

Ms Jennie Yuan
Department of Planning Industry and Environment
P.O. Box 5022
PARRAMATTA NSW 2124

By email: Jennie.Yuan@planning.nsw.gov.au.

Dear Ms Yuan

Notice of Exhibition of application for Sydney Metro West Concept and Stage 1 Application - SSI project SSI 10038

Thank you for your referral dated 30 April 2020 inviting comments from the Heritage Council of NSW on the above State Significant Infrastructure (SSI) proposal.

The proposed development involves:

- Concept and stage 1 approval of the Metro West for all major civil construction works between Westmead and the Bays including station excavation and tunneling. The following stages would include two more stations (Pyrmont and Rydalmere and CBD station)
- Construction and operation of about 24 kilometers (twin tunnels) of underground metro rail between Westmead and the Sydney CBD.
- New metro stations at Westmead, Parramatta, Sydney Olympic park, North Strathfield, Burwood north, five dock, the bays and Sydney CBD. The CBD station to be determined following additional investigation and additional stations at Pyrmont and Rydalmere are also under investigation.
- Pedestrian links and to other transport modes and surrounding land uses
- Modification of existing suburban stations and rail infrastructure at Westmead and Nth Strathfield
- Services in each metro station
- Stabling and maintenance facility at Clyde with connections (above and below ground) to connect to mainline tunnels and other operational ancillary infrastructure
- Services facilities at Rosehill (in Clyde stabling and maintenance facility) Silverwater and between five dock and the bays for air ventilation and emergency evacuation
- Alterations to pedestrian and traffic arrangements, cycling, public transport infrastructure around metro stations
- Subdivision of station sites to support integrated station and precinct development and ancillary facilities
- Ancillary facilities to support construction

HNSW notes that the concept does not include amongst other things, test excavation, geotechnical or contamination investigations for the purposes of design or assessment of Sydney metro west.

As a concept approval it is unclear what the implications from this project would be for a proposed new station in the Sydney CBD, or the impacts from the proposed Rydalmere and Pyrmont stations where locations are not yet confirmed. As a staged approval it is noted that these aspects would be assessed in future stages, however, we recommend that DPIE should consider whether these are excluded for now and considered separately in future, based on an assessment of the project impacts and appropriate environmental and site specific assessment.

The following reports in addition to the main EIS were considered in our assessment:

- *Westmead to the Bays and Sydney CBD – Environmental Impact Statement Concept and Stage 1 Technical Paper 2 (in three parts): Noise and Vibration, prepared by SLR, dated September 2020.*
- *Westmead to the Bays and Sydney CBD – Environmental Impact Statement Concept and Stage 1 Technical Paper 3 Non-Aboriginal Heritage, prepared by Artefact Heritage Services dated April 2020*
- *Westmead to the Bays and Sydney CBD – Environmental Impact Statement Concept and Stage 1 Technical Paper 5: Landscape and Visual Assessment, prepared by IRIS Visual Planning + Design dated April 2020.*

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

The proposed SSI Concept and stage 1 would negatively impact two items listed on the State Heritage Register (SHR) – the White Bay Power Station, Rozelle and the Roxy, Parramatta.

The State Abattoirs, Sydney Olympic Park would also be impacted. The project would negatively impact ‘more than minor’ at least three items assessed as being of locally listed heritage items. However, HNSW notes that more listed heritage items are discussed throughout the Tech Paper as having impact as a result of the project (e.g. the convict barrel drain in Parramatta). The analysis of impact to listed items may not be a correct reflection of the project’s full environmental impact and should be clarified. The project would also impact two areas of identified historical archaeological potential. The first in Parramatta of State significance, linked to the early colonial occupation of the Colonial Town. The second, assessed as locally significant at The Bays, involving early-late 19th century occupation.

The project’s impacts have considered visual, landscape, built and archaeological concerns. This letter will focus on project impacts to the State heritage listed and site/relics with historical archaeological significance, which would be impacted by the project. Please note that this letter does not comment on Aboriginal Cultural Heritage assessment or issues arising from this aspect of the project.

