

PARRAMATTA LEAGUE'S CLUB HOTEL DEVELOPMENT
CLIENT - PARRAMATTA LEAGUE'S CLUB
STATEMENT OF HERITAGE AND VISUAL IMPACT
28 NOVEMBER 2018

PURCELL

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STATEMENT OF HERITAGE AND VISUAL ANALYSIS

CONTENTS

1.0 INTRODUCTION	04	ANNEXURES	25
1.1 Background	04	A - Australian Convict Sites Statement of Outstanding Universal Values	25
1.2 Brief	04	B - Old Government House and Domain National Heritage List - Summary Statement of Significance	25
1.3 Limitations	04	C - Ross Street Gatehouse - S.170 Heritage and Conservation Register Listing	25
		D - Roseneath Cottage - State Heritage Register Listing Extract	25
		E - Norma Park Correctional Centre	25
		F- Cumberland District Hospital Group - State Heritage Register Listing Extract	25
		G - Parramatta Correctional Centre	25
		H - Parramatta Female Factory and Institutions Precinct	25
2.0 METHODOLOGY	05		
2.1 Environmental Planning Instruments, Policies and Guidelines	05		
2.2 Reference Materials	05		
2.3 Terminology	05		
2.4 Site Visit	05		
2.5 Consultation	05		
2.6 Visual Impact Assessment	05		
3.0 THE SUBJECT TITLE, ITS CONTEXT & HERITAGE CONSIDERATIONS	06		
3.1 Location	06		
3.2 Heritage Context	07		
3.3 The Ross Street Gatehouse	09		
3.4 The Parramatta North Historic Sites	10		
3.5 Parramatta Female Factory and Institutions Precinct	10		
4.0 PARRAMATTA LEAGUE'S CLUB HOTEL DEVELOPMENT	10		
4.1 Location	10		
4.2 Overview of Development Proposal	10		
5.0 ASSESSMENT OF POTENTIAL HERITAGE IMPACT	11		
5.1 Preliminary Visual Impact Assessment	11		
5.2 Assessment against environmental planning instruments, policies and guidelines and best practice principles	21		
6.0 PRELIMINARY ASSESSMENT OF POTENTIAL HERITAGE IMPACT	24		
7.0 RECOMMENDATIONS AND CONCLUDING REMARKS	24		
7.1 Additional Studies and Reports	24		

STATEMENT OF HERITAGE AND VISUAL ANALYSIS

I INTRODUCTION

I.1 BACKGROUND

APP Corporation Pty Limited, acting on behalf of the Parramatta Leagues Club (PLC), have engaged Purcell to prepare a Heritage and Visual Impact Assessment (HVIA) for the proposed Parramatta Leagues Club Hotel development.

The PLC proposes, as part of a wider staged programme of redevelopment, an integrated hotel and aquatic centre, wellness and function centre located on the existing surface carpark site to the south of the PLC building.

The project has been deemed to be a State Significant Development, subject to the requirements of SEARs SSD 8800. The assessment of potential heritage impacts forms one aspect of the nominated consultation and assessment framework.

I.2 BRIEF

This HVIA is intended to establish an understanding of the potential impacts of the Hotel development on the World Heritage values of Parramatta Park and Old Government House and Domain (OGHD) under the EPBC Act and Regulation and associated statutory requirements.

The findings of the HVIA will inform the design resolution of the proposal and establish the required statutory approvals and requisite heritage documentation. In addition, the HVIA will form part of the statutory application made for the proposal at various levels of government.

I.3 LIMITATIONS

This preliminary assessment focuses on the potential impact of the development on the visual setting and context of the site and the adjacent items of World, National, State and Local heritage significance.

Wider Archaeological values and potential impacts (both Aboriginal and European) and Interpretation Strategies for the communication and enhancement of values and significance do not form part of this report and are being prepared by others. No assessment has been undertaken on the social values through community consultation, or other means, nor of the potential impacts to natural values.



View from Northern Access Road, existing (at left) and proposed (right) (Image courtesy of HASSELL)



View from O'Connell Street and Ross Street intersection, existing (at left) and proposed (right) (Image courtesy of HASSELL)



View from Northern Access Road, existing (at left) and proposed (right) (Image courtesy of HASSELL)

Physical model of Proposed PLC Hotel development (Image courtesy of HASSELL)

STATEMENT OF HERITAGE AND VISUAL ANALYSIS

2 METHODOLOGY

2.1 ENVIRONMENTAL PLANNING INSTRUMENTS, POLICIES AND GUIDELINES

This assessment has been prepared with reference to the following:

- *Environment Protection and Biodiversity Conservation Act 1999*
- *The Environmental Planning and Assessment Act 1979 and Regulation 2000*
- *Specific requirements of the Secretary's Environmental Assessment Requirements for SSD 8800*
- *Heritage Act 1977 (NSW)*
- *State Environmental Planning Policy (State & Regional Development) 2011*
- *State Environmental Planning Policy (Infrastructure) 2007*
- *Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005*
- *Parramatta Local Environmental Plan 2011*
- *Parramatta Development Plan 2011*
- *Conservation Agreement for the protection of Works and National Heritage values of the Australian Convict Sites, Old Government House and Domain, Parramatta*, including the Technical Report prepared by Planisphere, 2012
- *Parramatta Park Trust Act 2001*
- *Parramatta Park (Old Government House) Act 1967*

The specific requirements and controls of the above, relevant to the proposal, together with the conformance of the proposed design against these requirements is outlined within Section 5.

2.2 REFERENCE MATERIAL

The following non-statutory reference material has also been considered in the assessment of potential impacts:

- *Old Government House and Domain Management Plan 2008*
- *Parramatta Park Trust Conservation and Management Plan 2007*
- *Parramatta Park Trust Heritage Asset Management Strategy 2008*
- *Parramatta North Historic Sites Consolidated Management Plan*, prepared by TKD Architects, 2017
- *Statements of Heritage Impact*, NSW Heritage Manual, 2002
- *The Australia ICOMOS Burra Charter*, 2013

The specific requirements and controls of the above, relevant to the proposal, together with the conformance of the proposed design against these requirements is outlined within Section 5.

2.3 TERMINOLOGY

The assessment employs the terminology outlined within Article 1 of the Burra Charter: <http://australia.icomos.org/wp-content/uploads/The-Burra-Charter-2013-Adopted-31.10.2013.pdf>

2.4 SITE VISIT

This preliminary assessment has been informed by several site visits which have considered the significant views and vistas in context. These visits were undertaken on Monday 23 October and Friday 19 January 2018.

2.5 CONSULTATION

Consultation and engagement with the following stakeholders, identified within the SEARs for SSD 8800 was undertaken prior to the finalisation of this report and was based on the Preliminary Heritage and Visual Impact Assessment, 03 October 2018:

- Commonwealth Department of Environment and Energy
- City of Parramatta
- Government Architects Office (NSW) and Design Review Panel
- Office of Environment and Heritage (NSW)
- Parramatta Parks Trust.

2.6 VISUAL IMPACT ASSESSMENT

Preliminary consultation with the Commonwealth Department of Environment and Energy was undertaken in April and May 2018, following the self assessment process with reference the publication Matter of National Environmental Significance - Significant impact guidelines 1.1, Environment Protection and Biodiversity Conservation Act 1999.

The visual impact assessment has been prepared in accordance with the SEARs requirements for SSD 8800. These requirements stipulate that the ‘... assessment, including focal lengths, must be done in accordance with Land and Environment Court principles.’⁰¹

The NSW Land and Environment Court (LEC) Planning Principle for *Impact on the public domain views*, established in case law outlines the following principles for ‘...determining the acceptability of the impact on views from the public domain...’⁰² as a two-staged process, factual followed by analytical. For the purpose of this visual impact assessment the Conservation Agreement Technical Report, prepared by Planisphere, 2012, is employed as the basis of the factual assessment of potential visual impacts to Parramatta Park and OGH. The analytical assessment considers the NSW LEC Principles impact on public domain views, and employs the NSW LEC *Photomontage Policy*⁰³ which stipulates the following requirements:

Requirements for photomontages

1. Any photomontage proposed to be relied on in an expert report or as demonstrating an expert opinion as an accurate depiction of some intended future change to the present physical position concerning an identified location is to be accompanied by:

Existing Photograph

- a) A photograph showing the current, unchanged view of the location depicted in the photomontage from the same viewing point as that of the photomontage (the existing photograph);
- b) A copy of the existing photograph with the wire frame lines depicted so as to demonstrate the data from which the photomontage has been constructed. The wire frame overlay represents the existing surveyed elements which correspond with the same elements in the existing photograph; and
- c) A 2D plan showing the location of the camera and target point that corresponds to the same location the existing photograph was taken.

Survey data

- d) Confirmation that accurate 2D/3D survey data has been used to prepare the Photomontages. This is to include confirmation that survey data was used:
 - i. for depiction of existing buildings or existing elements as shown in the wire frame; and
 - ii. to establish an accurate camera location and RL of the camera.
2. Any expert statement or other document demonstrating an expert opinion that proposes to rely on a photomontage is to include details of:
 - a) The name and qualifications of the surveyor who prepared the survey information from which the underlying data for the wire frame from which the photomontage was derived was obtained; and
 - b) The camera type and field of view of the lens used for the purpose of the photograph in (1)(a) from which the photomontage has been derived.

In response to Policy Item 2 the following details are provided:

- a) The survey information from the underlying data used in the wire frame for photomontages was prepared by Guy Wilkinson BBS (Property) and Cert IV Photoimaging together with HASSELL; and
- b) The camera type used was a digital SLR with 35mm equivalent sensor. The model was Canon EOS 5d Mark IV. Two lenses were used, with various focal lengths, a Canon 16-35mm F4 IS L lens and a Canon 24-105mm F4 IS L lens.

⁰¹ SEARs SSD 8800, p.8

⁰² <https://www.caselaw.nsw.gov.au/decision/54a639903004de94513da747>

⁰³ http://www.lec.justice.nsw.gov.au/Pages/practice_procedure/policies.aspx

STATEMENT OF HERITAGE AND VISUAL ANALYSIS

3 THE SUBJECT TITLE, ITS CONTEXT & HERITAGE CONSIDERATIONS

3.1 LOCATION

The subject site is identified as Lot 369 DP 752058, Lot 7054 DP 1074335, Residual Crown Plan 80-300 (Sydney), forming part of the Crown Lands of Parramatta Park. It is referred to as 1 Parramatta Park Land, 1 Eels Place and 17-19 O'Connell Street, Parramatta.⁰⁴

The site is owned by Parramatta Park Trust under lease by the Parramatta Leagues Club and Venues NSW.

It is to the south of the current Parramatta Leagues Club building and north of Parramatta Stadium (undergoing redevelopment) and currently contains at grade parking on a bitumen surface, trees and services. The site is owned by Parramatta Park Trust and is under an exclusive lease by Parramatta Leagues Club. The site of the building and public domain work has an area of approximately 3,500sqm.



Ross Street Gatehouse - Eastern Elevation (source: Purcell)



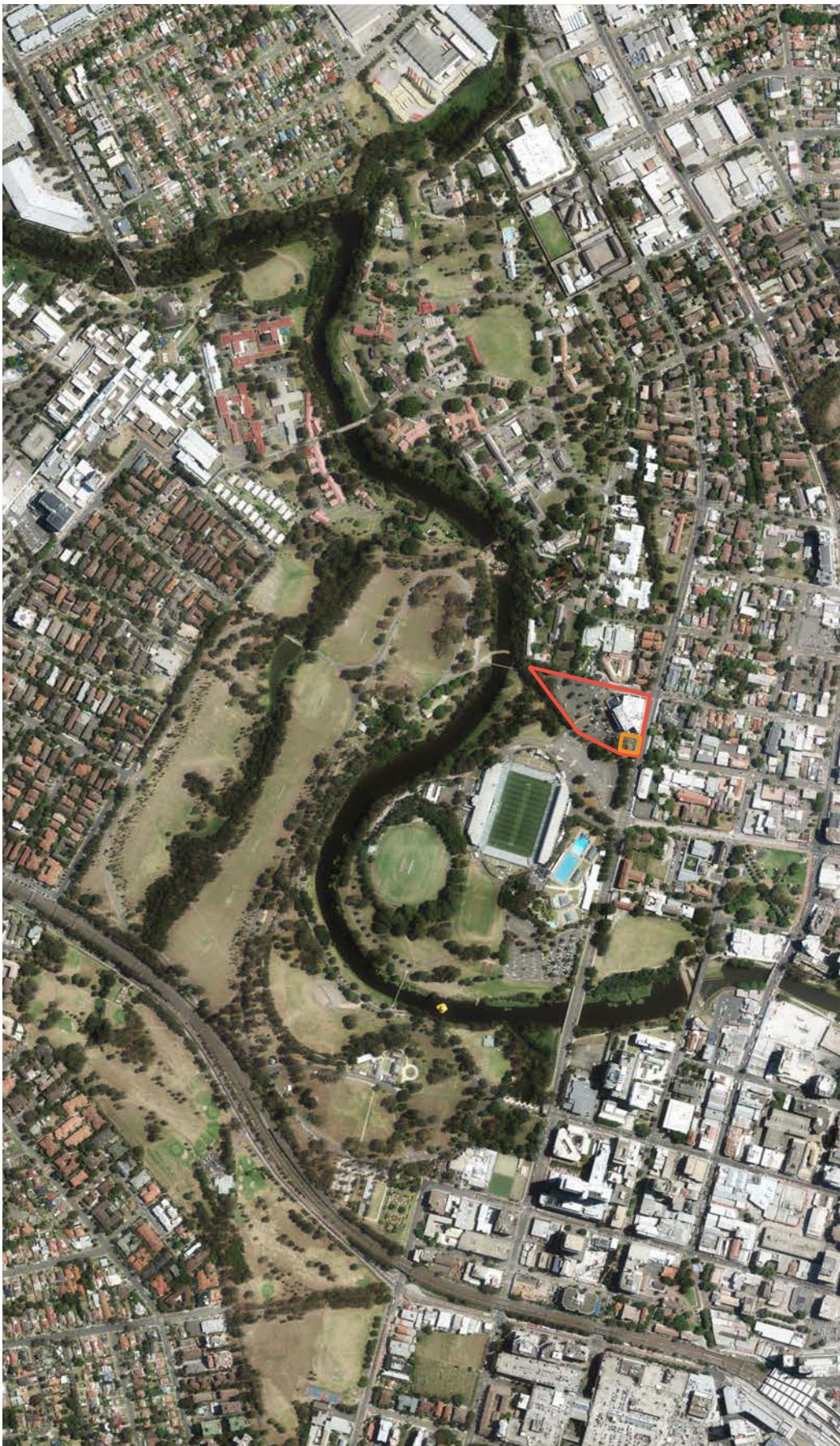
Parramatta League's Club and Ross Street Gatehouse (source: Purcell)



Parramatta League's Club (source: Purcell)



Ross Street Gatehouse - Southern Elevation (source: Purcell)



- Legend**
- Ross Street Gatehouse
 - PPT s.170 Heritage and Conservation Register
 - Parramatta Leagues Club

