal will add to this already dense landscape and will have minimal visual impacts. The proposed development has been assessed as having little to no adverse impact on the local item Shop (former Fire Station).
<i>Parramatta Town Hall and potential archaeological site (I463)</i>	The item known as Parramatta Town Hall and potential archaeological site are located a sufficient distance from the proposed tower that there will be no physical impacts and little to no adverse visual impacts resulting from the proposed development.
<i>Murrays Building and potential archaeological site (I464)</i>	The item known as Murrays Building and potential archaeological site are located in a high-density area within the Parramatta CBD. The site is located a sufficient distance from the proposed tower that there will be no physical impacts and little to no adverse visual impacts resulting from the proposed development.
<i>St Johns Anglican Cathedral (I465)</i>	Described above in Part 7.2.4. The proposed development has been assessed as having little to no adverse impact on the heritage significance of St John's Anglican Cathedral.
<i>St Johns Parish Hall (I466)</i>	The item known as St Johns Parish Hall is located in a high-density area within the Parramatta CBD. The site is located a

Local Environmental Plan 2023	Discussion
	sufficient distance from the proposed tower that there will be no physical impacts and minimal visual impacts resulting from the proposed development.
<i>Wardens Cottage, also known as Verger's Cottage (I467)</i>	The item known as Wardens Cottage is located in a high-density area within the Parramatta CBD. The site is located a sufficient distance from the proposed tower that there will be no physical impacts and little to no adverse visual impacts resulting from the proposed development.
<i>Centennial Memorial Clock (I468)</i>	The heritage item known as Centennial Memorial Clock is located to the northwest of the proposed tower development. Views to and from the proposed tower will be obscured by existing high-rise development in this area. The heritage impacts to this heritage item have been assessed as little to no adverse impacts.
<i>Horse Parapet Façade and potential archaeological site (I470)</i>	The item known as Horse Parapet Façade and potential archaeological site are located a sufficient distance from the proposed tower that there will be no physical impacts and little to no adverse visual impacts resulting from the proposed development.
<i>Llonells (I507)</i>	The local heritage item known as Llonells is located in a low-density area on the fringe of the Parramatta CBD. The proposed new tower is likely to be visible from the public domain areas surrounding Llonells however the impact on the visual setting of the item will be minimal. The proposed new tower will join an existing high-density skyline when viewed from the streets surrounding this heritage item. The heritage impacts to this heritage item have been assessed as little to no adverse impact
<i>Jeshyron (I508)</i>	The local heritage item known as Jeshyron is located in a low-density area on the fringe of the Parramatta CBD. The proposed new tower is likely to be visible from the public domain areas surrounding Jeshyron however the impact on the visual setting of the item will be minimal. The proposed new tower will join an existing high-density skyline when viewed from the streets surrounding this heritage item. The heritage impacts to this heritage item have been assessed as little to no adverse impacts.
<i>Parramatta Station (I 514)</i>	Discussed in Part 7.2.3 above. The proposed development has been assessed as having little to no adverse impact on the heritage significance of Parramatta Railway Station.
<i>Shops and potential archaeological site (I535)</i>	The heritage item known as Shops and potential archaeological site is located to the north of the proposed tower development. Views to the item known as Shops and potential archaeological site will be obscured by existing high-rise development in the

