

14 March 2023

The General Manager
City of Parramatta
Attn Rachel Machkevitch
Senior Project Officer
Major Projects and Precincts

Email kkirk-torresan@cityofparramatta.nsw.gov.au

Dear Rachel

**DRAFT PLANNING PROPOSAL
45 MACQUARIE ST, PARRAMATTA
ADDITIONAL REQUESTED INFORMATION
REF RZ/7/2022**

Please forgive the long delay in responding to your request to Stratplus, dated 21 December 2022, with regards to a request for further information regarding the Draft Planning Proposal to reduce the extent of the LEP Listed Archaeological Site (A11) at 45 Macquarie St, Parramatta. The site is now commonly known as "V by Crown".

Unfortunately your request, dated 21 December 2022, arrived after the Stratplus' office had closed for the Christmas and New Year period. The request was forwarded to the V by Crown Archaeological Advisory Committee, of which Graham Brooks is a founding and continuing member. Our first reaction has been to refer the request to Dr Edward Higginbotham, the Archaeologist for all the documentary and physical investigations, report preparations, repair and presentation of the remnant archaeology and submissions to Heritage NSW to formally complete the long intended SHR listing. Unfortunately, Dr Higginbotham retired in mid 2021 and confirmed that he was unable to assist in progressing the Draft Planning Proposal.

Consequently, Graham Brooks was requested to respond to the Committee's request. Graham had been the Heritage Adviser on the V by Crown project since its inception, and was familiar with the agreement struck with Heritage NSW to delay a formal SHR gazettal until such time as the retained archaeology was secured and displayed in a defined and completed concrete-walled enclosure at the northern (Macquarie St frontage) of the multilevel basement for the new residential tower.

The extent of the current LEP Listing for A11 is illustrated on LEP Map HER 10. The Draft Planning Proposal seeks to align the LEP mapped area with the now gazetted NSW State heritage Registered Item 2027, "Archaeological site and associated artefacts".

Your letter indicated that the Draft Planning Proposal was reviewed by the City of Parramatta's Heritage Advisory Committee who requested the following information to be referred back to the Committee, when answers could be provided.

The three requests sought by the Heritage Committee were:

1. Provide reasoning to why it is necessary to reduce the existing LEP listing, and additionally, confirm what physical deposits, and what value exists outside the area of the proposed reduced listing



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Incorporated in NSW

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2. Further details are sought to understand the archaeological significance of the remainder of the site with regard to the threshold for local significance as well as State significance.
3. Demonstrate how existing stratification of the site impacts the proposed listing and vice versa.

BACKGROUND TO THE FORMATION OF THE EXISTING ARCHAEOLOGICAL CENTRE

The agreement with Heritage NSW, made before any development permits were issued for the project, that the gazettal could be delayed, was based on a number of factors:

The research undertaken by Dr Higginbotham from at least 2005, had identified and mapped the survival of two major archaeological sites at the northern frontage to Macquarie Street – extensive evidence of an early convict hut with a later overlay of an early 19th century cottage, and the remains of a cellar, known to belong to an early 19th century pub. The extent and condition of these remains made them very rare and without doubt, of State Significance. The only other archaeological relic on the entire V by Crown site was the remains of a well near the south eastern corner of the overall site.

The Heritage NSW Senior Archaeologist and the then Director were fully aware that the archaeological sites were within the footprint of a major new development, and had been aware of the archaeology for some years, when the site was owned by another developer. Heritage NSW had, during that time, negotiated with that developer for a reduced footprint and additional height bonus for the ten proposed development, provided that any tower was set back in a manner that protected the archaeology at the northern end of the site. Thus, Heritage NSW were prepared to negotiate with the new owner, Crown Developments, to facilitate the overall project on the same proviso – the protection and display of the northern archaeology.

The final design of the existing tower was permitted to be above the northern archaeology on the new proviso that the number of major columns potentially likely to impact the archaeology be reduced by 50%. It was this directive that resulted in pairs of the northern façade columns being paired before they hit the ground – hence the V shaped expression that led to the naming identification of the project as “V by Crown”.

The additional requirement of Heritage NSW was that the archaeology remain sitting on virgin ground and be made available for exhibition to the public. From the outset of these discussions, it was realised that areas of the site without archaeological relics of similar significance, could be totally excavated for the required basements.

