



Contact: Katrina Stankowski
Phone: (02) 9873 8569
Fax: (02) 9873 8550
Email: Katrina.Stankowski@heritage.nsw.gov.au
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Your Ref: SSD 5346, SSD 5347 & SSD5349

Ms Denise Robertson
Planner
Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Ms Robertson

RE: Heritage Council comment on Environmental Impact Statements for the North Penrith Defence Site Mixed Use Development – SSD 5349 (Stages 2B & 2C), SSD 5347 (Stage 2D) and SSD 5349 (Stage 3B).

The Heritage Council has received advice from the Office of Environment & Heritage that the Environmental Impact Statement's (EIS) for the above Major Projects are currently on exhibition and accordingly wishes to provide comment.

After reading the three Environmental Impact Statements, it would appear that the Concept Plan for this Major Project was approved in November 2011 under Part 3A of the EP&A Act concurrently with Stage 1 of the project which is currently under construction.

The above three EIS documents cover works relating to the remaining stages of the project which comprise:

- Preparation works, including trees/shrub removal, topsoil stripping and stockpiling for later reuse and the disposal of unsuitable topsoil material, and taking up and stockpiling existing concrete and asphalt hardstands and roads for later reuse in other stages of the construction works;
- Bulk earthworks comprising lot formation, construction of the water cycle and drainage system including a central waterway and detention basin;
- Subdivision to create 44 standard residential lots, 5 integrated lots, 2 apartment super-lots yielding 60 apartments, 2 open space lots and 1 industrial lot;
- Open space construction including the 'Water's Edge' and 'Wetland Park'/The Common public domain landscaping, pedestrian/cycle bridge over the water feature and public art;
- Traffic & access arrangements comprising internal road network and streetscapes, construction of the two road connections to the Penrith Station commuter car park, re-construction of the entry road from Coreen Ave to the commuter car park, construction of the entry road from Castlereagh Road into the Stage 2B and 2C site including intersection upgrade, utilities servicing infrastructure- electrical, sewerage, telecommunications, potable water and gas and the erection of informative signage at different road entries to the wider site.

Comments will be provided on each SSD individually.

SSD 5346 (Stages 2B and 2C).

1. The Director General's Environmental Assessment Requirements (EARs) for this SSD regarding heritage require that a statement of significance and an assessment of the impact on the heritage significance of any heritage items and/or conservation areas, including Thornton Hall and Combewood House, should be undertaken in accordance with the guidelines in the NSW Heritage Manual. It is also stated under 'Plans and Documents' in the EARs that the EIS must include a Heritage Interpretation Study.
2. Table 5 of the EIS for SSD 5346 states that the information regarding Thornton Hall and Combewood is contained in Sections 2.3, Section 6.4, Appendix K and Appendix L. However Table 7 on page 38 of SSD 5346 EIS states that "Thornton Hall is outside the scope of the Stages 2B and 2C site". Based on that information it would appear that the requirements regarding Thornton Hall in the EARs for SSD 5346 have not been met. This EIS should be amended with the required information regarding Thornton Hall and be subject to review **prior to approval of this project by the Department of Planning & Infrastructure.**

3. The EIS for SSD 5346 indicates that Stages 2B and 2C may have minor visual impacts on The Museum of Fire and the locally significant two storey Federation Queen Anne residence known as 'Combewood'. These items are located outside (but adjacent to the site's boundaries) and the EIS outlines that curtilages for both will be enforced as recommended in the approved Concept Report.

In addition, as Combewood was part of a much larger estate the potential for archaeological remains related to Combewood's former outbuildings and associated structures within the project boundaries remain.

Historical archaeological testing indicates that the remains of the former stables for Combewood are present on this site, but previous archaeological works by persons unknown over the years have removed any archaeological research potential this site may have. Two recommendations have been made regarding further management of this site (the remaining bricks should be offered to the owners of Combewood and their removal should be monitored by an archaeologist) and these are supported by the Heritage Council.

4. There is no Heritage Interpretation Study within the EIS despite its requirement as part of the EARs. A Heritage Interpretation Strategy prepared in October 2010 is referenced on page 9 of the EIS, but information from it is not included. Table 7 in Section 6.2 (page 38) of the EIS states that an Interpretation Strategy will be prepared in conjunction with a Public Art Strategy and will be submitted in conjunction with subsequent project applications. Table 7 also refers to Section 4.4 and Appendices J-L in regards to this Interpretation Strategy, however Section 4.4 only refers to the public art within the Landscaping and public domain. There is no mention of any heritage interpretation as part of this landscaping and public domain.
5. The lack of an updated Heritage Interpretation Study within the EIS for SSD 5346 would suggest that the Applicant has not adequately undertaken the EIS in this regard and that an updated Heritage Interpretation Study for the North Penrith Defence Site Mixed Use Development should be undertaken by an appropriately qualified interpretation specialist and be subject to review **prior to approval of this project by the Department of Planning & Infrastructure.**

SSD 5347 (Stage 2D) and SSD 5349 (Stage 3D).

1. There is no Heritage Interpretation Study within the EIS for SSDs 5347 and 5349 despite its requirement as part of the EARs for both projects. A Heritage Interpretation Strategy prepared as part of the Concept Plan approval is referenced in each the EIS documents, but information from it is not included. Both reports state that an Interpretation Strategy will be prepared in conjunction with a Public Art Strategy and will be submitted in conjunction with subsequent project applications.
2. The lack of an updated Heritage Interpretation Study within either EIS would suggest that the Applicant has not adequately undertaken the EIS in this regard and that an updated Heritage Interpretation Study for the North Penrith Defence Site Mixed Use Development should be undertaken by an appropriately qualified interpretation specialist and be subject to review **prior to approval of this project by the Department of Planning & Infrastructure.**

If you have any questions regarding the above advice, please contact Katrina Stankowski at Katrina.Stankowski@heritage.nsw.gov.au.

Yours sincerely



20/12/2012

Dr Siobhan Lavelle OAM

Acting Manager – Conservation Team
Heritage Branch
Office of Environment & Heritage
Department of Premier & Cabinet

As Delegate of the NSW Heritage Council