Local Environmental Plan 2023	Discussion
	vicinity, including Parramatta Square. There will be no additional impact generated by the proposed development. The heritage impacts to this heritage item have been assessed as little to no adverse impact.
<i>Roxy Theatre (I538)</i>	Discussed in Part 5.2.14 above. The proposed development is assessed as having little to no adverse heritage impact on the Roxy Theatre.
<i>Perth House Property, Moreton Bay Fig and potential archaeological site (I 539)</i>	Discussed in Part 7.2.8 above. The proposed development has been assessed as having little to no adverse impact on the heritage significance of Perth House Property, Moreton Bay Fig and potential archaeological site.
<i>Commercial Hotel (I 564)</i>	The Commercial Hotel is located approximately 100m east of the subject site separated by the railway line. The proposed 70 storey tower will result in direct visual impacts to the Commercial Hotel. The impacts to the Commercial Hotel have been assessed as moderate adverse as a result of the close proximity and visual connection between the two sites. The tower has been designed with a modulated curved façade to minimise the apparent bulk of the structure. A landscaped plaza to the western side of the proposed building will further reduce bulk and limit the impact to the Commercial Hotel and other items in the vicinity.
<i>Semi detached cottages (I 565)</i>	The locally listed Semi-detached houses are located approximately 300m to the east of the subject site. The impact of the proposed development will be minor. The proposed new tower is likely to be visible from the vicinity of the cottages due to its height but it will form part of the existing high-rise development in the Parramatta CBD. The proposed development has been assessed as having little to no adverse impacts on the locally listed Semi-detached cottages.
<i>Single storey residence (I570)</i>	The single storey residence is located in a low-density area on the fringe of the Parramatta CBD. The proposed new tower is likely to be visible from the public domain areas surrounding the Single storey residence however the impact on the visual setting of the item will be minimal. The proposed new tower will join an existing high-density skyline when viewed from the streets surrounding this heritage item.

Local Environmental Plan 2023

Discussion

The heritage impacts to this heritage item have been assessed as **little to no adverse** impact.

Single storey residence (I571)

The single storey residence is located in a low-density area on the fringe of the Parramatta CBD. The proposed new tower is likely to be visible from the public domain areas surrounding the Single storey residence however the impact on the visual setting of the item will be minimal. The proposed new tower will join an existing high-density skyline when viewed from the streets surrounding this heritage item.

The heritage impacts to this heritage item have been assessed as **little to no adverse** impact.

Two Storey Residence (I573)

The Two Storey Residence is located within a medium to high density area surrounded by high-rise development that forms part of the Parramatta CBD. The proposed tower may be visible but forms part of an existing skyline dominated by high rise development. The proposed tower will increase the existing impacts resulting from high density development in the Parramatta CBD.

The heritage impacts to this heritage item have been assessed as **little to no adverse** impact.

Cottage (I580)

The Cottage is located in a low-density area on the fringe of the Parramatta CBD. The proposed new tower is likely to be visible from the public domain areas surrounding the Cottage however the impact on the visual setting of the item will be minimal. The proposed new tower will join an existing high-density skyline when viewed from the streets surrounding this heritage item.

The heritage impacts to this heritage item have been assessed as **little to no adverse** impact.

Semi-detached Cottage (I581)

The Semi-detached Cottage is located in a low-density area on the fringe of the Parramatta CBD. The proposed new tower is likely to be visible from the public domain areas surrounding the Semi-detached Cottage however the impact on the visual setting of the item will be minimal. The proposed new tower will join an existing high-density skyline when viewed from the streets surrounding this heritage item.

The heritage impacts to this heritage item have been assessed as **little to no adverse** impact.

Semi-detached Cottage (I582)

The Semi-detached Cottage is located in a low-density area on the fringe of the Parramatta CBD. The proposed new tower is likely to be visible from the public domain areas surrounding the Semi-detached Cottage however the impact on the visual setting of the item will be minimal. The proposed new tower will join an

Local Environmental Plan 2023	Discussion
	existing high-density skyline when viewed from the streets surrounding this heritage item. The heritage impacts to this heritage item have been assessed as little to no adverse impact.
<i>Kia Ora and potential archaeological site (I584)</i>	Kia Ora and potential archaeological site is located to the northwest of the subject site directly across the Parramatta Railway Station. Views between the two sites are already obscured by high density development in the Parramatta CBD. The proposed new tower will be visible from the Kia Ora but will not impact the identified heritage significance of the site. The tower has been designed with elegant curves and a modulated façade to provide relief from the rectangular cube structures of high-rise development across the CBD. The proposed development has been assessed as having little to no heritage impact.
<i>Convict Barracks Wall (I 585)</i>	Convict Barracks Wall is located at the Arthur Phillip High School which is approximately 250m to the north of the subject site. The proposed 70 storey tower will result in direct visual impacts to the locally listed site. The impacts to this item have been assessed as moderate adverse as a result of the close proximity and visual connection between the two sites. The tower will have a large and dominating presence due to its height but has been designed to reduce this impact as far as possible.
<i>Leigh Memorial Uniting Church (I 586)</i>	Leigh Memorial Uniting Church is located to the northwest of the subject site directly across the Parramatta Railway Station. Views between the two sites are already obscured by high density development in the Parramatta CBD. The proposed new tower will be visible from the Leigh Memorial Uniting Church but will not have any adverse impacts to the heritage significance of the Church. The proposed tower has been designed to make a positive contribution to the skyline of Parramatta. The heritage impacts to this heritage item have been assessed as little to no adverse impact.
<i>Arthur Philip High School and potential archaeological site (I 587)</i>	Arthur Phillip High School and potential archaeological site is located approximately 250m to the north of the subject site. The proposed 70 storey tower will result in direct visual impacts to the locally listed Arthur Philip High School and potential archaeological site.