Future Over Station Development

HNSW notes that there are implications from future over-station development at Metro stations proposed to items of State, National and World Heritage values. HNSW raises the future consideration for limitations of heights, form, materiality and view impacts to Parramatta Park and Old Government House and potentially, the Sydney Opera House in particular. However, HNSW also raises this as a concern for White Bay Power Station and the Roxy Cinema for over-station development. Careful planning would be necessary to address these issues. The Landscape analysis in Tech Paper 5 raises the issues of the landscape characters and visual impacts, focused on the Concept and Stage 1 applications. It has not engaged with the future over station development limits although those may impact views from and to SHR listed places as noted above. This would need detailed consideration in future.

White Bay Power Station (WBPS) (SHR no. 01015, Victoria Road, Rozelle).

The item is significant as an industrial heritage item as the longest serving Sydney power station with representative machinery generation of electricity in the early and mid 20th century. The item is significant aesthetically and associatively. It is a rare example as the only surviving coal based situated industrial structure surviving adjacent to the harbour in the Sydney region. It contributed to the expansion of the economy of Sydney and NSW.

The project has assessed that it would have a moderate direct impact as a result of project curtilage encroachment, vibration, demolition and visual effects of the project.

Curtilage encroachment: The current curtilage was established to retain the visibility to and prominence of the WBPS as a harbourside landmark. The curtilage contributes to retaining its impressive scale and setting. The Conservation Management Plan (CMP) notes that WBPS should not be substantially obscured by any development on nearby sites. The project would require the construction zone to extend into the WBPS curtilage, which would adversely impact the setting and context of the WBPS and potentially diminish its overall massing, configuration and visibility. Further, the relocation of the Port Access Road into the curtilage will change the interpretation and understanding of the item. The project does not propose to mitigate this change.

*Heritage NSW **recommends** that the project should consider reducing the construction zone within the SHR curtilage, in particular along the construction boundary adjacent to the Boiler House.*

Vibration: There is potential for WBPS to experience vibration levels above the cosmetic damage screening criteria. Damage to significant WBPS buildings and structures due to construction vibration would be unacceptable. Technical paper 3 recommends a structural assessment is undertaken at the start of works with vibration monitoring during the project. Additional management measures would need to be implemented to ensure damage to buildings and structures are avoided/mitigated during or at the end of the project. Further details should be provided to confirm the avoidance/mitigation measures for the project. HNSW recommends the application of the 7.5mm per second peak particle velocity limit be applied to measuring vibration impacts for all heritage items including the WBPS for consistency.

Acoustic Sheds: Two (2) 15m high acoustic sheds will be constructed to the east of the WBPS for the duration of the construction period. Due to their proposed height and placement (particularly alongside the Boiler House) will have an adverse visual impact on an important identified view of the WBPS by diminishing its impressive scale. It is unclear if both sheds will be constructed at the same time. Consideration should be given to reducing the height of the sheds and their placement should be carefully positioned to ensure visual impacts to the setting of the WBPS are minimised.

Demolition: The document notes that several non-significant structures within the WBPS curtilage would be demolished. It is unclear which items and how significant these structures are. The Heritage Act 1977 sets strict requirements for demolition of items within an SHR curtilage which is a controlled activity. Further clarification should be provided to confirm the significance and location of these structures and the justification for the demolition. The Figures in Tech Paper 3 do not clearly show the location of the WBPS related to the Bays Metro station construction layout, this should be rectified to include the SHR curtilage and designated a heritage item (Ref Artefact 2020, Figure 19, p39).

Unlisted item - Former warehouse shed, Glebe Island: Tech Paper 3 notes that the former warehouse shed at Glebe Island is the last remaining part of a warehouse building that originally extended north-east along the north-western edge of Glebe Island. The shed is a representative example of this type of structure in this environment. Consideration should be given to retaining the shed in its current location. It appears the structure could reasonably be retained without impacting the construction envelope.

Roxy Theatre (SHR No 00711, 65-69 George Street, Parramatta). The Roxy's statement of significance identifies it is an excellent example of an Interwar Spanish Mission style building both individually and in quality architectural design. The significance as a theatre is also reflected in the size and architectural character of the building with its location and origins in Parramatta relating to the growth of Sydney's suburbs in the interwar period.

HNSW notes that the Roxy is outside the Construction zone for the Parramatta Metro Station but it would be immediately adjacent this zone. Tech Paper 3 (Table 71, p241) advises vibration and settlement are anticipated to be the main impacts from the project along with a change in the immediate setting to the item. HNSW recommends the setting could be improved by confirmed height limitations for the metro station in direct proximity to the Roxy.