Heritage NSW also realised that a lot of construction work would be required before the full extent of the retained archaeology could be listed on the NSW SHR. The agreement was eventually completed with the gazetted SHR boundary surrounding the defined archaeology of the two adjacent site, supported by sufficient space for a research workshop, store and public interpretation facilities.

Heritage NSW also agreed with a recommendation from Dr Higginbotham that the remnant well on the south east corner of the overall site was of insufficient value to be retained in-situ.

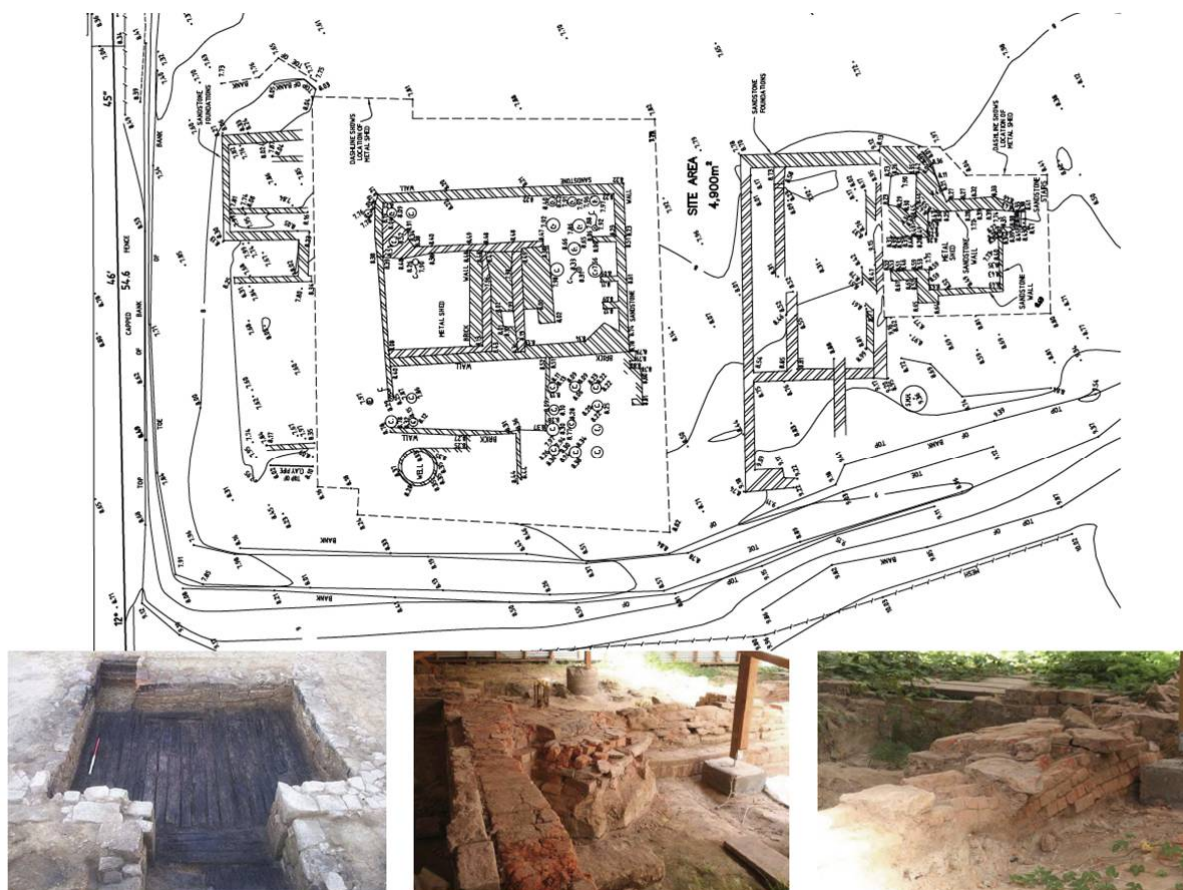
Relevant information to support the above summary is contained overleaf.

