



Brendon Roberts
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By email: emily.dickson@planning.nsw.gov.au

Dear Mr Roberts

Parramatta Leagues Club Hotel (SSD 8800) - 1 Eels Place, Parramatta, Notice of Exhibition

I refer to your email received 14 January 2019 inviting the Heritage Council of NSW (Heritage Council) to comment on the above development proposal.

It is understood that this proposal involves the construction of a hotel to the south of the existing Parramatta Leagues Club building comprising of:

- a 17 storey hotel with 209 rooms
- one basement level for services
- ancillary uses including a pool, gym, café, bars and function room
- vehicular access from O'Connell Street
- public domain works and tree removal.

The site is not within the curtilage of any State Heritage Register (SHR) items. However, it is in the immediate vicinity of four SHR items:

- Parramatta Park and Old Government House (SHR 00596);
- Roseneath Cottage (SHR 00042);
- Norma Parker Correctional Centre (SHR 00811); and,
- Cumberland District Hospital Group (SHR 00820).

The site also shares boundaries with two Nationally listed heritage sites.

- The 'Parramatta Female Factory and Institutions Precinct' (Place ID 106234); and,
- 'Old Government House and the Government Domain – Parramatta' (Place ID 105957).

In addition, the site is adjacent to the World Heritage listed 'Australian Convict Sites, Old Government House and Domain, Parramatta New South Wales' (Listed 31 July 2010, Site Reference Number: 1306). It is located within the Highly Sensitive Area identified under the Conservation Agreement for the protection and conservation of the World and National Heritage Values of this world heritage site. It should also be noted that the 'Parramatta Female

Factory and Institutions Precinct' has heritage values which may meet the criteria for World Heritage nomination and that there is strong and ongoing community and professional support for World Heritage nomination of this site.

As delegate of the Heritage Council of NSW, I provide the following comments:

Visual Impacts: The Heritage Council does not support the height of the proposed high-rise tower.

- The height of the tower is visually dominant and would introduce a prominent new feature to the skyline of North Parramatta if it proceeds in its current form. The height and scale of the proposal will significantly alter the character and skyline of this significant heritage precinct. It will have direct visual impacts on the above-mentioned items of State, National and World heritage significance. The proposal would interrupt views from the ridgeline and Crescent in Parramatta Park to the Hills District.

The Statement of Heritage and Visual Impact (SHaVI) prepared by Purcell (November 2018) concludes that the proposal does not present a significant impact on the views to, from and between the adjacent significant heritage items, nor that it has no significant impact on their heritage values. The Heritage Council does not agree with the conclusions of the proponent's assessment. We recommend that this assessment be peer reviewed by an independent heritage expert.

- Following the National Heritage Listing of the 'Parramatta Female Factory and Institutions Precinct' in 2017, the Heritage Council understands the proposed UrbanGrowth NSW towers referred to in the SHaVI will not proceed and therefore should not have been included in the SHaVI.
- The Heritage Council has consistently expressed concerns about the impact of developments within the Highly Sensitive Area and World Heritage Buffer Zone for Old Government House and Domain. The Heritage Council has also previously advised Parramatta City Council against increasing the heights and floor space ratio in the vicinity of the Old Government House and Domain due to the impacts of high-rise development on the World, National and State heritage values.
- For these reasons the Heritage Council recommends that the high-rise tower component of the current proposal be limited to a maximum height equal to the adjacent new Western Sydney Stadium. The stadium already represents an adverse incursion into the character and skyline of this significant heritage precinct. Given the stadium is already extant, it is recommended that this new development be limited in height to minimise additional adverse heritage impacts and to integrate the proposed new building with the surrounding area.

Historical Archaeological Impacts: The application has not demonstrated compliance with the SEARs for historical archaeology as currently proposed. It cannot currently demonstrate that archaeological resources of State significance would not be disturbed by the proposed design without archaeological testing which did not take place during the EIS preparation. It is recommended that archaeological testing is undertaken immediately and as a matter of urgency to further inform the proposal and quantify its potential impacts.

The application was supported by an historical archaeological assessment prepared by Austral Archaeology dated November 2018. The SEARs required this assessment to address certain site-specific requirements, most notably:

- *'recent archaeological assessments and results from archaeological testing undertaken for the study area and in the adjoining Norma Parker Correctional Centre (SHR 811) and the Cumberland District Hospital Group (SHR 820)' and*
- *'opportunities for avoidance through careful consideration of redesign where state significant archaeological resources are identified' and*
- *'consideration and address the results of the recent historical archaeological test excavation undertaken in the Parramatta North Urban Transformation site included*

evidence of the former state significant mill races which may extend into the subject site'.

To this end, the Austral assessment reviewed data from archaeological investigations of the Leagues Club site undertaken by GML Heritage in 2015. That investigation involved a low impact 'push tube' investigation approach for the redevelopment of the site to reduce ground disturbance, rather than a traditional or wider archaeological 'testing' approach. The results of bore log review from that program identified a level of 'fill' and disturbance may be present at the site, but no detailed testing occurred in the phase of site investigation. The assessment has recommended a program of archaeological testing in an area of the Leagues Club to confirm whether their prediction that the 'Mud Lodge' would survive and require archaeological management. Remains associated with this site are identified as being of State significance. If found to survive, Austral has recommended that testing would be followed by salvage to achieve the design proposed.

The Heritage Council notes that archaeological testing to confirm whether the predictions of the assessment are correct, could have occurred during the preparation of the EIS as indicated under section 4.41 (3) of the *Environmental Planning and Assessment Act 1979*. The current assessment has therefore not resolved whether the Leagues Club development would disturb and remove evidence of State significant archaeology, or to enable the EIS and Applicant to respond with alternative options for example redesign, to avoid this State significant archaeology if it is present at the site.

As noted above, to resolve this outstanding question the Applicant should undertake an archaeological testing program to inform the EIS for this proposed development. The results from this program should inform an updated archaeological assessment to provide a clear picture of the archaeology and to comply with the requirements of the SEARS and address the appropriate future management of the resource. This information should be supplied at the Response to Submissions stage of this SSD, assuming the other aspects of this proposal have been satisfactorily addressed through significant redesign as indicated above.

If you have any further enquiries regarding this matter, please contact Verena Mauldon, Senior Heritage Assessment Officer at the Heritage Division, Office of Environment and Heritage, on (02) 9873 8520 or verena.mauldon@environment.nsw.gov.au.

Yours sincerely



Tim Smith OAM
Director Heritage Operations
Heritage Division
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As Delegate of the Heritage Council of NSW
22 February 2019