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The impacts to this item have been assessed as moderate adverse as a result of the close proximity and visual connection between the two sites. The tower will be a large and dominating presence. The tower will have a large and dominating presence due to its height but has been designed to reduce this impact as far as possible by the introduction of a curved, modulated façade and landscaped elements at the ground level.

The works have been assessed as having **moderate adverse** visual impacts to the item.

House/Industrial (I588)

There will be no physical or visual impact to the heritage significance of locally listed item known as House/Industrial. The proposed new tower is located a sufficient distance from the item to negate any potential heritage impact.

The proposal will have **little to no adverse impacts** on the heritage significance of the item known as House/Industrial.

Single storey residence (I589)

The single storey residence is located in a low-density area on the fringe of the Parramatta CBD. The proposed new tower is likely to be visible from the public domain areas surrounding the Single storey residence however the impact on the visual setting of the item will be minimal. The proposed new tower will join an existing high-density skyline when viewed from the streets surrounding this heritage item.

The proposal will have **little to no adverse impacts** on the heritage significance of the Single storey residence.

Residence – Mona (I590)

The heritage item known as Residence – Mona is located approximately 400m from the site of the proposed tower. It is located in a low-rise area of Parramatta which means there are likely to be some views from the public domain to the proposed tower. The tower has been designed to sit comfortably within the existing high-rise skyline of the Parramatta CBD.

The heritage impacts to this heritage item have been assessed as **little to no adverse** impact.

Attached House and Office (I591)

The item known as Attached House and Office is located in a low-density area on the fringe of the Parramatta CBD. The proposed new tower is likely to be visible from the public domain areas surrounding the Attached House and Office however the impact on the visual setting of the item will be minimal. The proposed new tower will join an existing high-density skyline when viewed from the streets surrounding this heritage item.

The proposal will have **little to no adverse impacts** on the heritage significance of the Attached House and Office.

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Single storey residence (I592)

The single storey residence is located in a low-density area on the fringe of the Parramatta CBD. The proposed new tower is likely to be visible from the public domain areas surrounding the Single storey residence however the impact on the visual setting of the item will be minimal. The proposed new tower will join an existing high-density skyline when viewed from the streets surrounding this heritage item.

The proposal will have **little to no adverse** impacts on the heritage significance of the Single storey residence.

Attached House and Office (I593)

The item known as Attached House and Office is located in a low-density area on the fringe of the Parramatta CBD. The proposed new tower is likely to be visible from the public domain areas surrounding the Attached House and Office however the impact on the visual setting of the item will be minimal. The proposed new tower will join an existing high-density skyline when viewed from the streets surrounding this heritage item.

The proposal will have **little to no adverse** impacts on the heritage significance of the Attached House and Office.

Single storey residence (I594)

The single storey residence is located in a low-density area on the fringe of the Parramatta CBD. The proposed new tower is likely to be visible from the public domain areas surrounding the Single storey residence however the impact on the visual setting of the item will be minimal. The proposed new tower will join an existing high-density skyline when viewed from the streets surrounding this heritage item.

The proposal will have **little to no adverse** impacts on the heritage significance of the Single storey residence.

