

DOC18/970626

Mr Robert Cologna
Team Leader Land Use Planning
Parramatta City Council
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Attention: Felicity Roberts (FRoberts@cityofparramatta.nsw.gov.au)

Dear Mr Cologna

**AMENDMENT TO PARRAMATTA LOCAL ENVIRONMENTAL PLAN 2011 AND SITE SPECIFIC
DRAFT DEVELOPMENT CONTROL PLAN FOR 20-22 MACQUARIE STREET, PARRAMATTA**

Thank you for your letter of 12 December 2018 inviting comment on the amendment to *Parramatta Local Environmental Plan 2011* (LEP) and the draft Development Control Plan (DCP) for 20- 22 Macquarie Street, Parramatta. We understand that the proposed amendment seeks to:

- Amend the LEP to increase the maximum floor space ratio (FSR) from 4:1 to 10:1 and increased the maximum building height from 36m to 90.5m and add site specific controls.

The design concept for the site involves a mixed-use development incorporating a 14m high or a three storey-podium (whichever is higher) with a multiple storey tower.

As you may be aware, 20-22 Macquarie Street, Parramatta, is not listed on the State Heritage Register (SHR), nor as a local heritage item in Schedule 5 of the *Parramatta Local Environmental Plan 2011* and it is not within a conservation area.

The subject site is within the vicinity of a number of SHR items including:

- The Red Coats Mess House, Horwood Place (SHR 00218)
- St John's Anglican Cathedral (SHR 01805)
- Parramatta District Hospital Brislington (SHR 00059)
- Parramatta Park and Old Government House (SHR 00596)

The site is within the immediate vicinity of 197 Church Street, Parramatta which is listed on the schedule 5 of the LEP. 20-22 Macquarie Street is also within the vicinity of a number of other locally listed items.

Old Government House and the Government Domain are also in the National Heritage List and inscribed on World Heritage List.

The following recommendations are made with respect to SHR items in the vicinity of the subject site (excluding Old Government House and Government Domain):

- The proposed development is unlikely to have any physical impact on State heritage values, as the site is separated by distance and intervening development from SHR items;
- However, there is potential for the development to impact on the visual setting of SHR items in the vicinity. The Heritage Impact Statement (HIS) should identify and address the visual impact of the proposed development to heritage items in the vicinity (including local and SHR items). Photomontages should be provided.

In relation to Old Government House and Government Domain (OGHD):

- The site is located within the designated Sensitive Area for visual impact as identified in the *Development in Parramatta City and the Impact on Old Government House and Domain's World and National Heritage Listed Values Technical Report 2012* (Planisphere report);
- The indicative design concept does not address the impacts to the visual connection to parkland and Georgian town plan requirements of the future development guidelines in the Planisphere report;
- The HIS needs to be updated to include photomontages to provide a clearer understanding of the impact of the insertion of a new element in views and vistas of OGHD. Analysis of the views and vistas should include an assessment of the extent of the impact with a statement indicating how the determination was reached;
- The HIS should address the cumulative impacts of new high-rise development in the CBD that intrudes into significant views of OGHD.

With respect to the existing building on site it is noted that the HIS has not assessed the significance of this building. The HIS states that the building was constructed in the Late 20th Century International Style by notable architects Stafford, Moore and Farrington. Council should satisfy itself as to the significance of this building.

Site Specific Development Control Plan (DCP)

The DCP should include objectives to ensure any redevelopment of the site is sympathetic to adjacent heritage items in terms of massing, scale, setbacks and orientation, details and materials.

Archaeology

It is noted that the subject site is identified in the *Parramatta Historical Archaeological Landscape Management Study* (PHALMS) as Archaeological Management Unit (AMU) #2908 and that the study identified that the subject site had no research potential or archaeological significance. PHALMS is not a detailed archaeological assessment. This site is shown as containing occupation evidence dating from the 1790s and at several following phases (1830s, 1880s and 1900 and redeveloped in part in the 1960s). The HIS in contrast to the PHALMS unit, has identified that the site may retain archaeological potential and significance, as the development of the site may not have fully excavated the allotment in the northern part of the site.

The draft DCP submitted in support of the proposed increased levels of FSR and height at the site has not addressed archaeology. There is no advice about how the increase in these allowances may affect the need for additional basement levels to accommodate onsite parking, or the type of foundations required to facilitate a taller structure.

It is recommended the draft DCP be amended to identify the following:

- **Interpretation:** Interpretation of the site will be established. This must respond to the results of any program of archaeological investigation that occurs to support redevelopment. Interpretation must be supported by the results of the final excavation report documenting the findings at the site;

- **Redesign allowance:** Allowance in the design to be amended to retain and conserve substantially intact archaeology in situ where appropriate, should this evidence be identified during the re-development. This may affect the basement, footing and landscaping designs for the structure; and
- **Resulting archaeological collection:** If during the site's redevelopment an archaeological collection is salvaged/generated, there must be allowance by the developer for either a) a specific room in the new building to house and manage that collection, or alternatively the developer must set aside an amount for the storage of the collection in a long-term capacity by the Parramatta City Council library and heritage collection.

The Voluntary Planning Agreement should include the following long-term commitments by the Developer to manage disturbance of potential archaeological relics:

- The Developer and Council to agree to an amount of funds, set aside for archaeological excavation at the site and the production of a final excavation report.
- The Developer and Council to agree to an amount of funds set aside for the long-term housing and storage of any archaeological collection either within the Parramatta City Council Heritage collection or within the new building.

If you have any questions regarding the above matter please contact Tracy Appel, Senior Heritage Programs Officer, Statewide Programs at the Heritage Division, Office of Environment and Heritage on 02 9873 8559 or tracy.appel@environment.nsw.gov.au.

Yours sincerely



ROCHELLE JOHNSTON
Manager – Statewide Programs
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27 February 2019