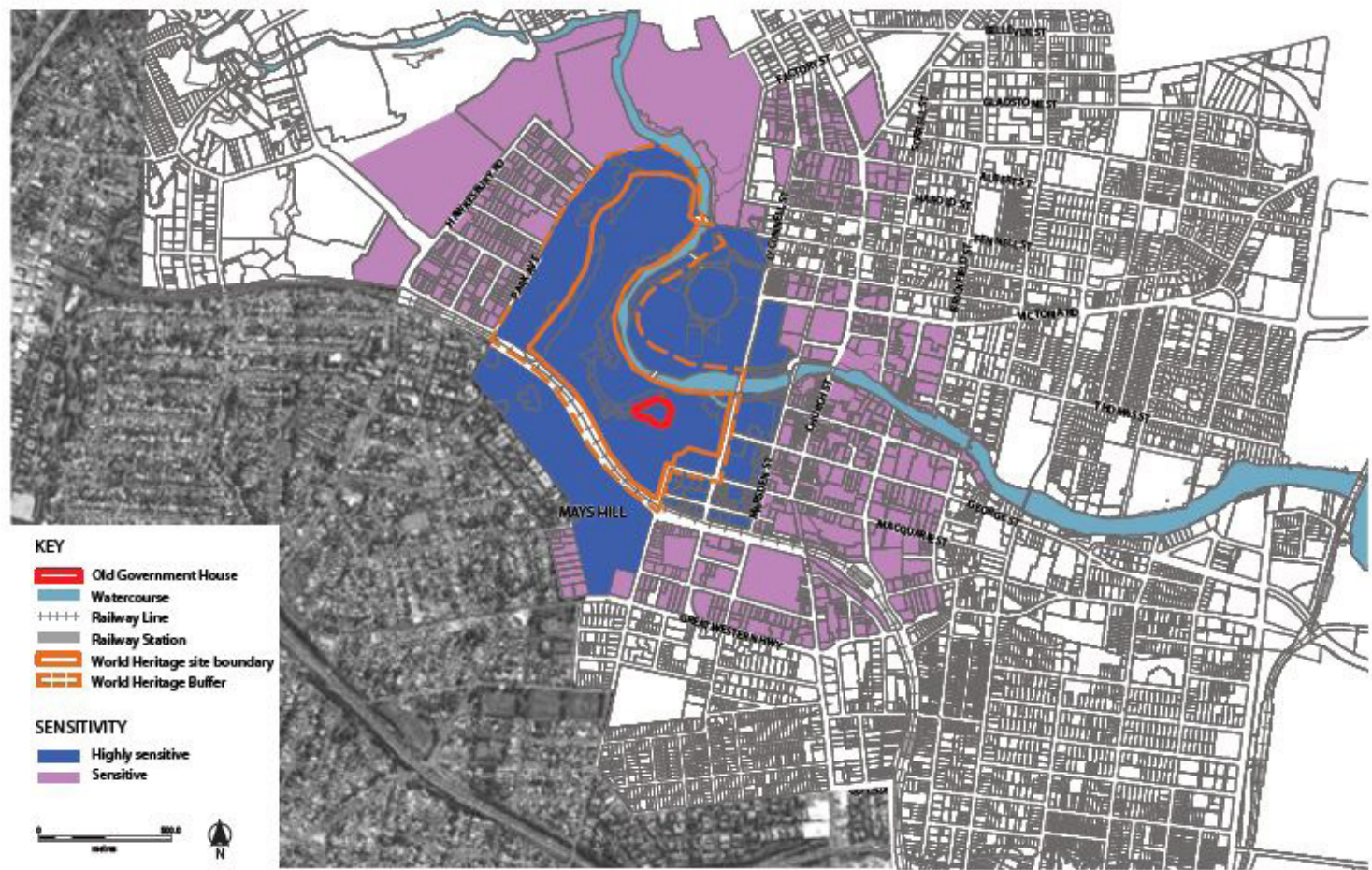
⁰⁴ SEARS Request Parramatta Hotel, prepared by Perica and Associates Urban Planning, October 2017, p.6

STATEMENT OF HERITAGE AND VISUAL ANALYSIS

3.2 HERITAGE CONTEXT

The site sits adjacent to Parramatta Park and Old Government House and Domain (OGHD), one of the 11 properties forming the Australian Convict Sites World Heritage Listing. The site sits on the boundary of the World Heritage buffer zone for OGDH. In addition, the Ross Street Gatehouse a c.1935 brick building falls within the site and forms part of the s.170 Heritage and Conservation Register of the Parramatta Park Trust (PPT). It is noted with reference to the document *Old Government House Views and Setting*, prepared by Planisphere, 2012, that the subject Site sits within the 'Park Edge' zone adjacent the World Heritage Site which has been assessed as a 'highly sensitive' context. The subject site is also adjacent to, or within, the key significant vistas associated with the Dairy and Mays Hill precincts of OGHD.

THE AREA OF SENSITIVITY



Development in Parramatta Technical Guide, Planisphere, 2012, p.81

To the north of the site is the boundary of the Parramatta North Historic Sites, a collection of state heritage items comprising the Norma Parker Correctional Centre and the Cumberland District Hospital Group. These sites are also recognised for their local significance in the Parramatta LEP and the subject site also sits to the southern boundary of the Parramatta North Historic Sites (PNHS). The PNHS fall within the Parramatta North Urban Transformation area which is being managed by UrbanGrowth NSW to ensure the retention and enhancement of heritage values through a program of urban regeneration. Part of the Parramatta North Historic Sites was included within the National Heritage List 14 November 2017, as Parramatta Female Factory and Institutions Precinct, Place ID 106234. The location map and boundary of the site is available via the following link <http://www.environment.gov.au/system/files/pages/96455f88-2b34-4b24-89b3-1510f6ef92bc/files/boundary-map-location.pdf>



Ross Street Gatehouse - North & East Elevation (source: Purcell)



Roseneath Cottage - (source: Purcell)



Norma Parker Correctional Centre (source: www.environment.nsw.gov.au)



Parramatta Correctional Centre (source: www.environment.nsw.gov.au)



Old Government House (Source: Flickr)

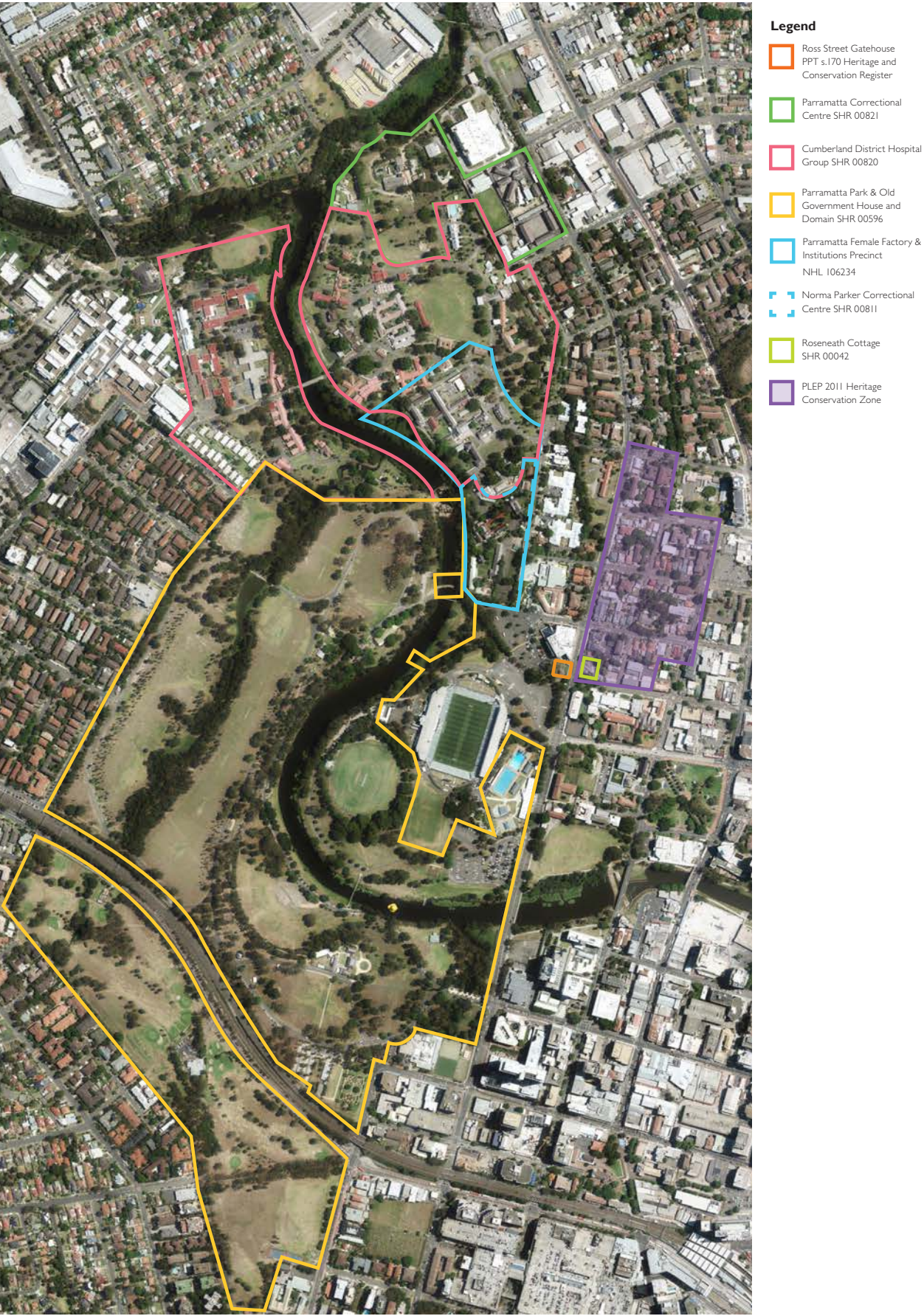


Cumberland District Hospital Group (source: www.environment.nsw.gov.au)

STATEMENT OF HERITAGE AND VISUAL ANALYSIS

Adjacent sites of heritage significance are identified and summarised as follows:

Old Government House and Domain
Australian Convict Sites World Heritage Listing
Register of the National Estate
National Heritage List Place ID 105957
State Heritage Listing 00596
Parramatta LEP 2011
National Trust Australia (NSW)
Parramatta Park
State Heritage Listing 00596
Ross Street Gatehouse
NSW State Heritage Inventory (PPT s.170 Heritage and Conservation Register)
Roseneath Cottage
State Heritage Listing 00042
Parramatta LEP 2011 (I00042)
Norma Parker Correctional Centre
NSW State Heritage Register [00811]
NSW State Heritage Inventory – Corrective Services s.170 Heritage and Conservation Register
Parramatta LEP 2011 (I000811)
Parramatta Female Factory and Institutions Precinct
National Heritage Listing (Place ID 106234)
Cumberland District Hospital
NSW State Heritage Register (00820)
NSW State Heritage Inventory – Corrective Services s.170 Heritage and Conservation Register
Parramatta Correctional Centre
NSW State Heritage Register (00821)
NSW State Heritage Inventory – Corrective Services s.170 Heritage and Conservation Register



STATEMENT OF HERITAGE AND VISUAL ANALYSIS

3.3 THE ROSS STREET GATEHOUSE

3.3.1 LOCATION

The Ross Street Gatehouse is situated on the western side of O’Connell Street in Parramatta, between Eels Place, to the north and Victoria Road, to the south. Historically the site has acted as an entrance to the Parramatta Park, Old Government House and Domain to the west, with direct access to the Dairy Precinct on the western bank of the Parramatta River.

3.3.2 STATEMENT OF SIGNIFICANCE

The following statement of significance has been extracted from the State Heritage Inventory and previous reports on the history and significance of the Ross Street Gatehouse.

The current Ross Street Gatehouse was erected in 1935. It stands on the site of the original gatehouse, built in c1844, possibly as the tradesman’s entrance to the Governor’s Domain on the riverland now known as Parramatta Park. The current Ross Street Gatehouse is a modest dwelling and the least grand of the Parramatta Park gatehouses. It is an example of the inter war bungalow style, constructed of double brick with a pitched iron clad roof, floral motif plaster patterned ceilings, front verandah and timber framed windows. Both of the Ross Street Gatehouses have facilitated the development of the parkland from the first successful farm and vice regal domain to that of a public park. The buildings have housed the gatehouse keepers, whose responsibility it was to control the passage of horse, bicycle, car and motorcycle racegoers, swimmers, picnics, football and cricket crowds, and carts loaded with sand, hay and livestock. In this role, the Gatehouses have been strategic entry and exit points, and allowed the keepers to collect park fees and keep gatewatch.⁰⁵ The current Ross Street Gatehouse is unremarkable in itself, yet together the Ross Street Gatehouses have facilitated development of the area from that of a farm and viceregal domain to Parramatta’s most significant parkland.⁰⁶

3.3.3 OVERVIEW HISTORY OF THE ROSS STREET GATEHOUSE

As stated above, there have been two Ross Street Gatehouses on this site. The first gatehouse erected on the site in c1844, remained until it could be repaired no longer, and in 1935 it was replaced with the current Ross Street Gatehouse.⁰⁷

19 July 1934 – Tenders were called for improvements to the Ross Street residence received from 5 bidders ranging from £187 to £289. The chairman was to interview the tenderers. Two tenders were received for fencing ‘from Western Rod to Bowling Green & Rings Bridge to Ross St’. The lower tender of J.Wodds was accepted.

30 August 1934 – The Chairman reported ‘that the Ross St Lodge was not in a fit condition to be repaired. The letter written by Mr Gollan suggested that the Govt advance £6000 for a new Lodge & deduct £50 p.a. from the subsidy was confirmed on the motion of Ald Jeffrey sec Mr Moxham & carried. A letter received from J.Wodds the successful tenderer for Byrne’s Drive fencing asking for a further 1/-per rod as he had not expected to do wiring etc [motion passed agreeing to his request]’. [letter?] from Dept re Ross St Lodge received.

13 December 1934 – ‘Chairman reported that he had induced the Premier to come to Parramatta & inspect the Ross St Lodge, which is in a very bad way, & not worth spending much money on, in present state. Premier will advise what can be done later on.’

16 March 1935 – ‘Specifications were prepared by Architect MacDonald for £2.2.0 for new lodge cottage at Ross St. These were approved generally & the matter left in the hands of the Chairman for any minor operations. 6 tenders from builders of the new Ross Street Gatehouse were considered ranging from £605 to £780 – the lowest: £605 from Messrs Muston & Lavers was accepted. ‘The Trust later inspected the Ross St site & approved a position further back, both from O’Connell St & road in park, for new lodge.’

23 September 1935 – It was reported that Mr Newling had signed a lease for Ross Street Lodge.⁰⁸

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⁰⁵ The Ross Street Gatehouse, A Heritage Development Plan, B.Wheeler, 1996, p.2
⁰⁶ Ibid, p.3
⁰⁷ Ibid, p.3
⁰⁸ Ibid, p.41-43

3.3.4 OBJECTIVES AND RECOMMENDATIONS OF THE 1996 HERITAGE DEVELOPMENT PLAN

The 1996 Heritage Development Plan determined that the present Ross Street Gatehouse, in and of itself, is ‘unremarkable’⁰⁹. It also acknowledged its limited capacity to convey the historic and cultural significance of the site as a contributory item to Parramatta Park, and Old Government House and Domain.¹⁰ The objectives of the Heritage Development Plan were to:

- Celebrate the cultural heritage of the site as a Gatehouse (entry/exit point) and interpret its historic links within Parramatta Park.
- Reinvent the house garden and invigorate the surrounding environment of the Ross Street Gatehouse. In so doing improve the amenity of the Ross Street entrance way to Parramatta Park.

As a means of interpreting the significance and roll of the site as a gateway to Parramatta Park, Old Government House and Domain the Heritage Development Plan made the following recommendations¹¹:

- Restoration of the roadway between the gatehouse and Parramatta River causeway, as a tree lined avenue leading to the dairy cottage.
- Artistic Interpretation of the gate as an ‘essential element in reviving the symbolic identity of the place and marking this entrance to the park.’
- Reinventing the Gatehouse garden with native plantings endemic to the area.



North and East Elevations, Ross Street Gatehouse (source: Purcell)

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⁰⁹ Ibid, p.3
¹⁰ Ibid, p.3
¹¹ Ibid, p.7-8



Southern Elevation, Ross Street Gatehouse (source: Purcell)

STATEMENT OF HERITAGE AND VISUAL ANALYSIS

3.4 THE PARRAMATTA NORTH HISTORIC SITES

3.4.1 LOCATION

The Parramatta North Historic Sites (PNHS) sit to the north of the development parcel, and the site of Parramatta Park, OGH D. The Parramatta River is located to its western boundary and O’Connell, New and Fleet Streets loosely define its eastern boundary. The individual sites are identified in the heritage listings map on page 8 of this report.