Single storey residence (I595)

The single storey residence is located in a low-density area on the fringe of the Parramatta CBD. The proposed new tower is likely to be visible from the public domain areas surrounding the Single storey residence however the impact on the visual setting of the item will be minimal. The proposed new tower will join an existing high-density skyline when viewed from the streets surrounding this heritage item.

The proposal will have **little to no adverse** impacts on the heritage significance of the Single storey residence.

Single storey residence (I596)

The single storey residence is located in a low-density area on the fringe of the Parramatta CBD. The proposed new tower is likely to be visible from the public domain areas surrounding the Single storey residence however the impact on the visual setting of the item will be minimal. The proposed new tower will join an existing high-density skyline when viewed from the streets surrounding this heritage item.

Local Environmental Plan 2023	Discussion
	The proposal will have little to no adverse impacts on the heritage significance of the Single storey residence.
<i>Single storey residence (I597)</i>	The single storey residence is located in a low-density area on the fringe of the Parramatta CBD. The proposed new tower is likely to be visible from the public domain areas surrounding the Single storey residence however the impact on the visual setting of the item will be minimal. The proposed new tower will join an existing high-density skyline when viewed from the streets surrounding this heritage item. The proposal will have little to no adverse impacts on the heritage significance of the Single storey residence.
<i>Lancer Barracks Group (I 645)</i>	Discussed in Part 7.2.2 above. The proposed development at the subject site will have a moderate adverse impact on the Lancer Barracks Precinct.
<i>Attached Houses (I 664)</i>	Locally listed 'Attached Houses' are two story Victoriana terraces which are located approximately 1020m from the subject site. They are currently surrounded by medium to high density development and have no direct visual connection to the subject site. The proposal will have little to no adverse impacts on the heritage significance of the Attached Houses.

8.3 Questions to be considered in a statement of heritage impact

Design considerations are discussed in Table 8.

Table 8: Heritage considerations for the subject site (Source: NSW DPE, 2023).

Heritage Consideration	Discussion
General considerations for the proposal	
<i>Do the proposed works include removal of unsympathetic alterations and additions? How does this benefit or impact the heritage item and its significance?</i>	No. There are no physical works proposed to a heritage item. The proposed design has taken into consideration the heritage items in the vicinity and has incorporated design features to limit the impact on these items. Features such as a modulated, curved façade will reduce the overall bulk of the proposed tower.

Heritage Consideration	Discussion
General considerations for the proposal	
<i>Do the proposed works affect the setting of the heritage item, including views and vistas to and from the heritage item and/or a cultural landscape in which it is sited? Can the impacts be avoided and/or mitigated?</i>	The proposed tower will be visible from a number of heritage items in the vicinity as identified in this report. The proposal is one of many existing and planned high rise developments within the Parramatta CBD and will contribute positively to the high-density skyline. At the lower levels landscaping and a public courtyard have been incorporated to integrate the building with the heavily pedestrianised area.
<i>Are the proposed works part of a broader scope of works?</i>	No. Not applicable.
<i>Does this proposal relate to any previous or future works? If so, what cumulative impact (positive and/or adverse) will these works have on the heritage significance of the item?</i>	No. Not applicable.
<i>Are the proposed works to a heritage item that is also significant for its Aboriginal cultural heritage values? If so, have experts in Aboriginal cultural heritage been consulted?</i>	No. There will be no works to any heritage items associated with this application.
<i>Has the applicant checked if any other approvals or a separate process to evaluate the potential for impacts is required?</i>	Yes. The applicant has completed a comprehensive due diligence process and engaged the relevant technical experts to prepare reports and assessments to supplement this application.
<i>Do the proposed works trigger a change of use classification under the National construction code that may result in prescriptive building requirements? If so, have options that avoid impact on the heritage values been investigated?</i>	No. Not applicable.
<i>If the proposed works are to a local heritage item, are the requirements of the development control plans or any local design guidelines that may apply to the site considered?</i>	No. There will be no works to any heritage items associated with this application.
<i>Will the proposed works result in adverse heritage impact? If so, how will this be avoided, minimised or mitigated?</i>	This report has identified a small number of heritage items in the vicinity of the proposal that would experience a moderate adverse visual impact because of the proposed development. This report concludes that this level of impact is acceptable. The impacts have been mitigated as far possible through design

Heritage Consideration	Discussion
General considerations for the proposal	
	features such as the curved façade, siting of the building so that there is a courtyard and landscaping at street level.

