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By email- [joanne.glass@planning.nsw.gov.au](mailto:joanne.glass@planning.nsw.gov.au)

Dear Ms Glass

**RE: Heritage Council's comments on Environmental Impact Statement for Additional Crossing of the Clarence River at Grafton (SSI 6103).**

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I refer to your letter of 18 August 2014 to the Heritage Council of NSW (the Heritage Council), inviting public submissions on the Environmental Impact Statement (EIS) for the Additional Crossing of the Clarence River at Grafton.

On behalf of the Heritage Council, the Heritage Division, Office of Environment & Heritage (OEH), has reviewed the EIS, specifically Section 8.5 'Non-Aboriginal Heritage' and Appendix G 'Non-Aboriginal Heritage Assessment' and the enclosed comments in Attachment A are provided.

If you have any questions regarding the above advice, please feel free to contact Marc Allas on (02) 9873 8558 or by email at [marc.allas@environment.nsw.gov.au](mailto:marc.allas@environment.nsw.gov.au).

Yours sincerely



**Rochelle Johnston**  
Manager, Conservation  
Heritage Division  
Office of Environment & Heritage

As Delegate of the NSW Heritage Council

24 September 2014

## **NSW Heritage Council's comments on the Environmental Impact statement for the Additional Crossing of the Clarence River at Grafton.**

### **Main recommendations**

1. The EIS states that item CZB18 should be demolished to make way for a temporary construction compound. The demolition of a heritage item, even of local significance, for a temporary work is not supported.
2. It is unclear from the EIS documentation exactly how the turntable associated with the Grafton railway station will be impacted. Will the impact arise from the bridge itself, or the embankment? The turntable is a contributory item for the station and more detailed information should be provided to specifically identify how it will be impacted and what options for its retention, including potential design changes were considered.
3. Where architectural noise treatments have been suggested in the EIS, the exact treatment should be specified. Traffic flows and noise levels can be predicted and therefore the level/type of noise treatment necessary should also be discussed.
4. The proposed flood mitigation works have not been clearly identified. Page 226 of Appendix G states the following recommendation: "Any construction and clearance activities within or adjacent to the curtilage of heritage items should be sympathetic as to minimise the removal of or impact to associated heritage values". Without understanding the scope and extent of works and infringement on heritage items, the Heritage Division cannot comment on potential impacts on the heritage items to be affected by the flood levee alterations, including one item listed on the State Heritage Register ("Arcola", 150 Victoria St, Grafton) .

It is unclear whether the EIS provides enough details on the flood mitigation works to describe the development for consultation purposes. Any approval under the *Heritage Act 1977* will be switched off due to the proposal being state significant development. Nonetheless, the flood levee works need to be clearly described, including how they would impact on "Arcola" and any archaeology that may be present. . The EIS may need to be readvertised so that meaningful comment can be provided.

5. The applicant's proposed environmental management requirements on page 398 state that a construction heritage management plan (CHMP) will be prepared as part of the 'construction environmental management plan for the project'. The details of a CHMP should have been included in the EIS. No approvals should be issued until a CHMP has been prepared. The Heritage Council could provide comments on the CHMP.
6. If an approval is issued, the Environmental Mitigation Measures NH1 to NH10 (Summary of Environmental measures, page 398 of the EIS) should be included as conditions of consent for any approval, subject to the following modifications:
  - o NH1: The heritage interpretation plan must be developed in consultation with Clarence Valley Council and the local community.
  - o MH4: The draft CHMP must be provided to the Heritage Council for comment prior to finalisation.

### **Particulars on the recommendations**

#### **Noise treatments**

Although out of the zone of works, there are several properties that have been identified as requiring potential noise treatment. However details of the noise treatment proposed are not provided (these properties include CZB15 Dwelling (Clarence Street residential Group 2) (Item no. I520), CZB22 Dwelling (Kent Street Residential Group 2) (Item no. I627), CZB23 Dwelling (Kent Street Residential Group 2) (Item no. I626), CZB24 Dwelling (Kent Street Residential Group 2) (Item no. I625), CZB29 Residential (item no. I693), CZB34 Residential (Item no. I690)). The details of those treatments proposed and a description of the expected impacts on the site should be addressed.

This same point applies to other properties that have been identified as having 'direct partial impacts'. Certain properties (CZB10 Dwelling ("Ravensford") (Item no. I841); CZB13 Street Trees Pound Street, and CZB11 Former residence "Dunvegan" (Item no. I115)) will be impacted by the widening of Pound Street which will involve the removal of the street trees at the corner of Pound and Villiers Streets and also acquisition of some of the land around Ravensford. The setting will be impacted by the works and the EIS states that these properties may require architectural noise treatment, but again without further details of the treatment.

Also, the applicant has recommended an archival recording for these properties, specifically in relation to views to and from the property. The description of impacts outlined above is inconsistent with the conclusion in the Statement of Heritage Impact in Appendix G which states that there will be no impact of heritage significance for these properties.

### **Railway viaduct**

The railway viaduct (CZB20 Grafton Railway Viaducts (Items I687)/ (S170) CZB21 Grafton Railway Viaducts (Items I514)) will be demolished and replaced with a new single span bridge to allow sufficient height underneath the bridge and width for a new road. The Heritage Impact Statement recommends that the new bridge should have art deco style and archival recording should be done. It is unclear what works are proposed to introduce art deco styling to a single span bridge

The King George V Plaque (CZB19, Item no. I688), located on the viaduct, is proposed to be salvaged, stored and reinstated on the new viaduct. We consider this to be an acceptable response.

### **Direct Impact Whole – Demolition**

The following properties of local heritage significance listed below have been identified for complete demolition, with archival recording being required. On the basis that these are directly within the project area that has been chosen for the bridge works, this seems acceptable.

*CZB25 Dwelling (Kent Street Residential Group 1) (Item no. I621); CZB26 Dwelling (Kent Street Residential Group 1) (Item no. I622); CZB27 Dwelling (Kent Street Residential Group 1) (Item no. I623); CZB28 Dwelling (Kent Street Residential Group 1) (Item no. I624); CZB30 Dwelling ("Clarendon") (Item no. I692); CZB31 Dwelling; CZB32 Dwelling; CZB33 Dwelling; CZB35 Glyndon Private Hospital former (Item no. I616)*

The dwelling known as CZB18, Item no. I688 has been identified for demolition to install a temporary construction compound. It is adjacent to a large open area of land. The applicant has proposed archival recording as mitigation. The permanent destruction of a local heritage item should be the last resort, especially if it is to be replaced by a temporary compound.

Further consideration should be given to avoid any impact and where impact cannot be avoided, then the impact should be minimised.

A rail turntable (CZB37 Grafton City Railway Precinct (Item no. I372)) has been identified as needing demolition in spite of it being listed as a significant item in the register kept under section 170 of the *Heritage Act 1977*. It is unclear whether the turntable will be removed due to it being directly in the line of the bridge or whether in the embankment area. There is insufficient information to demonstrate why demolition is the best option for this site. There should be a heritage impact assessment to evaluate the options, of which retention should be one.