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Mr Peter McManus
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Sent by e-mail to: peter.mcmanus@planning.nsw.gov.au

Dear Mr McManus

Request for comment on exhibition of Environmental Impact Statement for Stage 2 Design and Construction for the Western Sydney Stadium (SSD 8175)

Reference is made to your correspondence received on 10 March 2017 requesting comment on the exhibition of the EIS from the Heritage Council of NSW for the above proposal.

Impacts to State Heritage Values

The Western Sydney Stadium project is partially located within the State Heritage Register (SHR) curtilage of Parramatta Park and Old Government House. Parramatta Park and Old Government House provide a unique and rare demonstration of the evolution of New South Wales and Australian Society since 1788. The Park has evolved from being one of the earliest successful agricultural sites of the colony, to one of the most important and earliest open spaces dedicated for public use. Parramatta Park retains strong associations with the local Aboriginal community and is a European and Aboriginal archaeological resource of national significance.

The Heritage Council's submission on the Stage 1 Concept Approval (SSD 7534) dated 25 August 2016, stated that while the current Parramatta Swimming Centre and Stadium has already impacted the heritage values of the Park; the size, scale and light towers of the new stadium would constitute a greater degree of intrusion that would have an adverse impact on the significant views, setting and cultural landscape values of Parramatta Park and Old Government House, key components of the Australian Convict World Heritage sites.

The Stage 2 SSD proposes a stadium constructed of rectangular structural steel elements, with stadium lighting built into the roof structure made of stretched white fabric, and exterior cladding of a mid to dark grey finish for the lower exterior structural steel elements graduating to white on the upper levels. The detailed design is considered to reduce the visual bulk of the already approved stadium envelope, particularly through avoiding light towers by integrating lighting into the structure. To further reduce impacts, it is recommended that darker finishes are explored for the roof fabric, and that unobtrusive signage is designed at this stage of the project to ensure a consistent design approach. It should be noted that any future applications for signage within the SHR curtilage will require approval under the *Heritage Act 1977*.

The proposed large video screen on the northeast corner of the Stadium does not face Parramatta Park. However it will have a high visual impact as viewed from the public domain. It is recommended that the impacts of the screen are assessed through visual impact analysis

that should be submitted to the Heritage Council for comment. Depending on the findings of this analysis, the screen should either be deleted, or projections limited to specific times only.

Visual Impacts

Specific concerns were raised regarding the visual impacts of the Stage 1 building envelope to World Heritage values, particularly the important views identified in the *Conservation Agreement for the protection and Conservation of the World Heritage Values and National Heritage Values of the Australian Convict Sites. Old Government House and Domain, Parramatta New South Wales* (Conservation Agreement). These concerns were clarified at Stage 1. The Heritage Council requested further assessment at Stage 2 to demonstrate how the detailed design and materials of the new stadium may impact upon these views.

The Stage 1 Visual Impact Assessment (VIA) provided views of the envelope of the new stadium from a number of vantage points, including those identified in the Conservation Agreement. The Stage 2 VIA also includes the Conservation Agreement views. However interprets their exact locations differently to the Stage 1 VIA. The images are also much smaller, which makes it difficult to compare how the potential impact to views has been minimised through the detailed design. At this stage not enough information has been provided to adequately assess the visual impacts of the stadium.

It is recommended that the Stage 2 VIA is revised to provide larger, more detailed images depicting the same Conservation Agreement views shown in the Stage 1 VIA. The VIA should also provide views from surrounding places of heritage significance where the new stadium would be a prominent new element; including views facing north along O'Connell Street showing the stadium in the context of Parramatta Park and Old Kings School, from Old Kings School facing west towards the new Stadium, and from the intersection of O'Connell Victoria Road, showing the video screen in the context of the streetscape.

Impacts to the Landscape

The Tree Removal Plan provided with this application indicates that 41 additional trees are proposed for removal as part of the Stage 2 SSD. However there is some discrepancy in the Statement of Heritage Impact where it suggests that 75 additional trees are proposed to be removed. The landscape mitigation measures proposed in the Statement of Heritage Impact are supported, However it should be incorporated into the landscape design at this stage of the project, rather than as a condition of consent following approval. It is also noted that approximately 15 trees may require removal, subject to the reconfiguration of Parramatta Park Trust's southern carpark. The detailed design of the southern carpark should be finalised at this stage of the project and the Statement of Heritage Impact should be revised to assess the final landscape design.