3.4.2 STATEMENT OF SIGNIFICANCE

The following summary of heritage values is drawn from Section 3 of the PNHS Consolidated CMP:

The Parramatta North Historic Sites are places of exceptional heritage significance for the people of Parramatta, New South Wales and Australia. Together they are a unique and evocative place that powerfully tells stories of colonial settlement and changing community attitudes to welfare, moral and social reform and mental health care in NSW from the colonial era to the present day.

The PNHS have been occupied from the 1820s onwards by government institutions responsible for the welfare of vulnerable and destitute children and vulnerable, destitute, infirm, insane and criminal adults. They are the only place in NSW where three colonial era institutions—the Parramatta Female Factory, Parramatta Gaol and Roman Catholic Orphan School—were located contiguously and where government-managed institutional uses have been maintained into the twenty first century.

The PNHS have great social significance historically and for present day Aboriginal and non-Aboriginal communities because of the children and adults that were confined within the various institutions across the site and the ways that they were treated. Although the institutions were founded with benevolent intentions, many of those resident at the institutions suffered harsh and at times brutal ill-treatment, neglect and were discriminated against while confined within them. They also have social significance for staff who worked at the various institutions. Together the Parramatta North Historic Sites represent the extent to which attitudes to social welfare and reform have evolved since the early nineteenth century to the present day.

The PNHS are also of historical significance because:

- They are part of the core of the territory of the Burramatta clan of the Darug. Aboriginal people today retain strong links with the PNHS.
- They are the location of the first government endeavours to harness and utilise water for the processing of grain in NSW and because of this, the location of the first mill race and water-powered mill on mainland Australia;
- They have historical and physical associations with adjoining sites of State, National and World Heritage significance including Old Government House and The Domain (Parramatta Park), Wistaria Gardens and Glengarriiff, all linked by the Parramatta River. Collectively this broader historical context represents one of the richest cultural heritage areas in Australia.
- It is the location of the Parramatta Female Factory, the oldest such institution in Australia and the only Female Factory in NSW for which standing buildings and walls remains. The Female Factory was part of a suite of convict and penal institutions that formed the backbone of the convict-period Parramatta, a town of convict confinements, servitude and administration and is one of very few where convict-period buildings are extant.
- It is the location of the Roman Catholic Orphan School, the first purpose-built institution in Australia for the care of Roman Catholic children and the only one built in NSW.
- It is the site of the Parramatta Industrial School for Girls an important and notorious reform school which was the longest operating children’s reformatory in NSW.
- It is the location of Parramatta Gaol, the oldest operating gaol in NSW until its closure in 2011,
- At a local level the PNHS are significant for the evidence they provide of Parramatta’s role in early colonial era food production and the considerable part that the institutions played in Parramatta’s economy during the nineteenth and twentieth centuries.

3.4.3 HERITAGE MANAGEMENT PRINCIPLES

The following Heritage Management Principles are identified for the PNHS and are relevant to the PLC proposal:

1. Decisions are based on a clear understanding of the heritage values of the PNHS and the need to retain, protect and enhance those values

3.5 PARRAMATTA FEMALE FACTORY AND INSTITUTIONS PRECINCT

3.5.1 LOCATION

The Parramatta Female Factory and Institutions Precinct sits to the southern end of the wider Parramatta North Historic Sites. Its principal address is that of Fleet Street, North Parramatta and is bound by the subject site to the south and the Parramatta River to the west.

3.5.2 STATEMENT OF SIGNIFICANCE

The following summary statement of significance is an edited extract from the Australian Heritage Database Listing for the site:

The Parramatta Female Factory and Institutions Precinct is an outstanding example of a place which demonstrates Australia’s social welfare history, especially regarding the institutionalisation of women and children over the 19th and 20th centuries. Institutionalisation was a core element of Australia’s welfare system for over 150 years, where those receiving social services were placed in ‘care institutions’ which provided government services in a residential setting. Through this period, the Precinct was the site of the Parramatta Female Factory for women convicts, a Roman Catholic Orphan School for Catholic children, and finally the Parramatta Girls Industrial School, a home for girls seen as neglected or wayward, including children from the Stolen Generations. Together, these facilities provided shelter, education and oversight of thousands of women and children, but they were also often places of poor treatment and abuse. Women and children had a distinctive experience of institutionalisation, due to the particular moral judgment that was imposed on women and their children who lived in poverty or were considered to be outside social acceptability.

The Precinct has retained buildings and spaces demonstrating the range of institutions on the site. These include original accommodation buildings and walls from the convict-era female factory, the original building of the Orphan School, and a number of buildings, walls and courtyards which were part of the Girls School, such as dormitories, assembly spaces, a chapel, and school and dining rooms. The remains of the Female Factory are rare in Australia, with few remnants of convict-era female factories left. Through this original fabric, the site demonstrates the distinctive experience of institutionalised women and children, who were subject to the system of care and control at the core of welfare institutions.

3.5.3 HERITAGE MANAGEMENT PRINCIPLES

The site is subject to the management framework of the PNHS CMP, and the National Heritage Management Principles of the EPBC Act 1999.

3.6 ROSENEATH COTTAGE

3.6.1 LOCATION

Roseneath Cottage is situated at 40-42 O’Connell Street and sits opposite the Ross Street Gatehouse and subject development site. The Cottage also sits within a Conservation Zone scheduled within the PLEP, and identified within the heritage listings map on page 9 of this report.

3.6.2 SUMMARY STATEMENT OF SIGNIFICANCE AND HISTORIC OVERVIEW

Roseneath Cottage was built in 1837 for Janet Templeton. It is of significance for its historic association with this pioneer of the Australian wool industry who is believed to have been responsible for the introduction of the merino sheep to the colony of Victoria. Roseneath is also of aesthetic significance as a simple yet elegant sandstock brick colonial cottage, having a symmetrical street faade consisting of a central doorway with an elliptical fanlight, two twelve panelled shuttered windows, turned timber columns and sandstone flagging to the verandah on three sides. A well-proportioned house having a faade of unusual harmony and charm Roseneath is considered to be the best surviving example of a colonial town cottage exterior within the County of Cumberland. The building’s heritage significance was early recognised when it was proclaimed to be “a place of historic interest” under the County of Cumberland Planning Scheme in 1960 and it was furthermore amongst the first fifty places in NSW to be listed under the Heritage Act 1977¹².

4 PARRAMATTA LEAGUES CLUB HOTEL DEVELOPMENT

4.1 LOCATION

The site of the proposed development is to the immediate south of the existing Parramatta Leagues Club (PLC) building, to the east of a 4-8 storey carpark currently under construction and to the north of the Parramatta Stadium. It site to the west of the Ross Street Gatehouse.

4.2 OVERVIEW OF DEVELOPMENT PROPOSAL

The proposal involves the demolition of existing improvements and erection of a 17 storey hotel building (plus a single level basement for services) accommodating 209 beds and including the lower 4 levels containing a café, pool, fitness/recreational uses and a function room ancillary to the hotel. Access is proposed from O’Connell Street to the south of the building (via an access road to the adjoining Parramatta Stadium), and the proposal includes public domain works and services upgrades surrounding the building to integrate the building with the surrounding area and infrastructure.

No additional parking is proposed, given the adjoining approved large carpark.

The proposal is depicted within the conceptual plans by HASSELL as attached to the EIS.

¹² <http://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=504513>

STATEMENT OF HERITAGE AND VISUAL ANALYSIS

5 ASSESSMENT OF POTENTIAL HERITAGE IMPACT

5.1 PRELIMINARY VISUAL IMPACT ASSESSMENT

5.1.1 METHODOLOGY

The modeling and analysis of views, for the purpose of this preliminary assessment, has been informed by the publication Development in Parramatta Technical Guide, prepared by Planisphere, 2012 and the Development Control Plan. Both the DCP and Technical Guide form part of the Federal Environment Minister’s Conservation Agreement for the protection and conservation of the World Heritage Values and National Heritage Values of the Australian Convict Sites, Old Government House and Domain, Parramatta, New South Wales, executed 23 December 2015. The views of the DCP are referenced within the Technical Guide. The views outlined within the DCP Figure 4.3.3.7.7 are subject to a building height control which mandates that 80% of the building height is to be contained below the level of the surrounding established tree canopy.

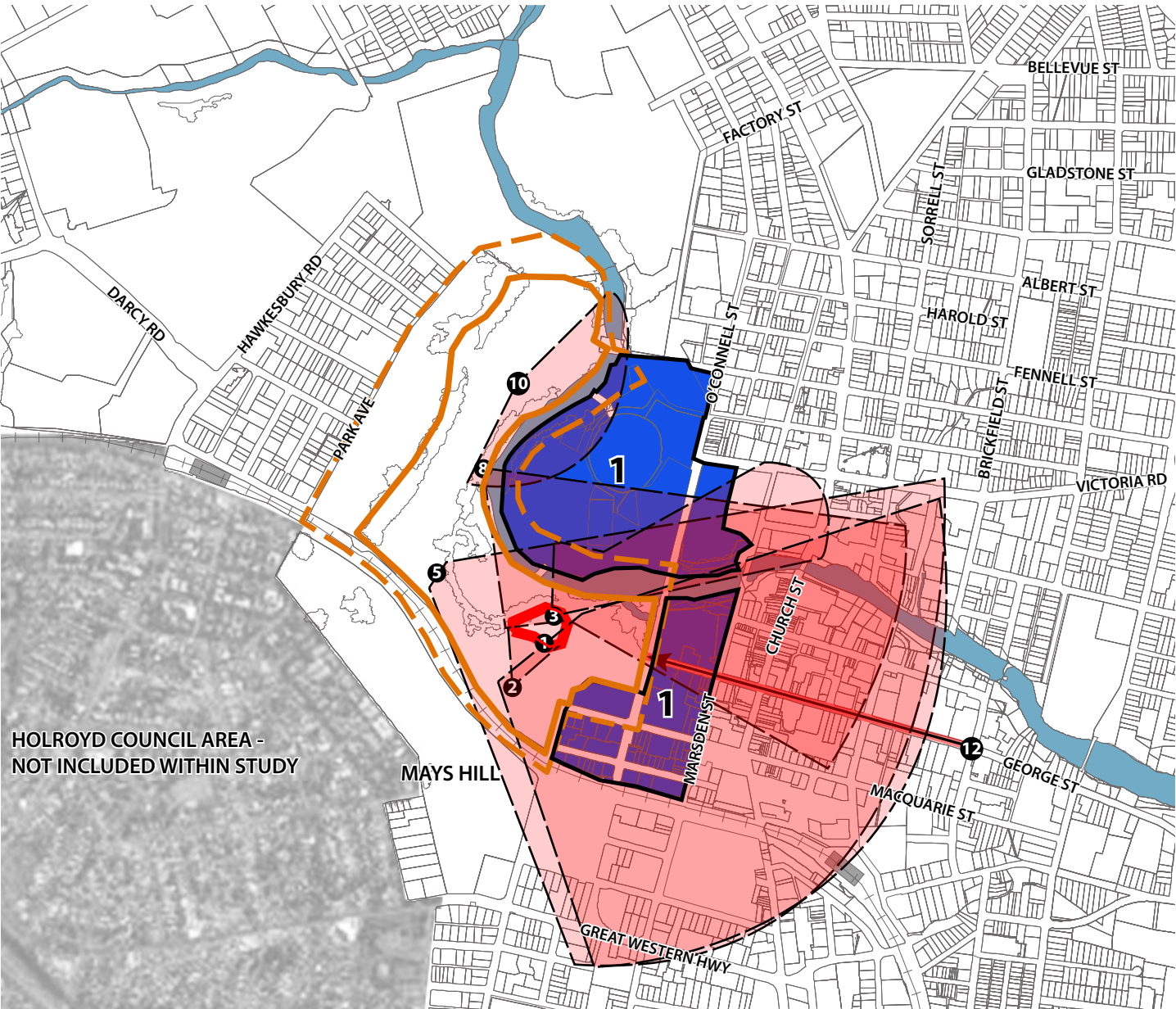
In addition the significant views outlined within the Parramatta North Historic Sites Conservation Management Plan, prepared by TKD Architects, 2017, have been considered.

The views important to the assessment of the subject site, located within the Park Edge: Highly Sensitive Zone are considered to be those with view cones falling across, or to the perimeter of the site subject of this proposal. These views are summarised as:

- View 3 - OGH to former Kings School
- View 10 - Dairy Precinct
- View 16 - Mays Hill Precinct
- Views 6 and 7 of the PNHS CMP

Through consultation OEH requested (13 November 2018 DOC18/751317) the inclusion of (Technical Guide) View 6: From Crescent to City, and for further assessment of the potential impacts of views from the Parramatta Female Factory and Institutions Precinct. These views assessments have been included within the Final HVIA. It is however noted that View 6 does not fall within the views of the Park Edge Highly Sensitive Zone within which the subject site is located (see adjacent plan). It is also noted that the views to the PNHS as identified within Figure E-8 of the PNHS CMP had been accounted for. Views from the PNHS, as represented by Figure E-9 of the PNHS CMP do not interface with the subject site and as such views within the Norma Parker Centre, as identified within Figure E-10 of the PNHS CMP have been employed within this assessment.

Each of the views is modeled by HASSELL over the following pages with inclusion of the relevant extract of the reference document, current and proposed views. These views have been modeled in accordance with the SEARs requirements as outlined in Section 2.6 of this report.



Location of Important Views: Park Edge Highly Sensitive (Source: Development in Parramatta Technical Guide, Planisphere, 2012, p.90)

STATEMENT OF HERITAGE AND VISUAL ANALYSIS

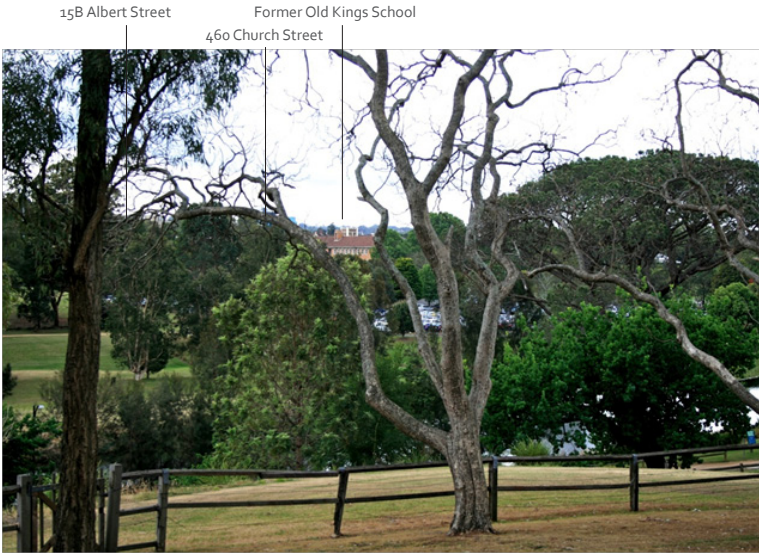
5.1.2 VIEW ANALYSIS

VIEW 3: OGH TO FORMER KINGS SCHOOL

Viewing Location	NE corner of OGH to former Kings School
Direction / type of view	North east / Point to area view
Description of view	<p>Immediate foreground: Lawns, open fence and mostly deciduous trees (Jacarandas).</p> <p>Foreground: exotic trees, river and Government farm beyond. Parked cars partly visible.</p> <p>Middle Ground: Narrow view of former King's School building (upper floor), St Patrick's Spire is occasionally visible although mostly obscured by trees.</p>
Physical Components	<p>Fairly steep slope down to river. Undulating beyond.</p> <p>Vegetation: mown lawns and spaced trees (Eucalypts and exotics) River visible through trees. Simple open fence, carpark is fairly dominant and school visible. Part of Government farm site visible. Trees provide sense of enclosure.</p>
Experiential/sensory components	Proximity to OGH, river and farm provide fairly strong sense of place.
Aesthetic considerations	Composition: Point to area view with a fair composition, lack of focal point. Visual quality: while there is no particular focal point there are a number of compelling elements within this view. Rarity: one off rare view
Values significance	<p>HIGH</p> <p>Very strong layering of landscape elements including the School building, church spires and Government farm which provide historical connection to colonial era. Tree lined ridge on the horizon helps to evoke a sense of the rural.</p>
Urban Design / Park Management notes	<p>Trees obscure views towards Old Kings school and church spires.</p> <p>Car parking dominates views in the foreground</p>



