



Our ref: DOC20/780334

David Koppers  
Planning, Industry and Environment  
Locked Bag 5022,  
Parramatta NSW 2124

By email: David.Koppers@planning.nsw.gov.au

Dear Mr Koppers

**Notice of Exhibition of application for Central Sydney Industrial Estate and Downer Sustainable Road Products Complex (SSD 10459)**

Thank you for your referral dated 22 September 2020 inviting comments from the Heritage Council of NSW on the above State Significant Development (SSD) proposal. The proposed development involves the staged subdivision of the Central Sydney Industrial Estate (the Western Area of the former Shell Oil Refinery, Clyde). Stage 1 would be developed as the Downer Sustainable Road Resource Centre.

The following document was considered in our assessment:

- *Central Sydney Industrial Estate incorporating the Sustainable Road Resource Centre, Environmental Impact Statement*, Element Environment, 18 September 2020

The proposed SSD is in the Parramatta Archaeological Management Unit (AMU) 2966, which is listed under the *Parramatta Historical and Archaeological Landscape Management Study* (PHALMS 2000) The AMU comprises the former Clyde Refinery including associated infrastructure. Due to the degree of ground disturbance, the PHALMS (2000) assessed that the AMU is of no archaeological potential.

The EIS for the proposed SSD also references the 2019 *Viva Energy Clyde Western Area Remediation Project, Environmental Impact Statement* by AECOM, which identified the Clyde Terminal as having State heritage significance for demonstrating NSW's increasing use of and reliance on fossil fuels. The EIS however, noted that the Clyde Terminal would not have potential for significant archaeological relics.

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

- the proposed SSD is within an area assessed as part of a remediation project in 2019. The EIS for that project identified the Western Area to be of State heritage significance. The significance assessment is not included in the supporting documentation; however, it is noted that the area is not listed on the SHR or Parramatta Local Environmental Plan (LEP) 2011.
- there is little to no potential for archaeological relics as stated in the EIS for the proposed SSD. No further archaeological assessment is required.

- If DPIE approves the proposal an Unexpected Finds condition could be imposed, reminding the proponent that S146 of the NSW Heritage Act, 1977, requires that if 'relics' are found that the Heritage Council of NSW must be notified.

If you have any questions regarding the above advice, please contact Georgia Wright, Senior Historical Archaeology Officer at Heritage NSW on 02 9995 6298 or [Georgia.Wright@environment.nsw.gov.au](mailto:Georgia.Wright@environment.nsw.gov.au).

Yours sincerely



14 October 2020

**Dr Siobhan Lavelle OAM**  
Senior Team Leader  
Specialist Services  
Heritage NSW  
Department of Premier and Cabinet  
**As Delegate of the Heritage Council of NSW**