The project anticipates there will be a level of settlement from the project at 25mm with a Risk level of 2 (involving superficial damage). Further details of how the project proposes to manage this impact to the Roxy is requested at RTS stage. This may require commitments for earlier condition assessment, monitoring during the project, and commitments about rectification at the end of the program.

Such commitments should be made for both the Roxy and WBPS and for all heritage items within the study area and immediately adjacent during the Stage 1 works. HNSW notes as that Technical Paper 2 gives commitments in NV16 and NV17 for condition surveys and vibration monitoring where appropriate (SLR 2020, Table 97, p258). It does not state that rectification works to respond to any damage from the project in line with the earlier condition survey, would take place. This requires clarification and further commitment by Sydney Metro at RTS.

Historical Archaeology

The project has the potential to fully remove all archaeological evidence of State and local heritage significance for the Parramatta Metro station and locally significant archaeology for the Bays Metro station. HNSW notes the avoidance of sites 'Kia Ora' and the Archaeological site known as the 'Horse Parapet Façade' item from the construction zone of the Parramatta Metro Station and supports this action.

Parramatta Metro Station:

Issues with level of underpinning research:

HNSW concurs that the analysis underpinning the current EIS is not based on adequate site specific research consistent with an historical archaeological assessment. Further site specific research is warranted to underpin development of an appropriate archaeological mitigation strategy. This is particularly the case for State significant archaeology of the earlier Colonial-era occupation in Parramatta.

Analysis in Technical Paper 3 is high level only with a heavy reliance on secondary source material and historic plans. For Parramatta metro station it relies on the Parramatta Historical

Archaeological Landscape System (PHALMS) which dates to 2000, although much of the potential has been known since 1991. Technical Paper 3 acknowledges that the PHALMS listings are applied as a guide for archaeological research and are not 'binding determinations on archaeological potential and significance for the Parramatta area' (Artefact 2020, p243). Technical Paper 3 also acknowledges a detailed analysis of services, basements and sites was not possible for the Parramatta Metro Archaeological Assessment (Artefact 2020, p 252). Some of the analysis of PHALMS been reviewed and updated upon further site-specific research. So PHALMS, as an overview is a GUIDE only, not a final assessment. HNSW has raised the need for specific site assessment in prior EIS work by the same consultant team.

The research for the assessment has adequately investigated previous archaeological assessments relevant to the Parramatta Metro station site. This includes works within 3 Horwood Place (AMU 3177), Parramatta and at 25 Smith Street, Parramatta and Macquarie Lane (containing in situ evidence of the Convict Barrel Drain) (AMU 3178). It has perhaps misunderstood the survivability of the resource from 1996 excavation of 41-53 George Street, Parramatta (in AMU 2873). HNSW understands that a convict hut was retained within the 1996 redevelopment, and not all remains were salvaged. HNSW further understands that there is greater potential for survivability under part of 'Parramall'. The Assessment, in an overview historical analysis has failed to identify the potential for the mid-19th century Ritchie Parramatta Iron works, which existed in the study area and was a significant industrial enterprise in the Parramatta area (likely within AMU 3075). HNSW notes an assessment of neighbouring allotments 220-230 Church Street, Parramatta (in AMU 3075) has also taken place to inform a development application and will partly be included in the proposed construction zone. Excavation at 236 Church Street also revealed intact archaeological deposits.

Convict Barrel Drain impacts:

Within the Metro station boundary, the remains of the Convict Barrel Drain (1820s) locally listed item survives. The proposal is likely to remove any surviving sections of this drain in the construction zone. This item has been known since the 1980s and is identified in the Parramatta LEP. However, its successive removal has led to less of this surviving significant structure remaining intact. Its management should aim to avoid the fragment surviving in Macquarie Lane and within the study area. Recently approved archaeological investigation is proposed by Casey and Lowe Pty Ltd and is relevant to part of the Metro study area. This aims to avoid the item, where found. HNSW therefore requests further advice on how the project would manage the retained and conserved in-situ remains of the Barrel drain for the Metro.

Comparative analysis applied for archaeological analysis:

Comparative analysis undertaken by Artefact (2020, p277) fails to note that the SSI/SSD process does not usually follow management protocols for items listed on the SHR. It usually salvages state significant archaeology if it is present. The protection mechanism of SHR listing or local listing is therefore not a protection mechanism for archeology in the circumstances of an SSI project. The proposed management of the resource identifies convict occupation evidence as low within the study area but did not recommend monitoring.