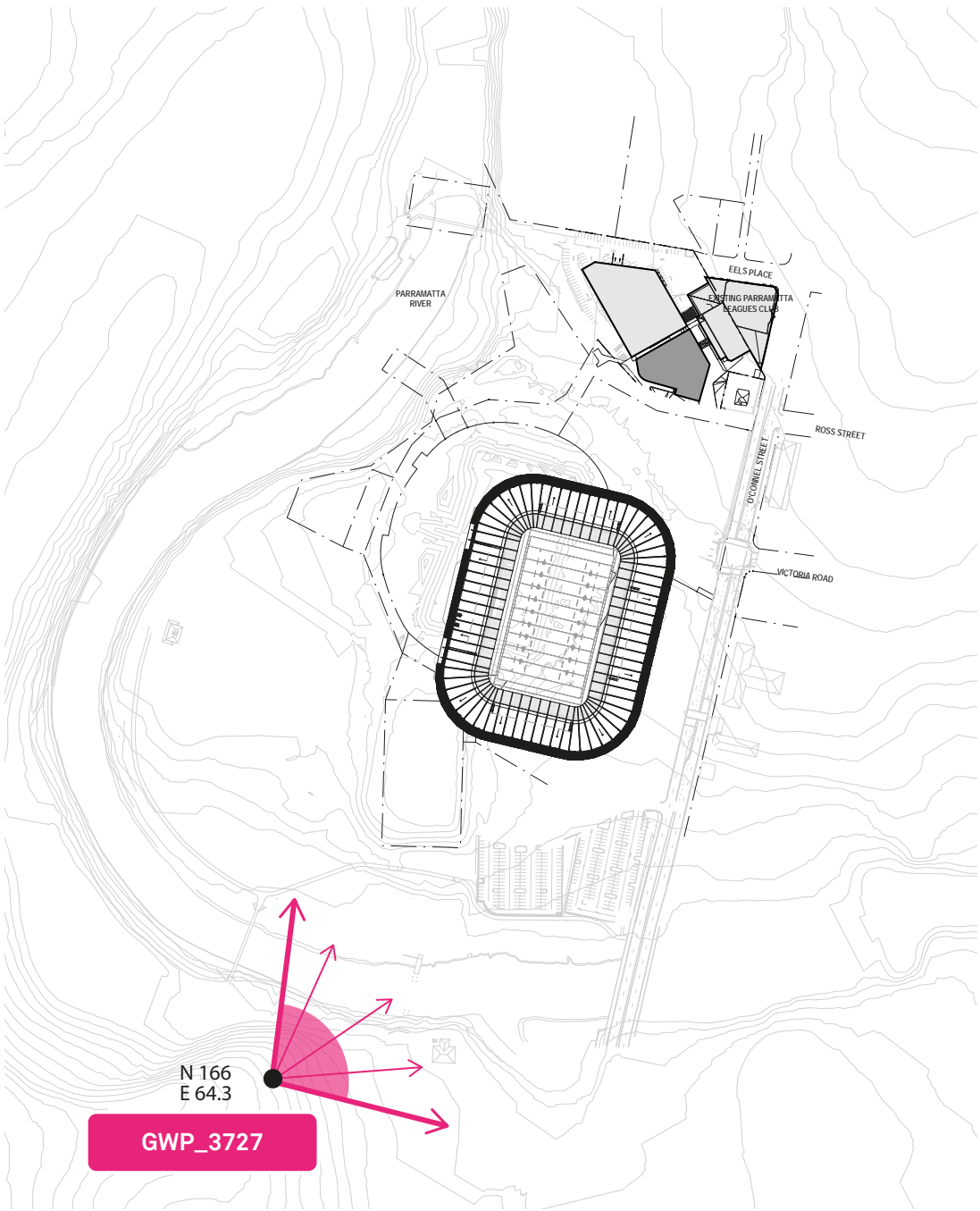
LOCATION OF VIEW



Looking North from OGH (Source: Development in Parramatta Technical Guide, Planisphere, 2012, p.50)

Development in Parramatta Technical Guide, Planisphere, 2012, p.50

STATEMENT OF HERITAGE AND VISUAL ANALYSIS



GWP_3727 (Source: GWP)



View looks from OGH north toward the Stadium and subject site. The proposed design envelope for Western Sydney Stadium is shown dashed. PLC Hotel is not visible in this frame. (Source: HASSELL)

VIEW 6: FROM CRESCENT TO CITY

Viewing Location	View towards City from the Boer War Memorial steps
Direction / type of view	East to north east / Point to area view
Description of view	Immediate foreground: Regenerated woodland with medium size eucalypts and other species. Vegetation is managed to create a grassy understory with views through trees. Foreground: Grassy Crescent amphitheatre with trees and glimpsed views of river. Middle ground: City buildings partially obscured by vegetation. Distance: Long views to are available to the tree'd ridge on the horizon
Physical Components	Steep slopes down to amphitheatre. Undulating with low hills beyond. River partially visible. Two Church spires at St Patrick's and All Saints are visible in the midground. The Sebol hotel is a prominent feature with its asymmetric roof line and light colours. The amphitheatre (site of Government garden) and Government farm across river are significant heritage features. Moderate integrity. Enclosed view (varies with viewing point).
Experiential/sensory components	Parklike landscape.
Aesthetic considerations	Composition: point to area view taking in a broad panorama of the city against a foreground of vegetation and tree lined ridge in the background. Visual quality: moderate visual quality with some historic features. Rarity: rare view, similar views available from around the crescent.
Values significance	MODERATE Layering of landscape elements including the crescent and the river. Views north towards the tree'd ridgeline create a sense of openness and rurality against the city.
Urban Design / Park Management notes	Planting partly obscures views

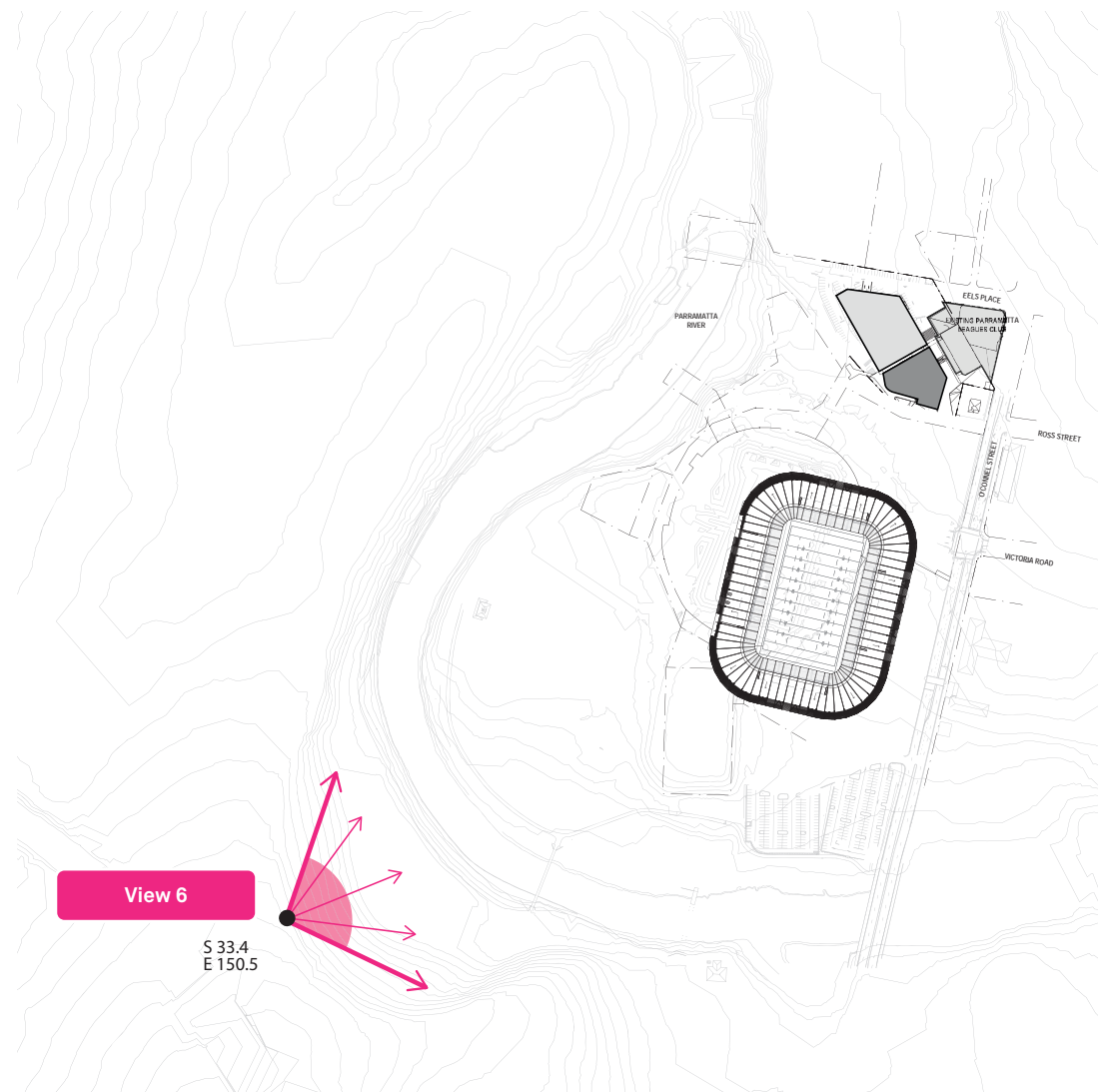


LOCATION OF VIEW



View 6 (Source: Old Government House Views and Settings, p.57)

STATEMENT OF HERITAGE AND VISUAL ANALYSIS

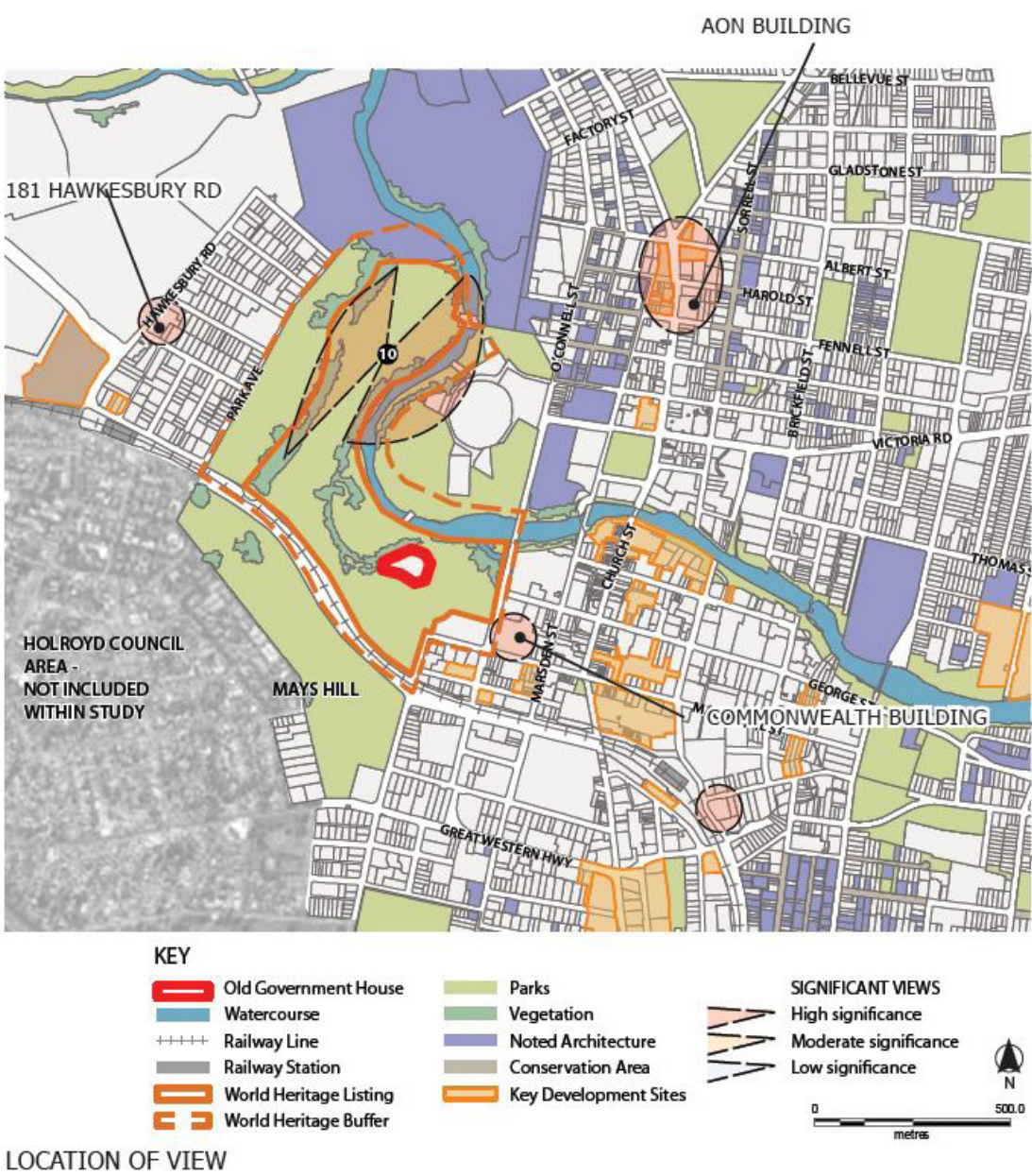


View looks towards the City from the Crescent (Source: HASSELL)

