

Andy Nixey
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By email: andy.nixey@planning.nsw.gov.au

Dear Mr Andy Nixey,

Notice of Exhibition of application for Telopea Concept Plan and Stage 1A (SSD-14378717)

Thank you for your referral dated 8/10/2021 inviting comments from the Heritage Council of NSW on the above State Significant Development (SSD) proposal.

The proposed development involves:

- A mixed-use development including:
 - Approximately 4,700 dwellings, including a mix of social, affordable and market dwellings
 - Inclusion of a new retail precinct with a new supermarket, food and beverage, and specialty retail
 - Proposed childcare facility
 - Proposed combined library and community centre
 - Proposed combined Church, Residential Aged Care Facility (RACF) and Independent living unit's (ILU) facility
- Delivery of new public open space, including:
 - A new light rail plaza
 - Hill top park
 - Elyes pedestrian link
 - Open space associated with the proposed library
- Retention of existing significant trees
- Road and intersection upgrades
- Cycle way upgrades
- Upgrade of utility services

The following reports were considered in our assessment:

- *Telopea Concept Plan Area, Concept Plan and Stage 1A Built Form Environmental Impact Statement*, prepared by Urbis and dated July 2021 (Urbis 2021a);
- *Heritage Impact Statement, Telopea Urban Renewal Project*, prepared by Urbis and dated 9 July 2021 (Urbis 2021b).
- *Visual Impact Assessment, Telopea Concept Plan Area and Stage 1A*, prepared by Urbis and dated 18 July 2021 (Urbis 2021c).

The proposed SSD is located close to the State Heritage Register (SHR) item SHR Redstone (SHR no. 01795) located at 34 Adderton Rd., Telopea NSW. Redstone is of state significance as an outstandingly intact example of the small-scale domestic work of the architect Walter Burley Griffin. The intactness of Redstone's interiors, including its fixtures and fittings, is

extremely rare and of state significance. The garden, though not designed by Walter Burley Griffin, is a fine intact example of an interwar garden which contributes to the setting of the house.

The proposed development considered whether there would be a visual impact on the SHR item. HNSW notes the proposal states that it will involve a stepped building form which concentrates the density to the centre and north of the concept approval site, away from the SHR item (Urbis 2021a, p182). However, the Visual Assessment (Urbis 2021c,p6) indicates the heights in the Concept Plan Core will be greater in the west than in the east, which is contrary to advice in the EIS (Urbis 2021a, p,3). HNSW supports an approach where the higher density is focused away from Redstone with a stepped approach to density, involving reduced scale and bulk applied on the western side of the concept approval stage 1A area. This approach would be consistent with the reasons argued by Urbis in the EIS (2021a, p182).

The proposed SSD is located in proximity to several locally significant items listed on the Parramatta LEP (2011) including the Kishnaghur Archaeological site (LEP item A6). This site has been listed for historical archaeological values for its associations with Captain Thomas Baylis, and for its archaeological research potential. However, no project impacts are anticipated to this item by the concept approval.

The Assessment has identified there is a potential historical archaeological resource which may contain 'relics' associated with the early-mid 19th century Adderton Estate. This site is located within the concept envelope and has not been adequately assessed and addressed by the HIS for the project.

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

- Heritage NSW notes that the preparation of an historical archaeological assessment is a SEARs requirement for this proposal to be triggered in case that historical archaeological potential is identified by the supporting Statement of Heritage Impact (SoHI; Urbis 2021b);
- Section 3 of the supporting SoHI, entitled "Preliminary Historical Archaeological Assessment" identifies moderate archaeological potential for an historical archaeological resource of potential State significance to be retained within the subject site (Urbis 2021b, p. 31-33);
- Section 6 of the supporting SoHI states that *"Further research is required to ascertain the likelihood for those remains to be retained in situ and to conclusively determine the significance of potential archaeological resources."* (Urbis 2021b, p. 58);
- Heritage NSW notes that an historical archaeological assessment as per the SEARs requirements has not been prepared to inform this EIS, however section 6.10 of the EIS, entitled "Heritage" states that *"Prior to the commencement of ground disturbance works at the site, a detailed Historical Archaeological Impact Assessment (HAIA) [sic] should be prepared to assess and mitigate impact to archaeologically significant relics."* (Urbis 2021a, p. 183)

In view of the comments above the following recommendations are made:

- The HIS has identified there is an anticipated historical archaeological resource of significance associated with the former Adderton Estate within the concept approval area. However, the HIS has only provided a preliminary archaeological assessment, which does not comply with the issued SEARs.
- HNSW advises DPIE that for the project to comply with the issued SEARS and to fully assess and understand the proposed impacts of the concept level approval, an

historical archaeological assessment should be prepared by a suitably qualified archaeologist in accordance with the guidelines *Archaeological Assessment* (1996) and *Assessing Significance for Historical Archaeological Sites and Relics* (2009). This assessment should identify what relics, if any, are likely to be present, assess their significance and consider the impacts from the proposal on this potential archaeological resource.

- HNSW notes that an archaeological testing program may be appropriate to confirm survivability and significance of the archaeological resource and inform the assessment.
- Where harm is likely to occur, it is recommended that the significance of the relics be considered in determining an appropriate mitigation strategy. If harm cannot be avoided in whole or part, an appropriate Research Design and Excavation Methodology should also be prepared to guide any proposed excavations or salvage programme.

The results of the archaeological assessment should be re-considered by the HIS for the project and include advice on avoidance as part of the detailed design, according to significance of the resource, where relevant.

As the site contains local heritage items, and other local items are in the vicinity, advice should be sought from the relevant local council.

If you have any questions regarding the above advice, please contact Dr Dragomir Garbov, Senior Maritime Archaeology Officer at Heritage NSW on (02) 9995 6066 or Dragomir.Garbov@environment.nsw.gov.au.

Yours sincerely

F. Barry

Felicity Barry, 8 November 2021
Acting Senior Team Leader, Specialist Services
Heritage NSW
Department of Premier and Cabinet
As Delegate of the Heritage Council of NSW
Click or tap to enter a date.