A statement of heritage impact has been prepared according to Heritage NSW guidelines for assessing specific types of works in Table 9 below.

Table 9. Considerations for specific types of works

Development	Discussion
Works adjacent to a heritage item or in the heritage conservation area	
<i>Will the proposed works affect the heritage significance of the adjacent heritage item?</i>	The proposed development has been assessed as having an acceptable level of impact on heritage items within the vicinity as described in part 7.2 of this report. The building has been designed to make an elegant and positive contribution to the existing high-density development in the Parramatta CBD.
<i>Will the proposed works affect views to, and from, the heritage item? If yes, how will the impact be mitigated??</i>	Visual impacts to heritage items in the vicinity of the subject site have been addressed in detail in part 7.2. While some items will experience some visual impacts because of the proposed works, these impacts have been assessed overall as being acceptable. The proposed new tower development is located within an area of the Parramatta CBD that has been subject to high-density development for a number of years. The design of the proposed tower will make a positive contribution to the skyline and character of the Parramatta CBD.
<i>Will the proposed works impact on the integrity or the streetscape of the heritage conservation area??</i>	Not applicable. The proposed works are not in a Heritage Conservation Area.

8.4 Assessment against relevant policies

8.4.1 Parramatta Local Environmental Plan 2023

The following table provides and assessment against relevant clauses in the Parramatta Local Environmental Plan (LEP) 2001.

Table 10: Assessment against Parramatta LEP 2023

LEP Clause	Discussion
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5.10 Heritage Conservation

(1) Objectives *The objectives of this clause are as follows—*

<i>(a) to conserve the environmental heritage of Parramatta,</i>	The subject site is not a heritage item. The proposed works have been designed to sit comfortably within the existing high density setting of the Parramatta CBD. The proposed new tower will be an elegant addition to the Parramatta skyline which will not adversely impact the environmental heritage of Parramatta.
<i>(b) to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,</i>	It has been identified that some heritage items within the vicinity of the subject site will experience moderate adverse visual impacts because of the proposed development. On balance these impacts are considered acceptable given high-density development has been deemed permissible within the Parramatta CBD.
<i>(c) to conserve archaeological sites,</i>	Not applicable
<i>(d) to conserve Aboriginal objects and Aboriginal places of heritage significance.</i>	Not applicable

7.22 Managing Heritage Impacts

(1) *The objective of this clause is to ensure development in Parramatta City Centre:*

<i>(a) relates appropriately to heritage items and heritage conservation areas, and</i>	The proposed tower has been sited to allow for some landscaping between the tower and Parramatta Railway Station, which is the closest item to the subject site.
<i>(b) responds positively to the heritage fabric of the area, the street and surrounding areas.</i>	The proposed tower has a curved form with gently modulated façade to minimise the apparent bulk of the structure as far as possible. The plaza and landscaping to the ground floor level will also assist in minimising the visual impact of the proposed development.

(3) *Development consent must not be granted to development to which this clause applies unless the consent authority has considered the following:*

LEP Clause	Discussion
<i>(a) the extent to which the carrying out of the development is likely to affect the heritage significance of the relevant heritage item or heritage conservation area,</i>	The proposed works will have an acceptable level of impact on heritage items in the vicinity of the development. Details of the potential impacts are discussed in part 7.2 of this report.
<i>(b) a heritage impact statement,</i>	This Statement of Heritage Impact addresses this clause.
<i>(c) if the development involves a lot amalgamation, which includes a lot that contains, or is adjacent to, a heritage item—a heritage conservation management plan that identifies whether:</i>	Not applicable.
<i>(i) further lot amalgamations will be required to support the development of the land, while retaining the heritage significance of the heritage item, and</i>	Not applicable.
<i>(ii) the significance of the heritage item has been prioritised in the amalgamation of the lots,</i>	Not applicable.
<i>(d) the location of a tower, if proposed, having regard to the need to achieve an acceptable relationship with the relevant heritage item or heritage conservation area in terms of separation, setbacks, amenity and urban form.</i>	The design and siting of the proposed tower include setbacks from the street, plantings along the rail corridor and a landscaped plaza at the western corner of the site. These features combined with the curved façade were designed to ensure the building makes a positive contribution to the immediate streetscape as well as the Parramatta skyline. The proposal includes improvements to areas of the public domain, enhancing local amenity and character.