VIEW 10: DAIRY PRECINCT

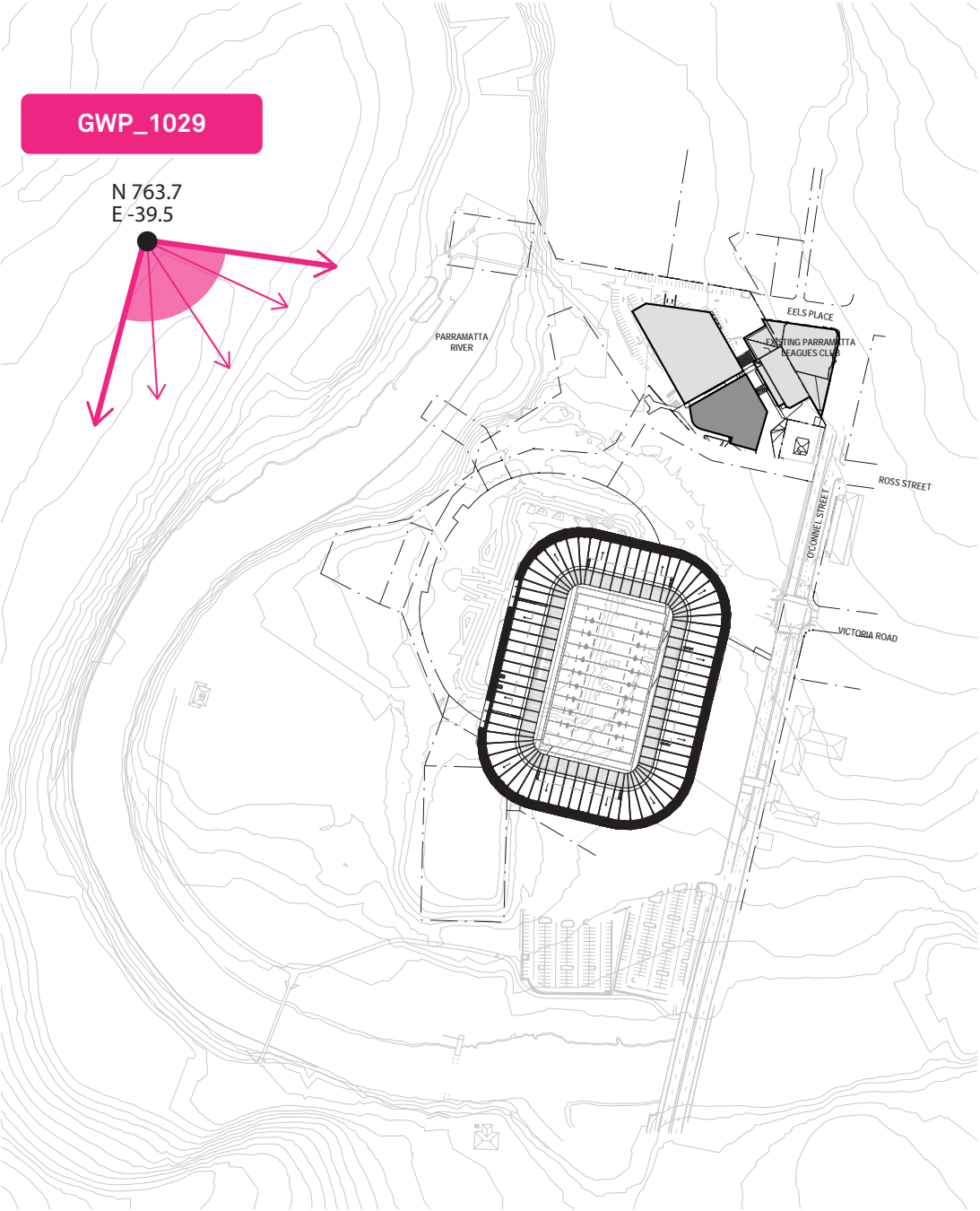
Viewing Location	Dairy Precinct
Direction / type of view	1. To North East and South East / Point to area view 2. To West / Point to area view
Description of view	<p>To E (top left photo) Immediate foreground: Lawns, sparse trees, Foreground: Open grass/woodland setting with mature trees and expansive lawns. Middle ground: Densely wooded, development evident in North Parramatta through trees.</p> <p>To SE (top right photo): Immediate foreground: Lawns, isolated trees. Foreground: Open woodland setting with mature trees and expansive lawns. Middle ground: Densely wooded, city buildings visible from some viewing points (including Deloitte and Commonwealth buildings).</p> <p>To W: Views across the lawn terminate at the thickly vegetated creek which screens views from development along Park Avenue. 181 Hawkesbury Road is visible above the treeline.</p>
Physical Components	Undulating landform sloping down to river. Vegetation as above. Dairy buildings the main heritage and built element Mature trees provide strong sense of enclosure.
Experiential/sensory components	Strong sense of place related to colonial period – dairy precinct and park-like setting with road following old carriage way.
Aesthetic considerations	Composition: point to area views with the dairy precinct as a landmark feature. Visual quality: tranquil views with historic elements. Rarity: one off views
Values significance	<p>HIGH</p> <p>Strong layering of landscape elements including dairy buildings, alignment of former carriageway and landscaped parkland. Rural qualities. Tree lined creek terminates views creating closure.</p>
Urban Design / Park Management notes	Tree line is essential in protecting the highly rated values in this location.

Development in Parramatta Technical Guide, Planisphere, 2012, p.64

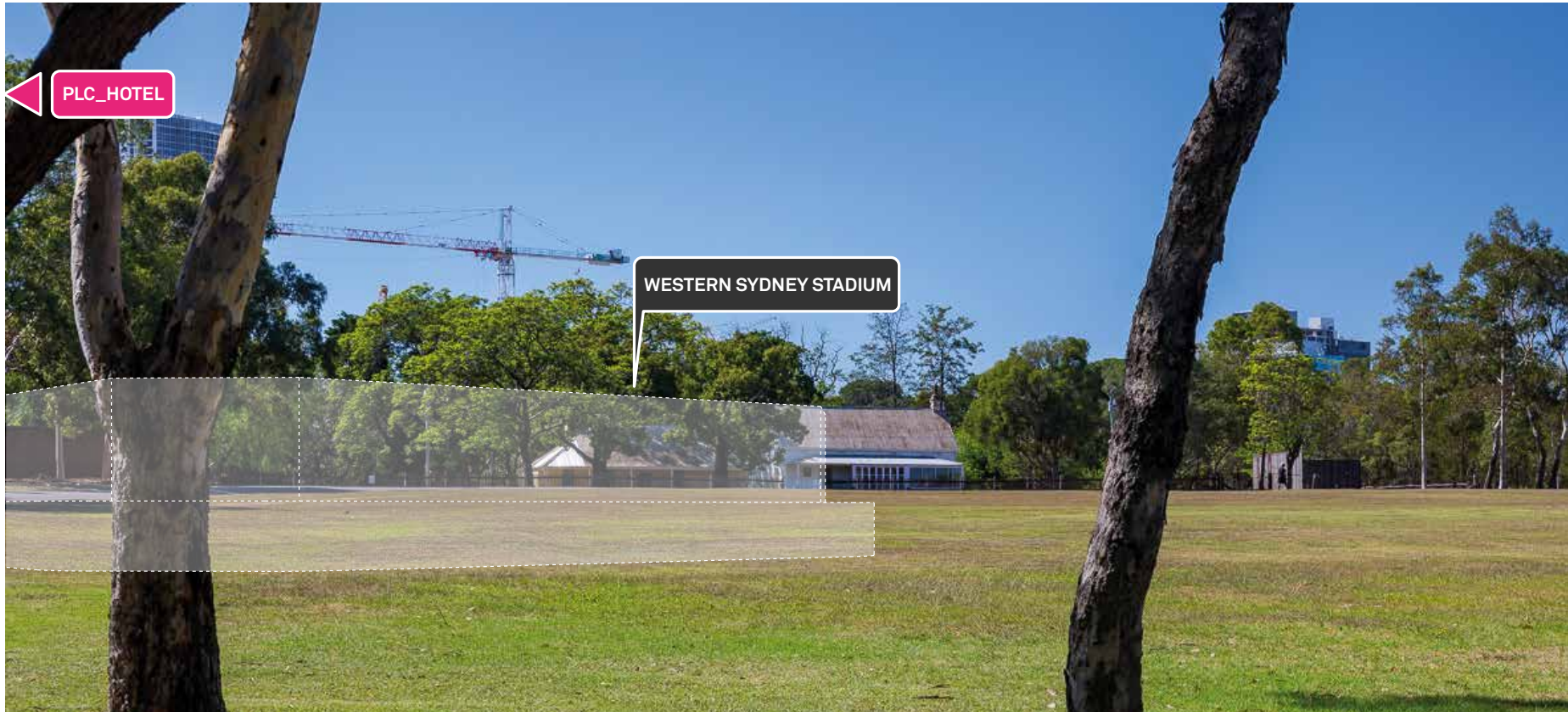


Looking East (Dairy in foreground) Source: Development in Parramatta Technical Guide, Planisphere, 2012, p.65)

STATEMENT OF HERITAGE AND VISUAL ANALYSIS

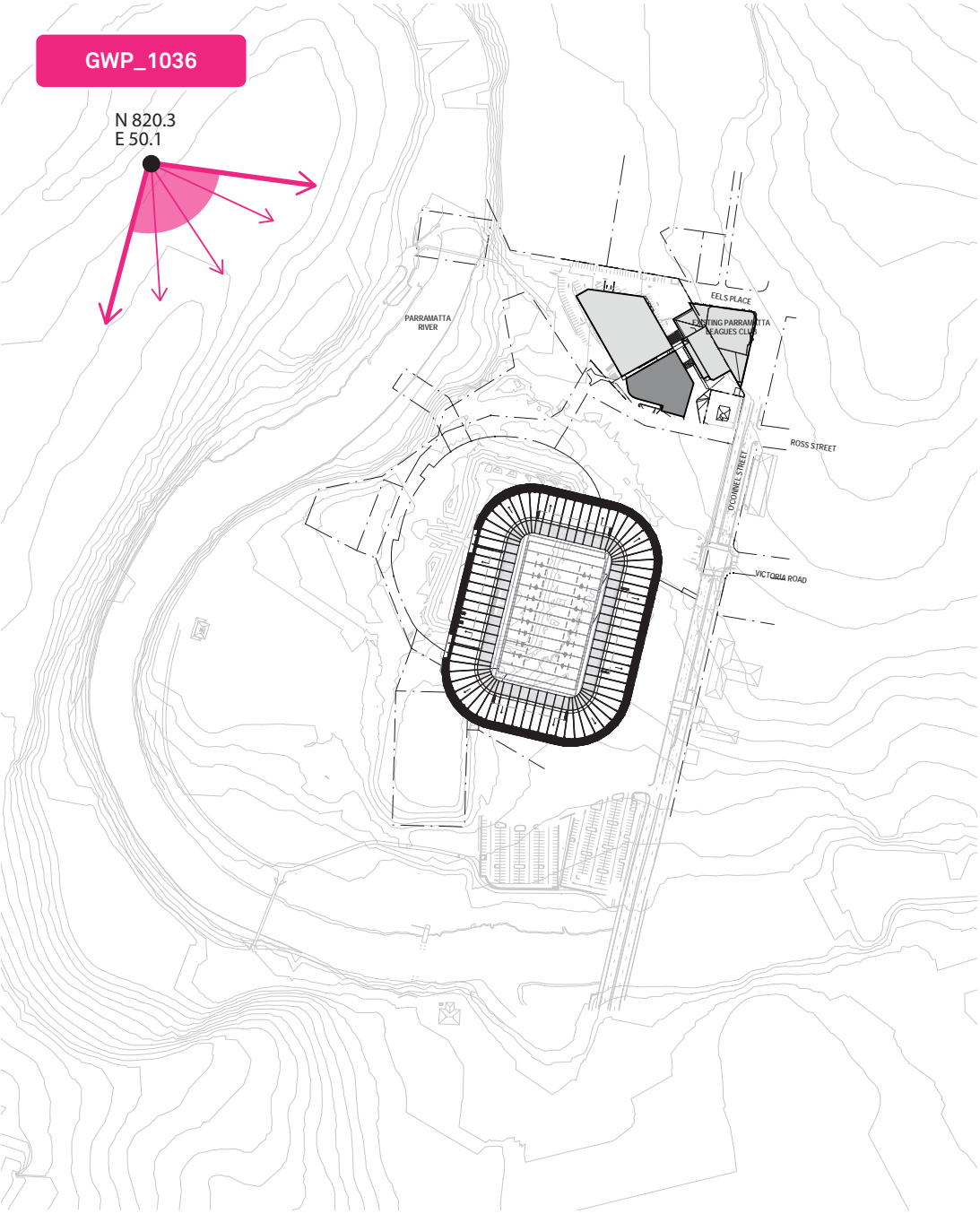


GWP_1029 (Source: GWP)



View looks towards the historic dairy building. The proposed design envelope for Western Sydney Stadium is shown dashed. PLC Hotel is not visible in this frame. (Source: HASSELL)

STATEMENT OF HERITAGE AND VISUAL ANALYSIS



GWP_1036 (Source: GWP)



View looks towards Parramatta CBA across Parramatta Park. The proposed design envelope for Western Sydney Stadium and Urban Growth towers are shown dashed. PLC Hotel is hidden from view by existing parkland trees. (Source: HASSELL)

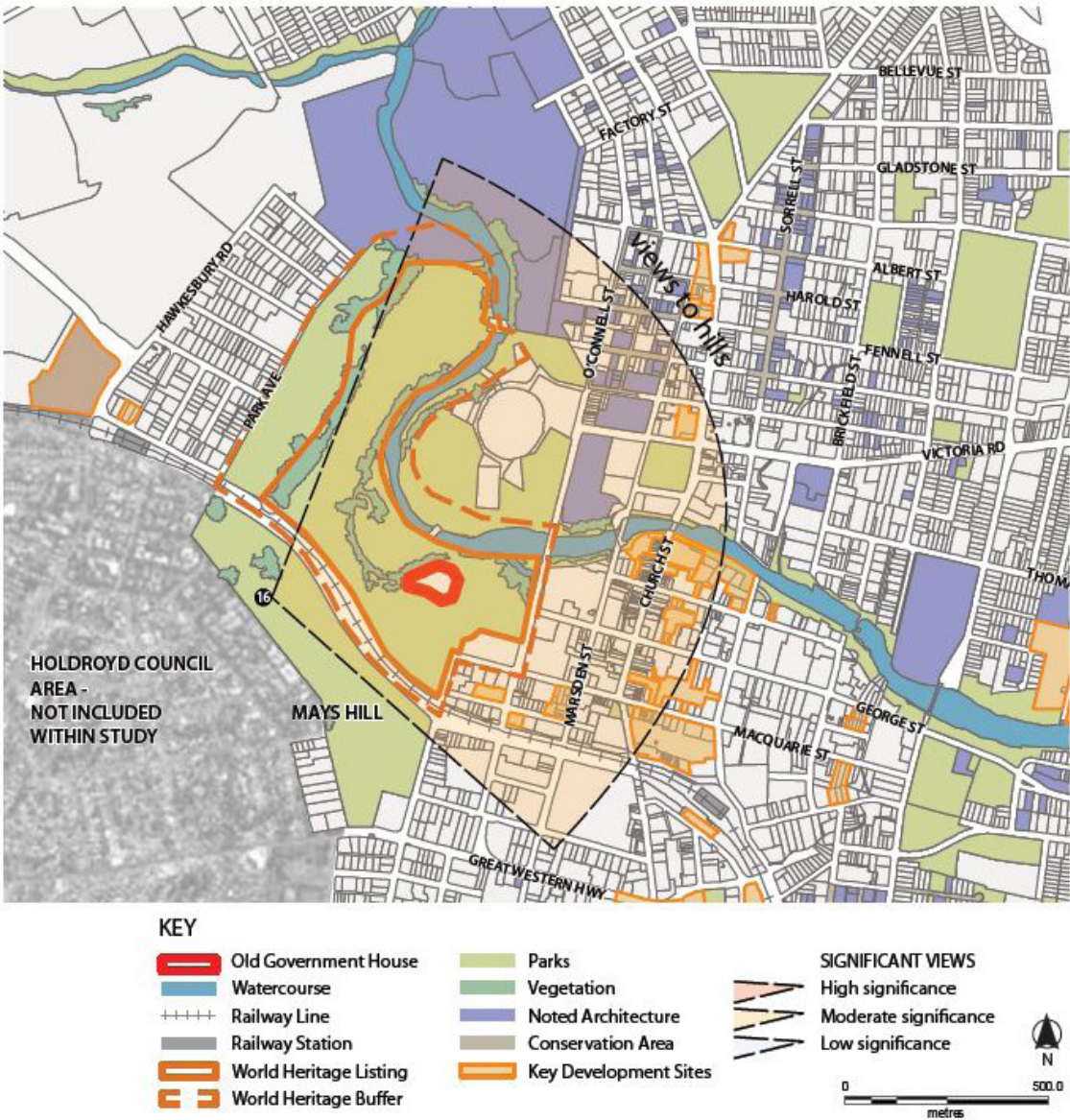
STATEMENT OF HERITAGE AND VISUAL ANALYSIS



Looking East (Dairy in foreground) Source: Development in Parramatta Technical Guide, Planisphere, 2012, p.77