Interpretation

The Heritage Interpretation Strategy for Western Sydney Stadium, prepared by Musecape, 6 March 2017, provides a general overarching framework for interpretation at the site but doesn't identify exact interpretive devices. This is appropriate given that locations for interpretation will be determined by the final approved design. As such, the Interpretation Strategy should form the first stage of the broader interpretive planning process and be developed in tandem with the stadium's detailed design. The subsequent stages of interpretive planning should involve specific interpretive content development and physical implementation of the interpretive elements prior to occupation of the site. Given the extent of community interest in this project, it is recommended that community consultation is sought regarding the Interpretation Strategy.

Archaeological Impacts

As noted in previous archaeological assessments for Stage 1 and a s96 modification the project area has the potential to contain archaeological information of State and potentially National heritage significance related to elements of the Government Farm and Watermill. It is acknowledged that the current Stage 2 design has aimed to avoid impact to archaeological information, however a number of elements are not clear in their scope to confirm that impacts

to archaeological information will not occur. This is particularly true of the signage proposed for Parramatta Park, the landscaping and tree planting.

Additionally, an archaeological research design was prepared within this assessment, to cover both the Stage 1 and s96 modification works and the current Stage 2 works. This research design proposed to test areas of archaeological potential to reveal the levels of State significant archaeology surviving under areas of contamination and to guide the contamination removal works without removing State significant archaeology. This includes archaeological monitoring of machine and archaeological hand excavation with some sampling to ensure soil and archaeological levels are clearly identified.

While the archaeological research design is considered to be adequate to manage the initial investigation of archaeology at the site, clear issues remain with understanding the project timing across the Stage 1, Stage 2 and modification works and how the results of the archaeological program will be incorporated into the other works proposed on site to protect archaeology throughout development and operation of the stadium. It is noted that the s96 modification application for Stage 1 has not been approved and the response to submissions for this proposal may result in additional heritage requirements which may also impact the Stage 2 works. As such, recommended conditions have been included to ensure the archaeological program occurs in a timely manner, with the results clearly incorporated into the construction and operation programs for the development prior to the commencement of Stage 2 works.

Additionally, while this research design has been included in the Stage 2 works, this research design may need to be submitted to fulfil previous recommendations made to the modification application to the Stage 1 works.

Recommended Conditions

If approved, the following conditions are recommended:

- 1) The Landscape Drawings and Architectural Plans should be revised to show the final design of Parramatta Park Trust's Southern Carpark and any signage required for the approved use. Darker finishes should be explored for the roof fabric.
- 2) The Visual Impact Assessment should be revised to provide larger, more detailed images depicting the same Conservation Agreement views shown in the Stage 1 VIA and provided to the Heritage Council for comment. The VIA should also provide views from surrounding places of heritage significance where the new stadium would be a prominent new element; including views facing north along O'Connell Street showing the stadium in the context of Parramatta Park and Old Kings School, from Old Kings School facing west towards the new Stadium, and from the intersection of O'Connell Victoria Road, showing the illuminated signage in the context of the streetscape.
- 3) The Landscape Drawings should be revised to indicate the final extent of trees proposed for removal, as well as proposed new plant species. Planting should include a mix of non-invasive native evergreen canopy trees appropriate to the locality, selected with height at maturity of 20m to 40m and proven performance in the local environment. The Statement of Heritage Impact should be revised to assess the final landscape design.
- 4) The detailed Interpretive Plan should be developed in tandem with the stadium's detailed design. Given the extent of community interest in this project, it is recommended that community consultation is sought regarding the Interpretation Strategy. Subsequent stages of interpretive planning, involving specific interpretive content development and physical implementation of the interpretive elements, should be undertaken prior to occupation of the site. A final Interpretation Plan, including details of the archaeological investigation of the site and how the results will be incorporated into the development, should be provided to the Heritage Council for review and comment prior to finalisation and implementation.
- 5) Any existing significant trees or other vegetation to be retained should be protected during implementation of the Proposal in accordance with current best practice in arboriculture,

as recommended by the consulting arborist and in accordance with Australian Standard - Protection of trees on development sites AS4970-2009.