8.4.2 Physical heritage impacts

The proposed mixed-use development will have no physical impacts on the heritage items in the immediate vicinity including state listed item Parramatta Railway Station (SHR no 00696) and locally listed Shop (formerly a Fire Station) and Attached Houses. There will also be no physical impacts to other items identified as being within the vicinity of the subject site (500m radius).

8.4.3 Visual heritage impacts

Parramatta is experiencing a period of growth to respond to the increasing need for housing across the city. Many new towers have been constructed and more are planned which will result in a

cumulative impact on the heritage items across the city. The proposed tower will cause additional visual impacts to views to and from heritage items identified in this report due to the towers location and height.

Views to and from heritage items and conservation areas and vistas are an essential part of the character and cultural landscape of Parramatta. The proposed tower will be visible from some heritage items in the vicinity of the subject site as described in Part 7.2. However, the tower has been designed to sit comfortably within its setting and includes design features such as an internal plaza and landscaping to provide relief at a pedestrian level from the high-density development. There will be no additional visual impacts resulting from the works to the façade of the co-living building. Façade works are in keeping with existing colour schemes and materiality.

The visual impacts to the heritage items identified in this report range from little to no adverse impact to moderate adverse impact. The cumulative visual impact has been assessed as acceptable given the existing high-density development in the Parramatta CBD and design efforts used to minimise these impacts.

8.4.4 Summary of impacts to heritage items in the vicinity

This section summarises the assessment of physical and visual impacts of the proposed works on heritage items within the study area, and in its vicinity. The heritage impacts of the proposed works are outlined in Table 11.

Table 11: Assessment of heritage impact.

Item Name	Item/Listing Number	Potential physical impacts	Potential visual impacts
Old Government House and Domain	WHL No. 1306	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
Lancer Barracks Precinct	ID 105512	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having moderate adverse visual impacts to the item.
Parramatta Railway Station	SHR no 00696	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
St John's Anglican Cathedral	SHR no 01805	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.

Item Name	Item/Listing Number	Potential physical impacts	Potential visual impacts
Lennox House	SHR no 00751	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
Ist/15 th Royal NSW Lancers Memorial Museum Collection	SHR no 01824	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having moderate adverse visual impacts to the item.
Warders Cottages	SHR no 00709	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having a little to no adverse visual impact to the item.
Perth House and Stables	SHR no 00155	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having a little to no adverse visual impact to the item.
Experiment Farm Cottage	SHR no 00768	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
Hambledon Cottage, Grounds and Archaeology	SHR no 01888	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
Elizabeth Farm	SHR no 00001	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
Roxy Theatre	SHR no 00711	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having a little to no adverse visual impact to the item.
Shop and Office	SHR no 00278	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having a little to no adverse visual impact to the item.

Item Name	Item/Listing Number	Potential physical impacts	Potential visual impacts
Single storey shop	I 283	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
Convict Drain	I 453	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
Cottage and potential archaeological site	I 454	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
Warders Cottages	I 455	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impact to the item.
Lennox house and adjoining brick wall on footpath	I 458	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
Masonic Centre	I 459	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
Bicentennial Square and adjoining buildings	I 461	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impact to the item.
Shop (former Fire Station)	I 462	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
Parramatta Town Hall and potential archaeological site	I 463	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impact to the item.

Item Name	Item/Listing Number	Potential physical impacts	Potential visual impacts
Murrays Building and potential archaeological site	I 464	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impact to the item.
St Johns Anglican Cathedral	I 465	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
St Johns Parish Hall	I 466	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
Wardens Cottage, also known as Verger's Cottage	I 467	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impact to the item.
Centennial Memorial Clock	I 468	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as little to no adverse visual impact to the item.
Horse Parapet Façade and potential archaeological site	I 470	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impact to the item.
Llonells	I 507	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impact to the item.
Jeshyron	I 508	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impact to the item.
Parramatta Station	I 514	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.