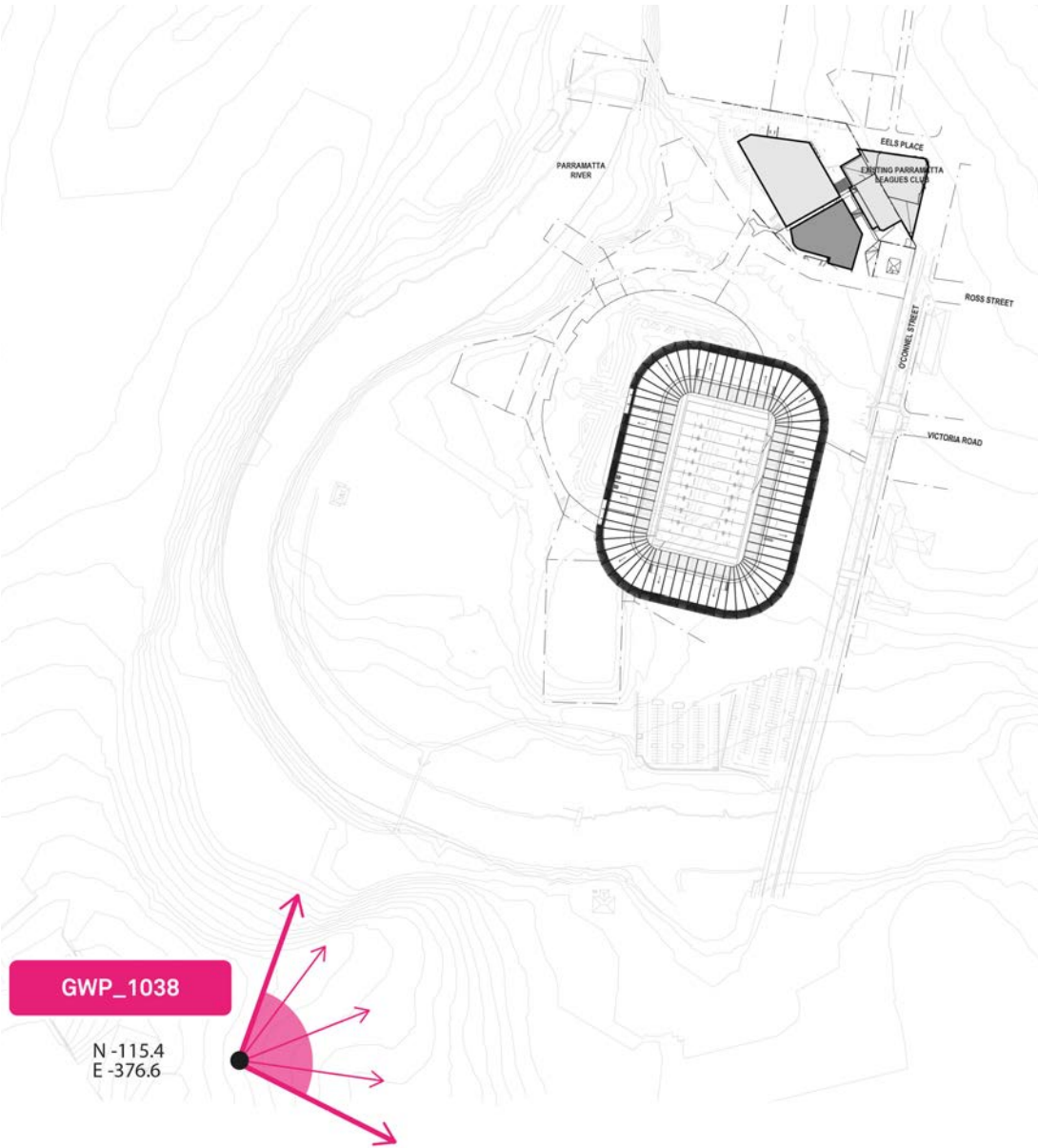
VIEW 16: MAYS HILL

Viewing Location	Mays Hill
Direction / angle of view	West, North west / area to area view
Description of view	<p>Immediate foreground: Grassed slopes</p> <p>Foreground: tree canopy, trees, grassed slopes, golf course, single trees. Middleground: panoramic views over the treetops towards Parramatta Park and the City skyline</p> <p>Middle distance: Paramatta City skyline to the West and a majority green outlook to the North west</p> <p>Background: long range views towards tree'd horizon</p>
Physical Components	<p>Land sloping west</p> <p>Vegetation as above.</p> <p>The city skyline is a strong visual element against the tree canopy</p>
Experiential/sensory components	Fairly strong sense of place - views towards the Domain are not distinctive or differentiated from views in other directions towards vegetation
Aesthetic considerations	<p>Composition: area to area panoramic view.</p> <p>Visual quality: The city skyline and golf course are the dominant features.</p> <p>Rarity: rare, one off view</p>
Values significance	<p>MODERATE</p> <p>There is a strong layering of landscape elements Parramatta Park and the City visible</p>
Urban Design / Park Management notes	



Development in Parramatta Technical Guide, Planisphere, 2012, p.76

STATEMENT OF HERITAGE AND VISUAL ANALYSIS



GWP_1038 (Source: GWP)



View looks north-east towards Western Sydney Stadium. PLC Hotel can be seen behind the stadium surrounded by the proposed Urban Growth towers. (Source: HASSELL)

STATEMENT OF HERITAGE AND VISUAL ANALYSIS



Parramatta North Historic Sites Consolidated CMP,TKD Architects, 2017, p.E7 (Source: xxx)

VIEW 6C AND 7 - FROM BYRNE'S AVENUE (SOUTH), CAUSEWAY AND PEDESTRIAN BRIDGE TO NORMA PARKER CENTRE/KAMBALLA SITE AND CUMBERLAND HOSPITAL (EAST CAMPUS) SITE AND FROM PEDESTRIAN PATH TO NORMA PARKER CENTRE/KAMBALLA SITE

The following is an edited extract from the PNHS CMP, prepared by TKD Architects, dated 2017. Views of the Roman Catholic Orphan School and later the perimeter walls of the Parramatta Girls' Industrial School have dominated the view up the river first from Byrne's Avenue (south), the causeway and then also from the pedestrian bridge. In the distance are the weir (constructed c1901) and the river terraces of the Female Factory/ Lunatic Asylum Precinct.

These views were popular in the early twentieth century with the establishment of the southern section of Byrne's Avenue as a formal walk. These historic views remained in place up until the 1980s after which time they started to be impacted by weed growth and the planting of dense vegetation along the riverfront of Norma Parker Centre/Kamballa site. Today only glimpses of the buildings and structures of both sites are possible from the causeway and pedestrian bridge.

The pedestrian path is located on a similar alignment as the early service roadway that provided access to Government House from O'Connell Street and so would have had views of the buildings of the Roman Catholic Orphan School (in particular Bethel House) prior to 1887 when the site was converted to become the Parramatta Girls' Industrial School and the perimeter and compound walls were constructed. The perimeter walls of the Girls' Industrial School dominated.

Views have been significantly impacted by dense vegetation since the 1980s. Views are currently defined by glimpses of the south boundary brick perimeter wall (N17) to the East Campus site (constructed as part of the Roman Catholic Orphan School's adaption to become the Girls' Industrial School in 1886).



Glimpses of the Norma Parker Centre/Kamballa site from the causeway



The weir and the Female Factory/Lunatic Asylum Precinct from the bridge



The view of the perimeter wall of the Norma Parker Centre/Kamballa site



Parramatta River in the 1890s (left). The view of the southern extension of the wall from the pedestrian walkway (former service road)

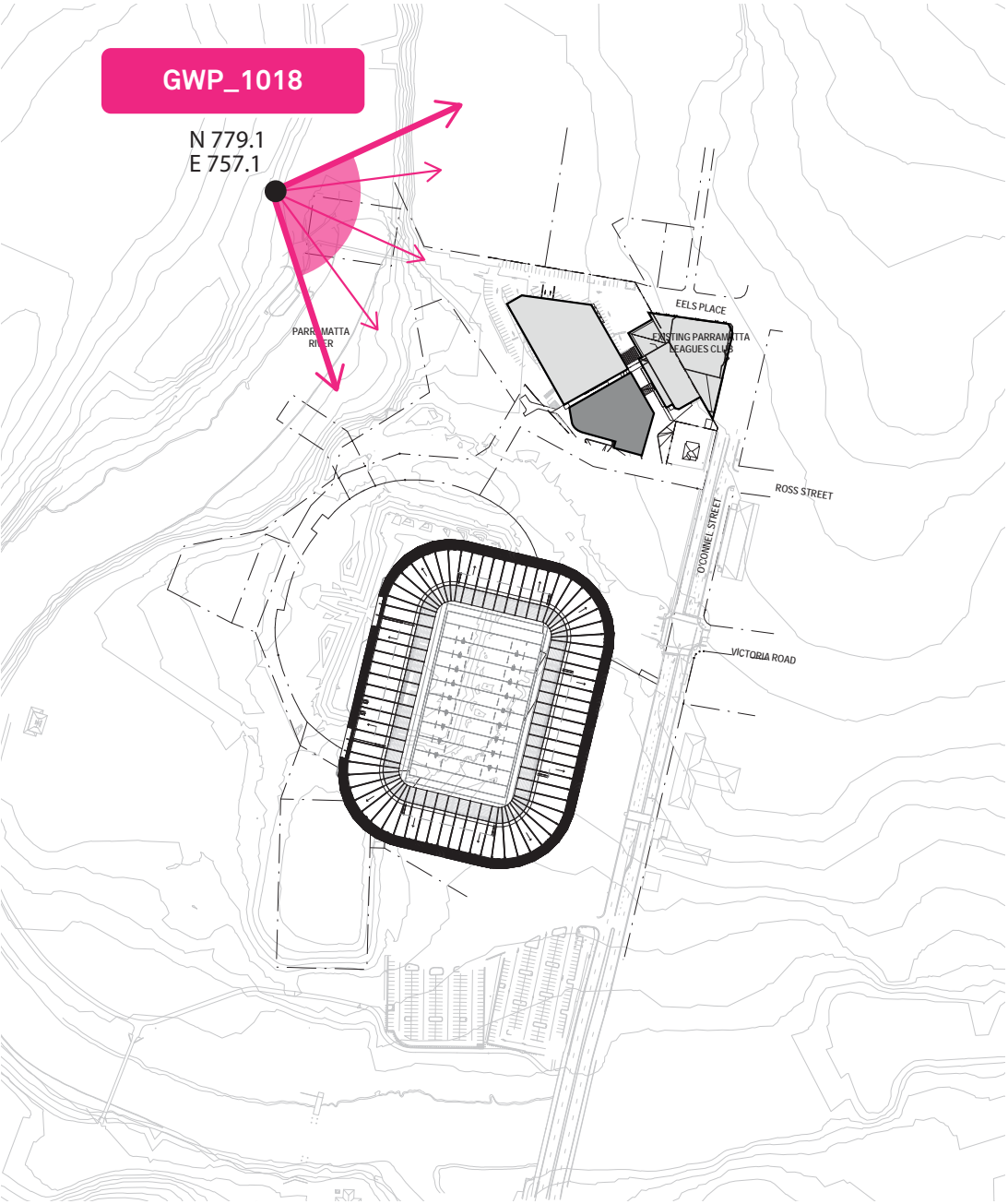
Significance

The glimpses of the buildings and walls of the Norma Parker Centre/Kamballa site, the weir and the Female Factory/Lunatic Asylum Precinct in the distance are a remnant of once expansive views that existed up until the 1980s. Re-instatement of the views would greatly assist with interpretation of the development of both sites. It would also assist with an appreciation of the aesthetic qualities of the Female Factory/Lunatic Asylum Precinct within its riverfront setting including the formal lawn terraces and cultural plantings down to the river edge. The view of the southern perimeter wall of the Norma Parker Centre/Kamballa site provides evidence of the changes made to the site between 1887 and 1893 to establish the Parramatta Girls' Industrial School. This view is one of the last remaining of the perimeter wall that was once prominent in the landscape when viewed from Parramatta Park and along the river.

Preliminary Management Recommendations

- The impacted historic views of the buildings of the Female Factory/Lunatic Asylum Precinct and their riverfront setting and the walls and buildings of the Norma Parker Centre/Kamballa site should be re-instated when the opportunity arises through removal of non-significant or intrusive vegetation (weed species) from both sides of the river.
- New plantings along the riverfront should ensure that re-instated views of the Female Factory/Lunatic Asylum Precinct and its riverfront setting and the buildings and walls of the Norma Parker Centre/Kamballa site are retained and enhanced.
- The location, bulk, height and materiality of any new development within the Historic Core and within the wider Norma Parker Centre/ Kamballa site will need to consider the potential for adverse impacts on the view to the Female Factory/Lunatic Asylum Precinct and its riverfront setting and the buildings and walls of the Norma Parker Centre/Kamballa site.
- The impacted historic views of the perimeter wall of the Norma Parker Centre/Kamballa site should be re-instated when the opportunity arises through removal of non-significant or intrusive vegetation (weed species) from both sides of the river.
- New plantings should ensure that re-instated views of the perimeter wall of the Norma Parker Centre/Kamballa site are retained and enhanced.
- The location, bulk, height and materiality of any new development within the Norma Parker Centre/Kamballa site will need to consider the potential for adverse impacts on the view to the perimeter wall of the Norma Parker Centre/Kamballa site.

STATEMENT OF HERITAGE AND VISUAL ANALYSIS



GWP_1018 (Source: GWP)



View looks towards proposed PLC Hotel from Little Coogee Walk. (Source: HASSELL)

STATEMENT OF HERITAGE AND VISUAL ANALYSIS



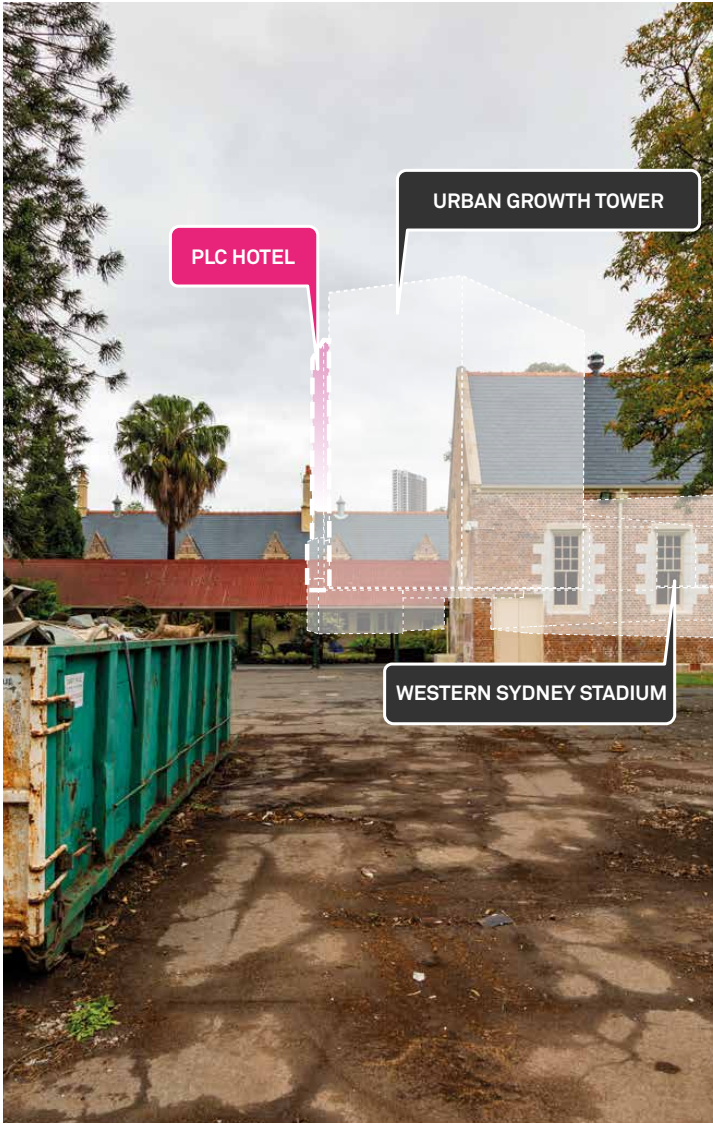
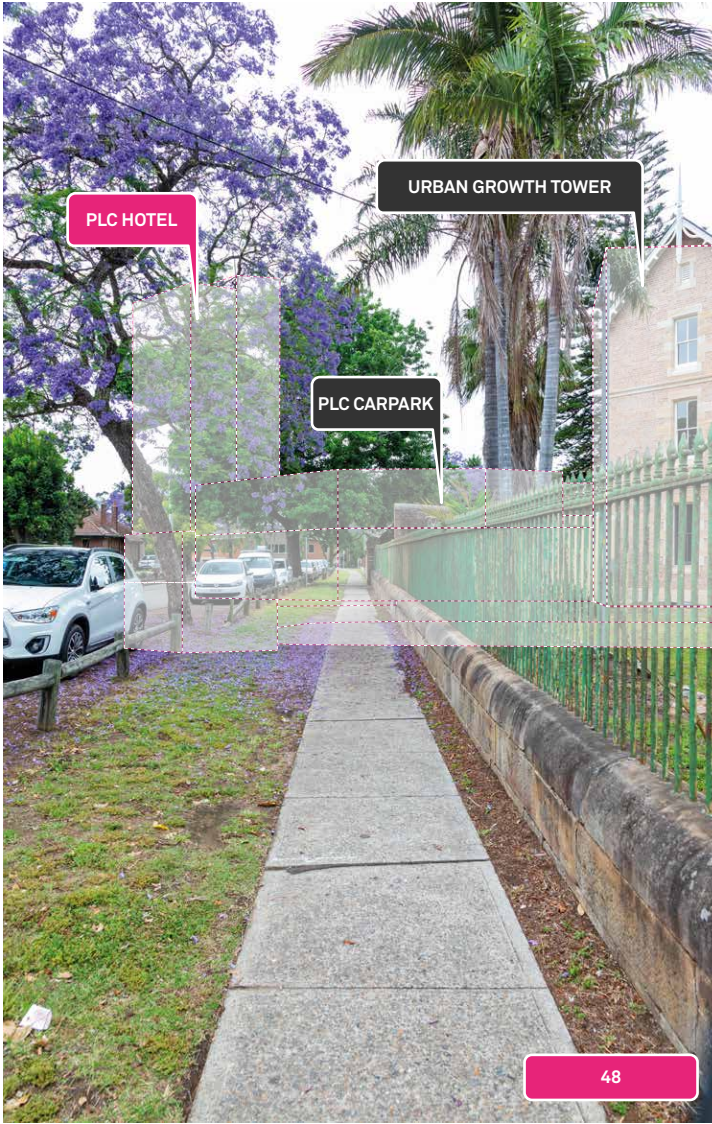
An aerial view of the Parramatta North Historic Sites identifying the existing and impacted historic views within the PNHS. (Source:TKD Architects, 2017)

VIEWS FROM WITHIN THE NORMA PARKER CENTRE/KAMBALLA SITE

At the request of OEH this Assessment considers the potential impact of the proposed development on the Norma Parker Centre/Kamballa Site. For the purposed of this exercise significant views have been identified from Map extract E-I0 from the PNHS CMP, prepared by TKD Architects, dated 2017, with general orientation taken toward to proposed development site.

