



File No: SF17/8626
Ref No: DOC17/95419

Mr Peter McManus
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Department of Planning & Environment
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Sent by e-mail to: peter.mcmanus@planning.nsw.gov.au

Dear Mr McManus

Request for comment on Section 96(2) Modification Application to Stage 1 Demolition Works for Western Sydney Stadium, 11-13 O'Connell Street, Parramatta (SSD 7534)

Reference is made to your correspondence received on 7 February 2017 requesting input from the Heritage Council of NSW (the Heritage Council) for the modifications to the above proposal. The proposed modification seeks to expand the range of physical works approved under the Stage 1 DA to complete the required site preparation works. Specifically, the early works include remediation with associated earthworks and piling.

On behalf of the Heritage Council the following documents have been reviewed in the preparation of this response:

- Section 96 Modification Application, SSD 7534 Western Sydney Stadium 11-13 O'Connell Street Parramatta, prepared by JBA, dated 6 February 2017.
- Western Sydney Stadium Historical Archaeological Assessment and s96 Modification Heritage Impact Statement, prepared by Casey and Lowe Pty Ltd, dated January 2017.
- Remedial Action Plan, Western Sydney Stadium Redevelopment, prepared by Senversa, dated 2 February 2017.

The project is located adjacent to Parramatta Park. A section of the project encroaches on the World Heritage Area buffer zone for the Parramatta Park and Old Government House portion of the Australian Convict Sites listing. This area is proposed to contain a stormwater element and outfall into Parramatta River. It is considered that these works should be sensitively designed to avoid this World Heritage Area buffer zone and ensure that the significant values of this area are protected.

The proposed removal of contaminated material also has the potential to impact archaeological information of State and potentially National heritage significance related to elements of the Government Farm and Watermill. To mitigate this impact the archaeological assessment has recommended archaeological testing of contaminated areas and the redesign of contamination removal methods to protect significant archaeological deposits.

While the overall archaeological recommendations are considered appropriate, the associated documentation including the Remedial Action Plan, does not indicate how the archaeological testing program is to occur within the overall remediation works program safely and efficiently. This information is essential to understanding how archaeological information will be protected in accordance with current conditions. Additionally, an archaeological

research design was not present to guide the works. This is a standard document required to guide the management of archaeological resources during excavation.

Overall, to ensure historical archaeology and heritage is protected the following additional conditions are recommended for inclusion for this modification:

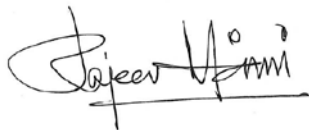
1. All current heritage conditions of approval shall remain unchanged.
2. The stormwater elements, and its outfall into the Parramatta River shall be sensitively designed to avoid the World Heritage Area buffer zone associated with Parramatta Park and Domain.
3. A phase of archaeological testing shall be undertaken across areas of proposed harm as soon as possible to inform the remediation and detailed design for this project. Identification and avoidance of state significant archaeological deposits and substantially intact archaeological evidence shall be employed by the works.
4. The testing shall be guided by an archaeological research design and excavation methodology devised to the satisfaction of the Heritage Council of NSW or its delegate and 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.
5. 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.
6. If the joint archaeological and contamination testing program identifies avoidance of significant archaeological 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.
7. 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.
8. An Interpretation Plan shall be prepared and provided to the Heritage Council of NSW for review within 18 months of the completion of archaeological excavations on site. This Plan shall include details of the archaeological investigation of the site and how the results will be incorporated into the completed development. This shall be prepared in accordance with relevant Heritage Council guidelines.
9. 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.

It is understood that the detailed design for the Stage 2 works is undergoing continued investigation and at this stage no construction works are proposed as part of the current modification. In addition to the conditions noted above, the Heritage Division reiterates the previous overall recommendations for this project including:

1. The visual impact assessment and visual analysis should address impacts to 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.
2. Detailed architectural drawings showing the heights, appearance and light-shed of Stadium lighting, the height and bulk of the existing Stadium in relation to the new Stadium, and the detailed design of areas within the State Heritage Register (SHR) and World Heritage curtilage, including the proposed Parkland Transition Zone, should be provided to inform how the project may affect the cultural heritage values of Parramatta Park and Old Government House, as well as the Parramatta Park Master Plan.

If you have any questions regarding the above matter, please contact Rebecca Newell, Archaeologist, at the Heritage Division, Office of Environment and Heritage on telephone (02) 9873 8517 or by e-mail: Rebecca.Newell@environment.nsw.gov.au.

Yours sincerely



Rajeev Maini
Manager, Conservation
Heritage Division
Office of Environment & Heritage
As Delegate of the Heritage Council of NSW
24 February 2017