Item Name	Item/Listing Number	Potential physical impacts	Potential visual impacts
Shops and potential archaeological site	I 535	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impact to the item.
Roxy Theatre	I 538	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impact to the item.
Perth House Property, Moreton Bay Fig and potential archaeological site	I 539	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impact to the item.
Commercial Hotel	I 564	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having a moderate adverse visual impact to the item.
Semi detached cottages	I 565	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
Single storey residence	I 570	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impact to the item.
Single storey residence	I 571	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impact to the item.
Two Storey Residence	I 573	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impact to the item.
Cottage	I 580	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impact to the item.

Item Name	Item/Listing Number	Potential physical impacts	Potential visual impacts
Semi-detached Cottage	I 581	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impact to the item.
Semi-detached Cottage	I 582	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impact to the item.
Kia Ora and potential archaeological site	I 584	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
Convict Barracks Wall	I 585	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having a moderate adverse visual impact to the item.
Leigh Memorial Uniting Church	I 586	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impact to the item.
Arthur Philip High School and potential archaeological site	I 587	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having moderate adverse visual impacts to the item.
House/Industrial	I 588	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
Single storey residence	I 589	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
Residence – Mona	I 590	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.

Item Name	Item/Listing Number	Potential physical impacts	Potential visual impacts
Attached House and Office	I 591	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
Single storey residence	I 592	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
Attached House and Office	I 593	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
Single storey residence	I 594	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
Single storey residence	I 595	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
Single storey residence	I 596	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
Single storey residence	I 597	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.
Lancer Barracks Group	I 645	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having moderate adverse visual impacts to the item.
Attached Houses	I 664	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having little to no adverse visual impacts to the item.

8.4.5 Cumulative impacts

Cumulative impacts refer to the combined or overlaid or added actions and interactions within a particular place associated with the past, present and the reasonably foreseeable future.

Parramatta has been identified as Sydney's second CBD with over half of Sydney's population projected to live west of Parramatta by 2036. The NSW Government's strategy 'A Metropolis of three cities' includes Parramatta as hub for the Central River City vision and provides a framework for the growth of Parramatta.

The City Parramatta Council adopted its own vision for the city titled 'Parramatta 2050'. These strategic documents provide a framework for the future high-density development in the Parramatta CBD. The vision set out in these documents is for a higher density Parramatta. The proposed tower development at 10 Valentine Avenue has been designed to respond to these plans and strategies.

8.5 Impacts to archaeological resources

As outlined in Section 5.0 above, the study area contains **low-moderate** potential for archaeological remains associated with the Austral Flour Mill (1895-1986) to be present at the site. These remains (including footings, services, surfaces, and other similar subsurface structures) are assessed as having no archaeological significance, and as such are not considered to be archaeological relics but rather 'works'.

The proposed development includes the demolition of the existing carpark in the southern section of the study area, and the construction of a new residential tower which features six basement levels in the footprint of the carpark. These basement levels would require substantial excavation in an area that included above-ground storage silos associated with the former Austral Flour Mill, but where there has been an unknown degree of ground disturbance as part of the foundation work for the existing carpark. The proposed excavations would therefore impact on remains that may include footings, services, and surfaces, which may be defined as 'works', and that have **low-moderate** potential for survival. If found intact, such remains would be unlikely to reach the threshold for local significance. It is noted that no excavation is proposed for the co-living building.

Given the absence of significant archaeological remains in areas of proposed ground disturbance caused by the construction of basements, the proposed development would have **little to no adverse** impacts to potential archaeological remains.

9.0 CONCLUSION

9.1 Conclusion

The subject site at 10 Valetine Avenue, Parramatta, also known as Lot 2 DP 1119257, is not listed on any heritage registers. For the purpose of this SoHI the study area includes all items within a 500m radius of the subject site. Within this area there are numerous state and locally listed heritage items.

