

19 October 2017

The Director - Infrastructure Projects  
Planning Services  
Department of Planning and Environment  
GPO Box 39 Sydney NSW 2001

Dear Director,

**National Trust Submission on Parramatta Light Rail – Stage 1  
Environmental Impact Statement - Application number SSI 17\_8285**

The National Trust raises strong concerns regarding the Parramatta Light Rail – Stage 1 Project, the inadequacies of the Environmental Impact Statement and its failure to address the impacts of the development on buildings, precincts, landscapes and archaeology of heritage significance.

It would have been reasonable to expect that after the major public outcry at the impacts of the Sydney Light Rail and its chosen route causing major unacceptable impacts on the fig tree avenues of Anzac Parade and Alison Road that the Parramatta Light Rail would have properly indicated the full impacts of the proposal for public appraisal and comment.

This does not appear to be the case. In this submission the National Trust will set out the failings of the Environmental Impact Statement and the likely major adverse impacts of this development on the heritage of Parramatta.

Since its establishment in the mid 1940s the National Trust has been identifying, assessing and recording places of historic, social, scientific and aesthetic significance which should be conserved as the heritage of the current and future generations. The work of the National Trust pre-dated statutory listing by local, state and national governments by more than thirty years. The Trust continues to regularly update its Register with items and places not yet recognised on statutory listings. The National Trust Register better reflects evolving public aspirations and counters the tardiness of statutory listings to respond to those expectations.

The Environmental Impact Statement did not take into account the listings on the National Trust Register, limiting itself to only statutory listings.

The National Trust's 1946 Register of 39 places included the Parramatta Lennox Bridge and the 1949 Register listed a further 28 places. The current (2017) National Trust Register contains 193 places in Parramatta and numerous more places along the proposed light rail route in other suburbs.

**Lennox Bridge**

Listed on the National Trust Register in 1946 and in the State Heritage Register in 1999. The historical notes on the State Heritage Register Listing conclude – "In the 1990s Lennox Bridge was saved from demolition by campaigning by the National Trust of Australia (NSW)." This campaigning resulted in the placement of a Permanent Conservation Order on the bridge in October, 1991.



The Environmental Impact Statement does not indicate whether the light rail will cross on the historic 1836 bridge or on the western 1934-5 concrete new bridge span. The Statement does not give any clear indication of the impacts of the project on Lennox Bridge. There is no point in preparing an Environmental Impact Statement and its associated Heritage Impact Statement if these documents do not state the environmental and heritage impacts on one of Australia's most historic and earliest bridges. The rail line should utilize the western (concrete) bridge and avoid adverse impacts on the 1836 bridge.

### **St Patrick's Roman Catholic Cemetery**

Listed on the National Trust Register in April, 1976, St Patrick's Roman Catholic Cemetery was one of the earliest cemeteries in the Colony of New South Wales making it of both State and National Significance. The earliest grave being that of Thomas Nugent dates from 29 April, 1824. The cemetery was listed on the State Heritage Register in 2012.

There have been a series of damaging road widening proposals on Church Street to allow for extra bus lanes. These proposals had major adverse impacts on the Church Street edge of the cemetery including relocation of footstones and headstones to the Mortuary Chapel courtyard, relocation of iron cemetery gates and sandstone entrance pillars and the relocation of at least seven headstones (but not the burials) to allow for road widening.

Further damage to the cemetery is unacceptable. The light rail project has the potential to impact on unmarked graves the potential existence of which has been investigated and found to be likely. The proposed station on Church Street is too close to the cemetery and would certainly impact visually on the cemetery. The Station should be relocated further from the cemetery and the rail line route needs to be relocated so as not to impact on the archaeology and likely unmarked burials of the cemetery along Church Street.

### **Parramatta North**

The Trust is pleased that Option 2 was not chosen for the light rail route across the Parramatta River to Westmead Children's Hospital. Option 2 would have had a far greater impact in many ways on views and native vegetation. However lack of detail in the Environmental Impact Statement makes it impossible to determine the impact of the Option 1 new bridge across the Parramatta River. Three buildings (C52a, C67 and C72 – UrbanGrowth Development Application) are proposed for demolition as part of the Parramatta North Urban Transformation Project. They would also need to be removed for the Light Rail Project but the heritage impacts are not assessed in the Light Rail Environmental Impact Statement as it is argued that the buildings are proposed for demolition in another development proposal. But what would be the result if an approval condition for the UrbanGrowth Project required the retention of these buildings?

