

Mr Brett Newman
Chief Executive Officer
City of Parramatta Council
PO Box 32
PARRAMATTA NSW 2124

Attention: Mr Marko Rubcic, Land Use Project Officer, City Strategy
mrubcic@cityofparramatta.nsw.gov.au

Planning Proposal – 163-165 George Street, Parramatta

Dear Mr Newman

Thank you for the opportunity to provide comment on the planning proposal to amend *Parramatta Local Environmental Plan 2011* (LEP) to enable construction of a grand cathedral for St Ioannis Greek Orthodox Church at 163-165 George Street, Parramatta.

We understand that the planning proposal seeks to make the following amendments to your LEP:

- increase the maximum building height from RL 14 to RL 21 for a portion of the site to allow for the construction of a grand cathedral
- insert a subclause that allows the height of buildings control of RL 21 to be exceeded for the purpose of a steeple or similar structure, provided this height is no greater than RL 40, and
- provide an additional permitted use on the site to enable a commercially operated car park.

Although there are no heritage items of State or Local significance on the subject site, the site is immediately adjacent to the State Heritage Register listed 'Ancient Aboriginal and Early Colonial Landscape' (SHR 01863) located at Robin Thomas Reserve, Harris Park. This site is a highly significant cultural landscape which has contributed to an understanding of pre-colonial Aboriginal occupation.

The proposed use and increase in height on the site are likely to result in increased excavation, which is likely to cause disturbance and removal of any rare and significant archaeology which might survive at this location.

Recent test excavation at 155 George Street, Parramatta has confirmed significant archaeological resources, including intact and significant Aboriginal archaeological evidence of the Parramatta Sand Body and evidence of early colonial military occupation.

While review of the Parramatta Historical Archaeological Landscape Management Study (PHALMS) indicates this land allotment has no archaeological potential, these more recent findings near the planning proposal site suggest that the PHALMS assessment may need to be updated.

Heritage NSW requests that Council ask the proponent to prepare a historical archaeological assessment for the site, which meets the Heritage Council Guidelines. This assessment should be prepared by a suitably qualified and experienced historical archaeologist.

Given the Aboriginal archaeology identified above, an Aboriginal archaeological assessment should also be prepared according to *National Parks and Wildlife Act 1974* guidelines, prior to finalisation of the planning proposal.

Undertaking the above assessments now rather than waiting until lodgement of a development application would mean Council could identify these potential remains earlier and would be better able to manage them.

Due to the Aboriginal sensitivity of the site, Heritage NSW recommends the proposal be referred to the Greater Sydney Planning Team (rog.gsrplanning@environment.nsw.gov.au) at the Department of Planning, Industry and Environment for review under the *National Parks and Wildlife Act 1974*, in relation to Aboriginal archaeology.

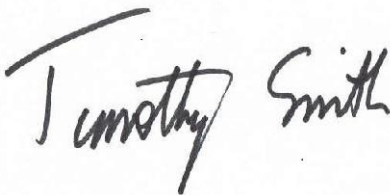
The proposed grand cathedral would occupy a prominent corner location along George and Purchase Streets, in the north-eastern corner of the site. The height increase would be limited to this portion of the site, which would minimise visual impacts to adjacent heritage items to the west.

The current design scheme includes two steeples/domes with a maximum height of RL 34, excluding the spire on the dome. As cathedral steeples are typically narrow in form and do not dominate view corridors, we do not consider that this would have a significant heritage impact. However, further design refinement should aim to minimise overshadowing and visual impacts on nearby State and Local heritage items and Heritage Conservation Areas.

Prior to finalisation of the planning proposal, Council should be satisfied that all necessary due diligence, assessments and notifications have been undertaken.

If you have any questions please contact Stela Razzaque, Senior Heritage Programs Officer, Statewide Programs at Heritage NSW, Department of Premier and Cabinet by phone on 02 9873 8609 or email at stela.razzaque@environment.nsw.gov.au.

Yours sincerely

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

Tim Smith
Director, Heritage Operations
Heritage NSW
As delegate of the Heritage Council of NSW
9 March 2020