Based on the available drawings for the project which were issued on 12 December 2025, the proposed works would result in the following heritage impacts:

- Physical impacts to heritage items in the vicinity will be minimal
- The following heritage items in the vicinity have been assessed as having moderate adverse impacts resulting from the proposed tower development:
 - Lancer Barracks Precinct
 - 1st/15th Royal NSW Lancers Memorial Museum Collection (impact to the site not the collection)
 - Convict Barracks Wall
 - Commercial Hotel; and
 - Arthur Phillip High School and potential archaeological site
- The remaining identified heritage items in the vicinity will have little to no adverse heritage impact resulting from the proposal.
- The study area has been assessed as containing **low-moderate** potential for archaeological remains associated with the former Austral Flour Mill. The potential remains have been assessed as having no archaeological significance and as such are not considered to be relics in the meaning of the Heritage Act.
 - Whilst the proposed development would likely require that subsurface archaeological remains be disturbed or fully removed this action would have **little to no adverse** impacts as no relics have been assessed to be contained within the site.

The overall heritage impact of the proposed development at 10 Valentine Avenue, Parramatta has been assessed as acceptable.

9.2 Approval pathway

The proposal seeks to establish a mixed-use development comprising residential accommodation (shop top housing and co-living housing) and retail uses at 10 Valentine Avenue Parramatta. The proposal is categorised as State Significant Development (SSD) in accordance with Section 27 of the State Environmental Planning Policy (Planning Systems) 2021. As such a State Significant Development Application (SSDA) will be required to be lodged with the Department of Planning Housing and Infrastructure. This SoHI supports this SSDA.

9.3 Recommendation

9.3.1 Built heritage

There are no heritage grounds to refuse this application. Consideration should be given to developing heritage sympathetic designs in line with the following recommendations:

- Given the association of the study area with the Austral Flour Milling company and the Arnott's Biscuits company, consideration should be given to installing heritage interpretation materials which relate the historical development of the mill and its relationship with the wider Parramatta and NSW communities.

9.3.2 Archaeology

It is recommended that the following mitigation measures are implemented prior to and during the proposal which requires ground disturbance including excavation works

ID	Mitigation Measure
Heritage Management	
	Unexpected Finds Procedure
<i>Mitigation measure 1</i>	As the study area has been assessed as having low-moderate potential to contain archaeological remains of no significance, it is recommended that potential archaeological resources be managed through an Unexpected Finds Procedure (UFP) that is developed for the proposal. Example UFP content is outlined below for consideration during preparation of the UFP: - If archaeological resources are identified during any stage of the project, works in the area must cease, the area adequately protected, and a suitably qualified archaeologist notified so as to carry out more detailed investigation and assessment - If the archaeological assessment determines that the remains are 'relics' in the meaning of the Heritage Act, the Department of Climate Change, Energy, the Environment and Water must be notified about the discovery of relics in accordance with Section 146 of the Heritage Act. Further approval/s may be required to allow the works to proceed.
	Heritage induction
<i>Mitigation Measure 2</i>	- All staff involved in the proposed works, including design professionals and tradespeople, must receive a heritage induction prior to the commencement of works. The heritage induction should cover the historical values of the site and the potential for the project to encounter significant archaeological resources - The induction should make contractors aware of the recommendations and mitigation methods included in this report, including the procedure to follow in the event that an unexpected archaeological find is encountered. Clear lines of communication must be established for the reporting of any such finds and for procedures to be rapidly implemented.

ID	Mitigation Measure
	General
<i>Mitigation Measure 3</i>	- Any additions or design modifications to the proposal, outside the scope of this assessment, would require additional heritage assessment to ensure consistency with this assessment - A copy of this report should be provided to Parramatta City Council and Heritage NSW to inform them of the proposal and the potential impacts to the study area.

10.0 REFERENCES

10.1 Secondary sources

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artefact

Artefact Heritage
ABN 73 144 973 526
Suite 56, Jones Bay Wharf
26-32 Pirrama Road
Pyrmont NSW 2009 Australia
+61 2 9518 8411
office@artefact.net.au
www.artefact.net.au