The proposed development does not correspond with views 22a, 23 or 24 from PNHS CMP Map extract E-9.

STATEMENT OF HERITAGE AND VISUAL ANALYSIS



Views toward the PLC from within the Norma parker Centre (Source: HASSELL)

STATEMENT OF HERITAGE AND VISUAL ANALYSIS

5.2 ASSESSMENT AGAINST ENVIRONMENTAL PLANNING INSTRUMENTS, POLICIES, GUIDELINES AND BEST PRACTICE PRINCIPALS

5.2.1 ASSESSMENT AGAINST: ENVIRONMENT PROTECTION AND BIODIVERSITY CONSERVATION ACT, 1999		
It must be assessed if the proposal will have, or is likely to have, a significant impact on the World and National Heritage values of OGH. It must be assessed if the proposal has a 'real chance or possibility' that the 'action' will 'involve construction of buildings or other structures within, adjacent, to or within important sight lines of, a World Heritage property which are inconsistent with relevant values.'		
A Conservation Agreement (CA) has been established between the Commonwealth Minister for the Environment, NSW Minister for Planning, and the Parramatta City Council under Section 305 of the EPBC Act, 1999. The agreement seeks to protect the and conserve:		
a. The World heritage values of a declared World Heritage property in the Australian jurisdiction; and		
b. The National values of a National Heritage place.		
The CA outlined controls in respect of Development on land within the Highly Sensitive Area (as the site is) and notes that '...these provisions comprise the Highly Sensitive Area Controls for the purposes of this Agreement despite any inconsistency with an environmental planning instrument applying to the Highly Sensitive Area and despite an subsequent amendment or repeal of the specified provisions of the Parramatta City Centre Local Environmental Plan 2007 or the Parramatta Development Control Plan 2011.' (p.6)		
Pursuant to section 306A of the EPBC Act, action in the Class of Actions does not require approval under Part 9 of the EPBC Act Specified Part 3 Provisions		
Highly Sensitive Area Controls		Responsiveness of the PLC Hotel proposal
a	The maximum building height shown for the land on the Height of Buildings Map pursuant to clause 21 of the Parramatta City Centre Local Environmental Plan 2007 in the form it was in as at 18 June 2015	<p>The PCC LEP 2007 clause 21 does not stipulate a maximum building height for the nominated 'highly sensitive site' A1, the subject development site. It is noted that the PCC LEP 2017 has since been repealed and replaced by the PLEP 2011. The current LEP similarly contains no maximum height standard for the subject site.</p> <p>The overall height (RL 75.0m) of the proposal mediates between the stadium height and the permissible development height to the north of the site (PLEP Height Map Site reference AA2), which is up to 66m. The set back from O'Connell Street responds to the surrounding height limits of the street frontages of 9m (PLEP Height Map Site references J1)</p>
b	The maximum floor space ratio shown for the land on the Floor Space Ration Map and pursuant to clause 22 of the Parramatta City Centre Local Environmental Plan 2007 in the form it was in as at 18 June 2015	The PCC LEP 2007 clause 22 does not stipulate a FSR for the nominated 'highly sensitive site' A1, the subject development site. It is noted that the PCC LEP 2017 has since been repealed and replaced by the PLEP 2011. The current LEP similarly contains no maximum height standard for the subject site.
c	Clause 21A of the Parramatta City Centre Local Environmental Plan 2007 in the form it was in as at 18 June 2015	<p>As the PCC LEP 2007 clause 21 does not stipulate a maximum building height for the nominated 'highly sensitive site' A1, the subject development site. The consideration is 21A (2) as follows:</p> <p>Development consent must not be granted to any such development unless the consent authority is satisfied that:</p> <p>(a) The architectural roof feature:</p> <p>i. Comprises a decorative element on the uppermost portion of a building, and</p> <p>ii. Is not an advertising structure, and</p> <p>iii. Does not include floor space area and is not reasonably capable of modification to include floor space area, and</p> <p>iv. Will cause minimal overshadowing, and</p> <p>(b) Any building identification signage or equipment for servicing the building (such as plant, lift motor rooms, fire stairs and the like, contained in or supported by the roof feature is fully integrated into the design of the roof feature</p> <p>It is not considered that this Clause is applicable, as architectural roof features only apply as an exception to allow a building height to exceed the height limit in the LEP. In this case, the height limit is not being exceeded. In addition it is noted that the design intent is to integrate and conceal plant areas.</p>

d	<p>Section 4.3.3.7 c) of the Parramatta Development Control Plan 2011 in respect of the 'Park Edge' special area, in the form it was as at 18 June 2015</p> <p>NOTE: The Controls to Site A1 apply as follows:</p> <p>(a) At least 80% of the building height must be contained below the level of the surrounding established tree canopy of Parramatta Park when viewed from any of the key viewing locations from OGH shown in Figure 4.3.3.7.7. Any building elements must be oriented so as to minimise the visual impact from these viewing locations.</p> <p>(b) External building materials must be muted in colour with matt finishes to minimise contrast with the park surrounds and be complementary to its setting.</p> <p>(c) Signage on the upper level of the buildings must not face the Domain of Parramatta Park</p>	<p>Views 2 and 5 of the DCP Figure 4.3.3.7.7 are subject the Area A1a control regarding building height. These views correlate with views 3 and 10 (respectively) of the Technical Guide, and are modeled on pages 14, 16 and 17 of this report. This modeling indicates that at least 80% of the proposed building height is contained below the level of the surrounding established tree canopy of Parramatta Park. The proposal complies with this control.</p> <p>External building materials will be selected in consideration of the controls for Site A1 relating to colour and finish to ensure they remain complementary to the setting. It is confirmed that the proposal does not include upper level signage facing the Domain of Parramatta Park</p>
e	i) Involves the erection of a new building or external alterations to an existing building; and	The proposal involves the erection of a new building. Nil response required.
	ii) Is the winner of a competitive design process, being an architectural design competition carried out in accordance with procedures approved by the Secretary of the NSW Department of Planning and Environment; and	Not applicable. The site is outside the City Centre provisions of the Parramatta DCP 2011 and the competitive design processed within Parramatta LEP 2011, and no architectural design competition is required.
	iii) Is consistent with the essential future development guidelines for the 'Park Edge' area set out in the report Development in Parramatta City and the Impact on Old Government House and Domain's World and National Heritage Listed Values: Technical Report (Planisphere, 2012) – 'a building height that exceeds the maximum height shown for the land on the Height of Buildings Map, or on amount of floor space that exceeds the maximum floor space ration shown for the land on the Floor Space Ration Map (or both) by up to 15%'	Refer to 5.2.5

5.2.3 ASSESSMENT AGAINST: PARRAMATTA LOCAL ENVIRONMENT PLAN 2011		
The site falls within the area subject to the Parramatta LEP 2011. It sits adjacent to a Heritage Conservation Area, to the opposite side of O'Connell Street. It also sits within Zone RE1 Public Recreation, with the Objectives of the zone including the conservation, enhancement and promotion of the natural assets and cultural heritage significance of Parramatta Park. The heritage objectives of this legislation, are defined as follows:		
5.10 Heritage Conservation		Responsiveness of the PLC Hotel proposal
a	to conserve the environmental heritage of Parramatta	Not applicable
b	to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views	The proposed development is not situated within a Heritage Conservation Area, but seeks to respond to its setting and context. The potential impact to views is assessed through this report.
c	to conserve archaeological sites; and	Assessed by others.
d	to conserve Aboriginal objects and aboriginal places of heritage significance.	Assessed by others.

STATEMENT OF HERITAGE AND VISUAL ANALYSIS

5.2.4 ASSESSMENT AGAINST: PARRAMATTA DEVELOPMENT CONTROL PLAN 2011		
NOTE: With reference to Clause 4.3.3.4 Significant view corridors from within Parramatta Regional Park. The site falls within the Park Edge (Highly sensitive) zone (Figure 4.3.3.7.6, p.89) the definition and identification of which is also contained within the OGH D Technical Guide, prepared by Planisphere 2012. Refer to the visual impact assessment prepared in accordance with the Conservation Agreement for the protection of Works and National Heritage values of the Australian Convict Sites, Old Government House and Domain, Parramatta, including the Technical Report prepared by Planisphere, 2012 and the Essential and Desirable Development Guidelines in the following table.		
Objectives		Responsiveness of the PLC Hotel proposal
O.2	Retention and reinforcement of the attributes that contribute to the heritage significance of items, areas and their settings	While it could not be stated that the proposal reinforces the heritage significance of the area and its setting it is considered to have no direct impact to the OGH D and PNHS sites and only minor adverse impact to their setting, when viewed from a limited number of the significant viewpoints.
O.3	Maintenance and improvement to residential amenity and open space areas	Not applicable
O.4	Development that is compatible with the significance and character of the area	The development is compatible with the long standing association of public leisure and the social significance associated with this aspect of Parramatta Park.
C.3	Development near Heritage Items - Where development is proposed that adjoins a heritage item identified within the Parramatta LEP 2011 or Parramatta City Centre LEP 2007, the building height and setbacks must have regard to and respect the value of that heritage item and its setting	The PCC LEP 2007 clause 21 does not stipulate a maximum building height for the nominated 'highly sensitive site' A1, the subject development site. It is noted that the PCC LEP 2007 has since been repealed and replaced by the PLEP 2011. The current LEP similarly contains no maximum height standard for the subject site. Notwithstanding this the proposal has been development in consideration of the potential visual impacts to OGH D and the PNHS.
C.11	New Buildings – New buildings will need to respect and acknowledge the existing historic townscape of Parramatta so that new and old can benefit from each other	The proposal represents a contemporary design response within an emerging urban landscape, mixed within a historic landscape. The design of the building responds to the design guidelines applicable to the site and considers best practice guidelines for design within heritage context.
C.12	Applicants need to concentrate on getting the height, sitting, shape and materials right so that new buildings will blend with old areas without imitation of period details, including consideration of: <ul style="list-style-type: none">The height of the new building compared to those nearby – the new building should be no higher than the majority of the buildings in the vicinityThe setback of the new building from the street and from its side and rear boundaries and as compared to its neighbours on either sideWhether the building materials of the new building complement those nearby – most houses in Parramatta are of brick or weatherboard so bagged and painted brick walls might not be suitable for new buildings nearby	<p>The PCC LEP 2007 clause 21 does not stipulate a maximum building height for the nominated 'highly sensitive site' A1, the subject development site. It is noted that the PCC LEP 2007 has since been repealed and replaced by the PLEP 2011. The current LEP similarly contains no maximum height standard for the subject site.</p> <p>The overall height of the proposal (RL 75.0m) mediates between the stadium height and the permissible development height to the north of the site (PLEP Height Map Site reference AA2), which is up to 66m. The set back from O'Connell Street responds to the surrounding height limits of the street frontages of 9m (PLEP Height Map Site references J1).</p> <p>The proposed materials are contemporary with the development and that of the adjacent stadium. Their final selection will seek an appropriate contrast to the materials of the adjacent heritage conservation areas without detracting from the character and significance of those areas.</p>
4.3.3.4	Significant view corridors from within Parramatta Regional Park. Maintain and enhance views between the city centre and historically significant features.	The potential impact of the proposal to the maintenance and enhancement of historically significant views is assessed as part of this HVIA. The proposal is considered to present a minor adverse impact and is comparable to recent and proposed development to adjacent sites.

5.2.5 ASSESSMENT AGAINST: CONSERVATION AGREEMENT FOR THE PROTECTION OF WORKS AND NATIONAL HERITAGE VALUES OF THE AUSTRALIAN CONVICT SITES, OLD GOVERNMENT HOUSE AND DOMAIN, PARRAMATTA, INCLUDING THE TECHNICAL REPORT PREPARED BY PLANISPHERE, 2012		
Essential Future Development Guidelines		Responsiveness of the PLC Hotel proposal
A1	Apply the design excellence provisions of the Parramatta City Centre LEP 2007 to all new developments in this location.	The site is outside the City Centre provisions of the PCC LEP 2007, the current DCP 2011, and the competitive design processes within the current Parramatta LEP 2011, and no architectural design competition is required. This is addressed within the design excellence provisions within the SEARs and the subsequent processes
A2	The form, bulk and massing of new buildings must not visually dominate the setting of Old Government House when viewed from within the Domain Parklands. This can be achieved by ensuring that new built form retains a sense of openness and sky between buildings, and does not result in a 'wall' of development when viewed from within the domain, by:	The footprint of the tower (of approximately 1000 sqm) is relatively small and this represents a minor percentage of the Leagues Club site (43%).
A2.1	Ensuring that the upper levels of towers that are visible above the established tree canopy of the Domain Parklands, are narrower and /or more slender in form than the lower levels;	The tower of the development tapers and reduces in floor area in response to the Development Guidelines.
A2.2	ensuring that buildings are designed so that the side of towers facing the Domain is no wider than 30m; and,	The hotel tower has been folded in response to site planning constraints and to reduce the area of façade directly fronting the parkland. The tower form is set back from the pedestrianised path that links O'Connell Street to Little Coogee, providing a human scale interface with the park edge. The shape of the tower provides opportunity for considered articulation of the two wings of the building, which will reduce the overall visual impact as it does not present a long continuous flat façade in any direction. The overall massing strategy is in line with the Parramatta Leagues Club Master Plan which guides development to steps down lower towards the parkland sides with higher forms adjacent the existing Leagues Club Building to ensure reduced visual impact, maintain solar access and present a lower human scale to the parkland areas.
A2.3	utilising materials and external finishes that reduce distant visibility against the sky (such as light colours, glass and reflective surfaces).	Considerable attention will be dedicated to ensuring the design of the tower minimises the bulk and mass visible above the tree-line. The selection of materials and colours will reference the surrounding parklands using matt finishes and muted tone to create a sympathetic dialogue between the proposed Hotel and the heritage parklands.
A3	Views between Old Government House and the following historic landmarks must be retained: Old Kings School, Old Government Farm, and St Patrick's Cathedral, by;	The proposed development site does not fall within the vistas to these historic landmarks.
A3.1	ensuring that new buildings do not block the sightlines between Old Government House and the historic buildings as depicted in Important View 3 (see p.89).	The subject site falls outside of Important View 3, as is represented through the visual modeling Section 5.1.2, page 14 of this Preliminary Assessment Report.
A4	Any new development on the current RSL building site must respect the heritage values of its setting and its inclusion within the World Heritage Buffer Zone, and create a positive interface between the Domain and the city. This can be achieved by ensuring that any building:	The subject site falls outside of the Parramatta RSL building site. The Guidelines of A4 are therefore not applicable.
A4.1	addresses both its street frontages, as well as the Domain parklands;	
A4.2	concentrates development bulk towards O'Connell Street;	
A4.3	utilises external colours and finishes that immerse the building within its setting and minimise contrast with the surrounds (such as muted colours and matte finishes); and,	
A4.4	is designed to the highest contemporary architectural standards.	