- 6) Any works to significant trees and other vegetation on site must be carried out in accordance with current best practice in arboriculture by or under the direct supervision of appropriately qualified arborists and in accordance with the Arboriculture Australia Code of Ethics. All tree works should be performed in accordance with Australian Standard AS4373-1966 'Pruning of Amenity Trees' and WorkCover Code of Practice for Amenity Tree Industry, 1998.
- 7) Measures should be taken to ensure that during construction there is no runoff or spillage of concrete, adhesives or other waste from the site that might have a negative impact on heritage values or the environment generally.
- 8) The remediation action plan shall be updated prior to works commencing to incorporate the archaeological testing program and detail how the archaeological program will be able to be undertaken both safely and efficiently to the satisfaction of the Heritage Council of NSW or its delegate.
- 9) Prior to the commencement of works associated with Stage 2, the results of the archaeological test excavation are sent to the Heritage Council for review and comment. This information will include a summary of the archaeological results and evidence, to the satisfaction of the Heritage Council of NSW for how the results are being used to guide all other below ground works in Stage 2 to ensure archaeological information is being protected.
- 10) All proposed interpretation, landscaping and tree planting is sensitively designed to avoid impact to archaeological information to the satisfaction of the Heritage Council of NSW.
- 11) If the joint archaeological and contamination testing program identifies avoidance of significant archaeological resources/sites in whole or in part is not possible to achieve the decontamination of the site, a detailed archaeological salvage of the proposed impact areas shall be undertaken. Prior to this occurring a new archaeological research design and excavation methodology should be prepared to the satisfaction of the Heritage Council of NSW or its delegate. The archaeological program must be directed by a suitably qualified and experienced excavation director who fulfils the Heritage Council's Excavation Director Criteria for the excavation of state significant archaeological sites.
- 12) A final excavation report shall be prepared within 12 months of the completion of archaeological works on site. It shall also include details of any artefacts recovered, where they are located and details of their ongoing conservation and protection in perpetuity by the land owner. Copies of the final report shall be provided to the Department of Planning and Environment, the Heritage Council and to the City of Parramatta Local Studies unit.
- 13) The project shall ensure that any contaminated material stored on site is not stored in areas of archaeological sensitivity identified by the supporting archaeological assessment and any additional areas during excavation by the Excavation Director.

Other Issues Arising

It should be noted that if this project is approved:

- Any future works relating to this project within SHR curtilage and not assessed as a State Significant Development or State Significant Infrastructure project, will require approval under the *Heritage Act 1977*.
- Any future development relating to this project outside of the SHR curtilage and not assessed as a State Significant Development or State Significant Infrastructure project, may require archaeological approvals under the Section 139 of the *Heritage Act 1977*.
- The notification of any transfer of land relating to the State Heritage Register items should be provided to the Office of Environment and Heritage

- The Parramatta Park Master Plan, which was approved by the Heritage Council in November 2015, would need to be updated to include the approved works or any change in ownership and/or curtilage.

It is noted that separate comments on the Aboriginal archaeological and cultural values of the project will be provided by the Metropolitan Regional Branch of the Office of Environment and Heritage.

The Heritage Council would appreciate an opportunity to provide comment to the Department of Planning and Environment on this State Significant Development at the following stages:

- i. response to submissions including comment on any revisions to the proposal as a result of submissions and
- ii. draft conditions of approval.

If you have any questions regarding the above matter, please contact Verena Mauldon, Heritage Assessment Officer, at the Heritage Division, Office of Environment and Heritage on telephone (02) 9895 6512 or at verena.mauldon@environment.nsw.gov.au.

Yours sincerely



Dr Siobhan Lavelle OAM

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Heritage Division

Office of Environment & Heritage

As Delegate of the Heritage Council of NSW

18 April 2017