If the buildings are on the route of the Light Rail then the Light Rail EIS must address the heritage impacts of their removal otherwise the full heritage impacts of this project are being under-stated.

There is the potential for highly significant archaeology along the route of the light rail through the Parramatta North precinct. The Environmental Impact Statement must have regard to all recent archaeology undertaken in this area and, having taken this into account, and only then, should set out a precise route to avoid disturbing significant archaeology.

Similarly, the siting of a station should only be determined after a proper review of recent archaeology investigations and having taken into account those investigations, only then should a site be chosen to minimize all possible impacts.

### **Arthur Philip High School, Macquarie Street – Convict Lumberyard and Convict Barracks**

The remains of this highly significant site were identified recently in conjunction with archaeological investigations relating to the State Significant Development Arthur Philip High School. The remains of a wall



of the Convict Lumberyard are being restored under the approval conditions of the Arthur Philip High School development. It appears that the Light Rail Project may impact this site due to the positioning of a light rail construction compound, utilities adjustment and a substation. These facilities need to be re-sited to ensure the continuing conservation of the convict building remains.

#### **Ancient Aboriginal and Early Colonial Landscape – Robin Thomas Reserve, Harris Park**

The Light Rail Project will have a major and unacceptable impact on the State Heritage Register Listed “Ancient Aboriginal and Early Colonial Landscape” listing beside Harris Street in Robin Thomas Reserve, Harris Park. The State Heritage Register Listing indicates that the antiquity of some of this archaeological record and evidence of change over time is significant to Australian archaeology generally. The site of the Military Barracks and Soldiers Garden is a rare archaeological site. It is one of two military barracks built during the period of Governor Arthur Phillip’s term as Governor of NSW. The site which was occupied in May 1791, has the potential to provide the earliest surviving physical evidence of a convict period military barracks in Australia.

The present route and design of the light rail proposal will cause major damage to this site. There needs to be a major re-design to avoid impacting on this site.

#### **Grave of Elinor Magee and Child**

In December, 1980 the Grave of Elinor Magee and her Child was listed on the National Trust Register. The grave is situated directly to the east of the railway line at Camellia. Elinor Magee and her child were drowned in the Parramatta River in a boating accident in 1793. This grave is one of the oldest single graves in Australia and needs to be protected from any possible impacts from the construction of the Parramatta Light Rail.

#### **Camellia Sewage Pumping Station SPS 67**

This 1931 Sewage Pumping Station was listed on the National Trust Register in 1910. It was the means of ending what otherwise would have been the irretrievable pollution of the upper reaches of the Parramatta River. It is one of the largest raw sewage pumping stations in the Sydney Water Corporation System. The Pumping Station was listed on the State Heritage Register in November 2002. The construction of the Pumping Station and the Northern Suburbs Ocean Outfall Sewer to Dundas helped pave the way for the continued growth of Parramatta, Auburn and surrounding region. The Pumping Station must not be adversely impacted by the development of the Parramatta Light Rail.

#### **Camellia (Parramatta River) Underbridge Abutments**

The Camellia Railway Underbridge Abutments were listed on the National Trust Register in October, 1995. At each end of the 1901 last iron lattice truss railway bridge built in New South Wales are the fine detail red brick and sandstone abutments with arched substructures and brick balustrading. The bridge was an excellent example of a classic 19<sup>th</sup> century bridge in the English railway design tradition and may have been designed and fabricated in England. The iron truss was demolished in 1995 but the abutments survive. There is no proper justification in the Environmental Impact Statement for the demolition of the abutments and the National Trust strongly opposes their demolition.

#### **Female Orphan School Precinct, Rydalmere**

The Female Orphan School Precinct, Rydalmere was listed on the National Trust Register in June, 1975. The author of the Listing Report was James Semple Kerr. The main building is Georgian Beo Palladian plan of brick with stone quoins, constructed in 1814. The Precinct was listed on the State Heritage Register in April 1999 following an earlier Permanent Conservation Order placed in 1997.



The Trust is concerned to read in the Statement that two compounds are proposed for construction in the precinct. These compounds should be relocated outside of the boundaries of the heritage-listed precinct.

Repeatedly the Environmental Impact Assessment fails to properly recognise and deal with the major environmental and heritage impacts of this development proposal. The National Trust can only object to this proposal in its current configuration.

Yours sincerely

Graham Quint  
Director, Advocacy