STATEMENT OF HERITAGE AND VISUAL ANALYSIS

Desirable Future Development Guidelines		Responsiveness of the PLC Hotel proposal
B1	New development between O'Connell and Marsden Streets to the north of George Street should retain and enhance the views of the river bank and environs from the Domain, particularly when viewed from the north west lawn of Old Government House (refer to Important Views 3 and 8) and provide a positive interface with the river. This may be achieved by ensuring that any building:	The subject site sits outside of this zone.The Guidelines of B1 are therefore not applicable.
B1.1	addresses the river as well as any street frontage(s);	
B1.2	provides a positive, active interface at pedestrian level, with the public space / promenade adjacent to the river; and,	
B1.3	is designed to the highest contemporary architectural standards.	
B2	New development fronting O'Connell Street should improve the visual and physical connection between the Domain and the city by:	It is a key design aspect of the proposal to assist with pedestrian connectivity between the stadium environs, the park, the club and north Parramatta developments.The proposal responds accordingly to this objective.
B2.1	creating a pedestrian friendly environment; and,	
B2.2	a consistent, 'human scaled' and active built form frontage along the street.	
B3	New development in George Street should strengthen and frame the vista along the street and further reinforce the formal Georgian town plan.This concept is outlined within the City Centre DCP and includes:	
B3.1	consistent setbacks (including consistent front setbacks at street level); and	The subject site sits outside of this zone.The Guidelines of B3 are therefore not applicable.
B3.2	no building facade clutter (including signage), particularly below first floor level is also desirable.	
B4	New development throughout the city centre area should reinforce the formal layout of the Georgian town plan with:	
B4.1	consistent setbacks (including continuous front setbacks at street level); and	
B4.2	orientation of buildings towards the street grid	The subject site sits outside of this zone.The Guidelines of B4 are therefore not applicable.
B5	The majority 'green' aspect when looking north and north east from within the domain parklands should be retained such that the tree lined ridge which forms the background to views remains mostly intact. This may be achieved by :	
B5.1	Ensuring that the majority of new developments are lower in height than the tree lined ridge when viewed from within the Domain;	
B5.2	Utilising materials and external finishes that reduce distant visibility and minimise contrast against the green backdrop such as matt finishes and muted tones; and,	
B5.3	Ensuring that the tops of towers are well designed and do not display advertising materials or banners.	Signage elements will not be located on top of the building nor facing the parklands to minimize impact to the parklands. Signage will be maintained at a low level facing away from the parkland areas. Consideration will be made as to the location, size and expression of these to reduce the presence of these elements in the surrounding urban fabric as well. The tower design will be guided by a series of site specific design principles with consideration for the visual impact of the tower on surrounding areas, including how it 'finishes' at the top. It is the intention to have the majority of the top floor habitable with a mid-level plant area so visually it is not 'crowned' by a plant room or visible plant equipment.Any roof top plant will be screened visually.

5.2.6 ASSESSMENT AGAINST: NATIONAL HERITAGE MANAGEMENT PRINCIPLES

The development sits adjacent to the OGHD and PNHS, both listed on the National Heritage List..While the development does not propose work within the NHL areas an assessment against the National Heritage Management Principles associated with the EPBC Act is provided within this table.

Assessment against: *National Heritage Management Principles*

Principles		Responsiveness of the PLC Hotel proposal
1	The objective in managing National Heritage places is to identify, protect, conserve, present and transmit, to all generations, their National Heritage values.	The proposal recognises the National HeritageValues of the OGHD and PNHS. The objectives, guidelines and controls established to protect and enhance these values have been considered throughout design development to ensure that the proposal is responsive to its context and setting without adverse impact to the significance and integrity of these values.
2	The management of National Heritage places should use the best available knowledge, skills and standards for those places, and include ongoing technical and community input to decisions and actions that may have a significant impact on their National Heritage values. AUSTRALIA'S NATIONAL HERITAGE www.heritage.gov.au	
3	The management of National Heritage places should respect all heritage values and seek to integrate, where appropriate, any Commonwealth, state, territory and local government responsibilities for those places.	
4	The management of National Heritage places should ensure that their use and presentation is consistent with the conservation of their National Heritage values.	
5	The management of National Heritage places should make timely and appropriate provision for community involvement, especially by people who: (a) have a particular interest in, or associations with, the place, and (b) may be affected by the management of the place.	
6	Indigenous people are the primary source of information on the value of their heritage and the active participation of Indigenous people in identification, assessment and management is integral to the effective protection of Indigenous heritage values.	
7	The management of National Heritage places should provide for regular monitoring, review and reporting on the conservation of National Heritage values.	

5.2.7 ASSESSMENT AGAINST: OLD GOVERNMENT HOUSE AND DOMAIN MANAGEMENT PLAN 2008

Assessment against: *Old Government House and Domain Management Plan 2008*

Policy		Responsiveness of the PLC Hotel proposal
8.2.1	New Structures, either permanent or temporary will not be constructed where they will have a detrimental affect on significant views.	The visual modeling undertaken as part of this Preliminary Assessment demonstrates that the proposal will have a minor, but not detrimental impact to the significant views of OGHD.
8.2.1	Retain vistas of the House from within the Park. Retain vistas from the house to the east and north.	The proposal does not impact on the vistas from OGH to the east and north and sits outside of the view cones ofViews 1, 1B and 3 of the Technical Guide.
8.2.1.4	Do not permit large scale development adjacent to or within the Park. Retain vistas from the House to the east and north.	While the development sits on the boundary of the buffer zone it is situated outside of the Park and retains vistas from the House to the east and north.The site does not fall within the significant view cones ofViews 1, 1B and 3 of the Technical Guide, modeling of the views on page 14 indicate that the retention of views and vistas from OGH to the north.
8.2.1.4	Parramatta Park Trust will work with Parramatta and Holroyd Council's and other authorities to ensure that developments along the Park boundaries do not detract from significant views from within the Park.	The Technical Guide notes that 'A number of views and issues mentioned within this document will not be affected by development outside of the buffer zone.' (p.109)

STATEMENT OF HERITAGE AND VISUAL ANALYSIS

5.2.8 ASSESSMENT AGAINST: PARRAMATTA NORTH HISTORIC SITES CONSOLIDATED CONSERVATION MANAGEMENT PLAN, PREPARED BY TKD ARCHITECTS, DATED MARCH 2017.

The key objective of the Consolidates Conservation Management Plan is to facilitate the sustainable management of the heritage values of the Parramatta North Historic Sites. (PNHS CMP, prepared by TKD Architects, 2017, p.i)

The projects SEARS requires the assessment of the proposal, subject of this report against the policies and guidelines of the Consolidated CMP.

The CMP principally addresses the items within the boundary of the PNHS, rather than development in its vicinity.The CMP does however identify significant views and vistas to the PNHS and natural values for retention, conservation and enhancement.

The relevant polices, and the responsiveness of the PLC Hotel development are summarised below.

Policies and Guidelines		Responsiveness of the PLC Hotel proposal
14.1	Proposals within the PNHS will retain, conserve and enhance significant historical relationships, building curtilages and settings, views and vistas <ul style="list-style-type: none">Significant views and vistas to, from and within the PNHS should be retained conserved and enhanced, where possible, by sympathetic management of plantings and appropriate location of new development and landscaping.	The proposal falls outside the PNHS boundary.The CMP notes that control of development outside the PNHS boundary to minimise impacts is important but beyond the scope of the PNHS CMP. Existing landscape plantings provide substantial screening of the PNHS from the subject development site.The proposal is responsive to its heritage context and setting and does not present an immediate impact to the setting, context and values of the PNHS.

5.3.9 ASSESSMENT: STATEMENT OF HERITAGE IMPACT

The following Statement of Heritage Impact is based on the Heritage Council of NSW format and seeks to assess the potential impacts to built heritage items, and to the visual context and setting of the subject site:

1	How is the impact of the new development on the heritage significance of the item or area to be minimised?	The impact of the new development on the heritage significance of the area has been minimised through careful consideration of the overall envelope and the modularisation of its façade.This reduces the potential visual impact of a greater massing of the façade when viewed from any one location. Impacts will be further minimised through careful selection of materials through design development, together with complementary landscaping.
2	Why is the new development required to be adjacent to a heritage item?	The new development supports the adjacent Parramatta Leagues Club Stadium and adjacent Club which have long associations with the wider site.
3	How does the curtilage allowed around the heritage item contribute to the retention of its heritage significance?	The proposed development sits outside of the listed curtilage of any of the State or Locally listed items or Conservation Areas within the vicinity of the site.While the site sits outside of the buffer zone and curtilage of the OGHG as identified in Section 3.2 of this assessment.
4	How does the new development affect views to, and from, the heritage item? What has been done to minimise negative effects?	The views analysis within this assessment would indicate that the proposal does not present significant impact to the views subject to the Park Edge Highly Sensitive Zone Site A1 of the Technical Guide forming part of the Conservation Agreement. Additional studies indicate that views from the adjacent Norma Parker Centre will not present a significant impact to the visual setting and context of the PNHS.
5	Is the development sited on any known, or potentially significant archaeological deposits? If so, have alternative sites been considered? Why were they rejected?	The impact on any known or potentially significant archaeological deposits is being assessed by Austral separately
6	Is the new development sympathetic to the heritage item? In what way (e.g. form, siting, proportions, design)?	The proposal seeks to mitigate its impact to the adjacent heritage items as is outlined in 5.3.9.1.
7	Will the additions visually dominate the heritage item? How has this been minimised?	The proposal will not visually dominate the site of the OGHG or adjacent PNHS. The proposal will dominate the adjacent Ross Street Gatehouse, an item on the PPT's s.170 Heritage and Conservation Register.It is noted that the historic setting of the Gatehouse, adjacent Roseneath Cottage and the Conservation Area in which its sits is compromised and within an area of development growth consistent with the scale of the proposed PLC Hotel development
8	Will the public, and users of the item, still be able to view and appreciate its significance?	The proposal presents no impact to the ongoing operations or current public access of the adjacent heritage items.

6 ASSESSMENT OF POTENTIAL HERITAGE IMPACT

The site of the proposed hotel development sits outside of the listed curtilage and the Buffer Zone of the Old Government House and Domain, one of the 11 properties forming part of the World Heritage Australian Convict Sites Listing. It is identified as site A1 within the Parramatta DCP 2011 and falls within the highly sensitive zone established by the Development in Parramatta Technical Guide, prepared by Planisphere, 2012. Both the DCP and Technical Guide form part of the Federal Environment Minister's *Conservation Agreement for the protection and conservation of the World Heritage Values and National Heritage Values of the Australian Convict Sites, Old Government House and Domain, Parramatta, New South Wales*, executed 23 December 2015.

The site is not subject to height or FSR controls as outlined within the Annexures of the Conservation Agreement, and its referenced planning controls.The site does not fall within an SHR boundary and as such is not subject to the provisions of the NSW Heritage Act, 1977 (with the exception of archaeological considerations which are beyond the terms of reference for this report). In addition that site is not listed within the LEP or located within a Conservation Area.

The potential impacts of the proposal to the OUVs of OGHG and the adjacent sites of National, State and Local significance has been assessed through visual analysis, specifically those sites within the Technical Guide which have a view cone falling to the subject site, relevant sites of Figure 4.3.3.7.7 of the DCP and views directly from OGH.The potential impact of the proposal has also been considered with reference to the significant views of the PNHS CMP, specifically with relation to the Norma Parker Centre, and Parramatta Female Factory and Institutions Precinct. It is noted that the preliminary visual impact analysis has taken into account the potential for the proposal to contribute to cumulative impacts to World and National values by the including the modelling of current and approved developments relevant to the views analysis.

The visual impact analysis of this assessment indicates that the proposed development does not present significant impact to the National and OUVs of OGHG, one of the 11 properties forming part of the World Heritage Listed Australian Convict Sites Listing, nor to the National Heritage Values of the Parramatta Female Factory and Institutions Precinct. It does not present a significant impact to the landscape setting, visual prominence and values of the sites.

The proposal responds to the essential development guidelines of the *Technical Guide* relevant to the site (see Section 5.2.5).The proposal is consistent with the scale of adjacent development (existing, proposed and approved) and retains a sense of openness and sky between buildings as is recommended by the *Technical Guide*.

The self-assessment process of the EPBC Act referral process has been undertaken. It is considered that the potential visual and associated impact of the proposal is below the World Heritage Properties significant impact criteria¹³ and National Heritage places significant impact criteria¹⁴ and does not pose a real chance or possibility that the proposal will cause:

- one or more of the World Heritage values to be lost
- one or more of the World Heritage values to be degraded or damaged, or
- one or more of the World Heritage values to be notably altered, modified obscured or diminished

On balance this assessment concludes that the proposed hotel development does not present a significant impact to the values of the adjacent significant items, while noting the impacts to the context and setting of the Ross Street Gatehouse which is considered to be substantially compromised in its current presentation.

¹³ Matters of National Environmental Significance – Significant impact guidelines 1.1 EPBC Act 1999, Commonwealth of Australia, 2013, p.16

¹⁴ Ibid, p.19

STATEMENT OF HERITAGE AND VISUAL ANALYSIS

ANNEXURES

A AUSTRALIAN CONVICT SITES STATEMENT OF OUTSTANDING UNIVERSAL VALUES

The full citation for the Australian Convict Sites can be found at the following link

<http://environment.gov.au/heritage/places/world/convict-sites/values>

B PARRAMATTA PARK AND OLD GOVERNMENT HOUSE AND DOMAIN –STATEMENTS OF SIGNIFICANCE

B.1 National Heritage Listing

The full citation for the National Heritage Listing can be sourced from the following link http://www.environment.gov.au/cgi-bin/ahdb/search.pl?mode=-place_detail;place_id=105957

B.1 State Heritage Register

The full citation for the State Heritage Listing can be sourced from the following link

<http://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=5051462>

C ROSS STREET GATEHOUSE - S.170 HERITAGE AND CONSERVATION REGISTER LISTING

The full citation for the State Heritage Inventory can be sourced from the following link

<http://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=4681073>

D ROSENEATH COTTAGE - STATE HERITAGE REGISTER LISTING EXTRACT

The full citation for the State Heritage Listing can be sourced from the following link

<http://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=5045134>

E NORMA PARKER CORRECTIONAL CENTRE

The full citation for the State Heritage Listing can be sourced from the following link

<http://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=5012148>

F CUMERLAND DISTRICT HOSPITAL GROUP - STATE HERITAGE REGISTER LISTING EXTRACT

The full citation for the State Heritage Listing can be sourced from the following link

<http://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=5051959>

G PARRAMATTA CORRECTIONAL CENTRE

The full citation for the State Heritage Listing can be sourced from the following link

<http://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=5000657>

H PARRAMATTA FEMALE FACTORY AND INSTITUTIONS PRECINCT

The full citation for the National Heritage Listing can be sourced from the following link

<http://environment.gov.au/heritage/places/national/parramatta-female-factory-and-institutions-precinct>