HNSW suggests that the potential may be higher and concurs with Artefact's recommendation (2020, p278), that monitoring is inappropriate to identify and manage the anticipated late 18th century/early 19th century occupation. A combined archaeological approach which to record and manage Aboriginal and historical archaeological evidence (potentially also in a post contact phasing) is recommended by Artefact (2020, p278) and supported by HNSW.

Proposed Management:

The program identifies there may be a need to consider in situ retention of State significant archaeology and a modification of design. This is consistent with established Heritage Council of NSW Policies for managing state significant archaeology. However, HNSW notes that early and often ephemeral and fragmentary occupation evidence dating from the late 18th and early 19th century in Parramatta would not often survive well once excavated. It may not be practical for in situ retention. The recent interpretation of the remains at 45 Macquarie Street, Parramatta are an exception to the rule, due to the presence of rare and early structural remains.

An archaeological resource is often better retained unexcavated and conserved such as at Parramatta Justice Precinct. Therefore, if the project is to be approved in this location with the impact anticipated on Colonial-era remains, HNSW recommends the preferred strategy may involve a clear project commitment from Sydney Metro to a full archaeological open area salvage program. Provided the program is conducted to the highest standard of archaeological recording, well-resourced in preparation, during excavation and in post excavation analysis and reporting. Ultimately it should be conducted and guided by a suitably qualified and experienced historical archaeological team. In the rare circumstances where such approvals are considered, the Heritage Council of NSW would include additional conditions including interpretation of the results, public open days and the preparation of a publication at the end of the program based on the final excavation report.

The Bays Metro Station:

The Archaeological potential identified within the Bays Metro station is focused on the White Bay Hotel which was constructed in the 1850s/1860s. This building was demolished in 2010 following a fire which damaged the building. HNSW is however unclear why, if the building was considered not sufficiently significant to be retained although the correlation between this hotel and the White Bay Power station is noted. It is however unclear how its archaeological resource would now warrant detailed investigation and management by the project or what new information would be revealed. HNSW requests that the proponent provide more evidence to justify the archaeological approach being proposed.

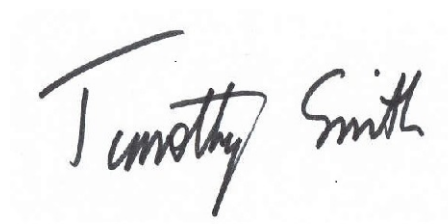
Local Heritage items:

The Project will affect other local heritage items and identifies several 'potential' heritage items, identified without a statutory register. HNSW notes that while the management for local heritage items is dealt with by the relevant Councils, we support efforts to ensure appropriate management of vibration impacts by the project to these items (both listed and not listed) to reduce the impact of the project on items of local heritage significance. HNSW notes that Tech Paper 2 (SLR: 2020, p40) commits Sydney Metro West to condition surveys of potentially affected buildings and structures near tunnels and excavations prior to commencement (NV16 and NV17, SLR 2020, Table 97, p258). The standard of 2.5mm/s Peak Particle Velocity (PPV) from DIN 4150 may be considered. HNSW reiterates a consistent standard for measuring vibration impact to heritage items should be adopted by Sydney Metro. While Tech Paper 2 (SLR 2020, p42) argues that unless buildings are structurally unsound the measure should not matter, HNSW recommends the measure of 2.5mm/s PPV (DIN 4150) is applied for consistency. It is unclear how works would be rectified if issues are identified as a result of vibrations from the project. HNSW recommends this is clarified by a further project commitment at RTS stage.

HNSW recommends the project provide greater clarify around the points raised above, particularly regarding the items in this letter. Draft conditions may be possible once these points are clarified, following RTS stage.

If you have any questions regarding the above advice, please contact Felicity Barry, Senior Historical Archaeologist at Heritage NSW on (02) 9995 6914 or Felicity.Barry@environment.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink that reads "Timothy Smith". The signature is written in a cursive style with a large, sweeping initial 'T'.

Tim Smith, OAM
Director Operations
Heritage NSW
Department of Premier and Cabinet
As Delegate of the Heritage Council of NSW
3 July 2020