EXTRACTS FROM PROJECT DOCUMENTATION THAT DEFINED THE ESHR ARCHAEOLOGY



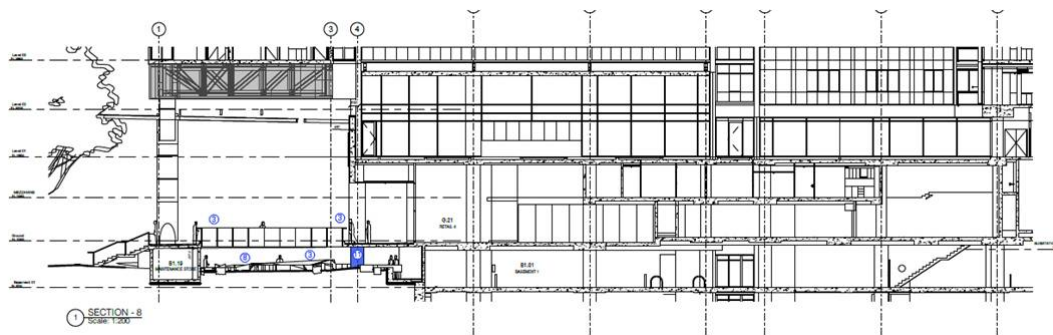
Edward Higginbotham & Associates Pty Ltd, 2005.

2005 photo of the initial archaeological excavation that revealed the archaeological evidence

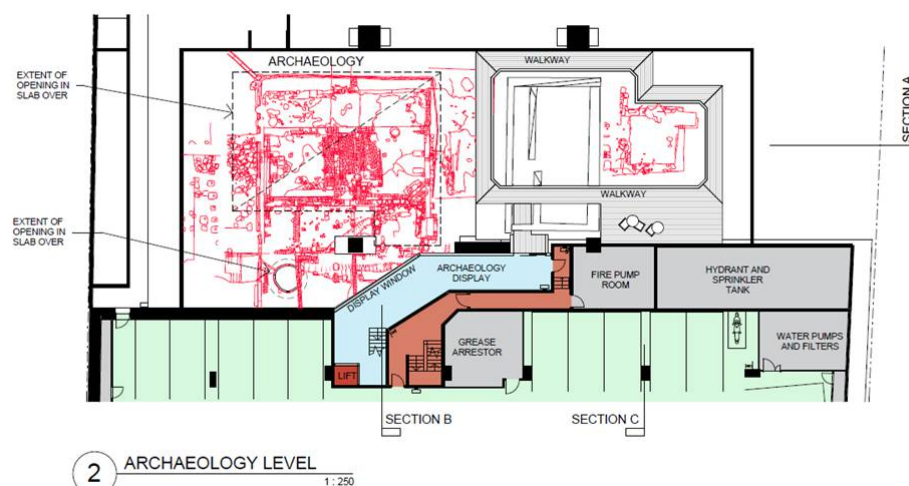


Mapping and detailed photography of archaeological evidence before long term protection when the final development proponent and final proposal were being negotiated.

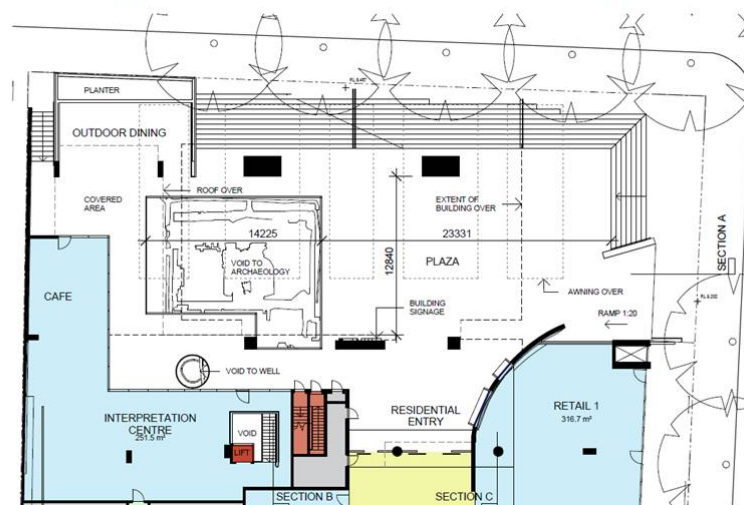
Material on this page drawn from documentation by Edward Higginbotham & Associates



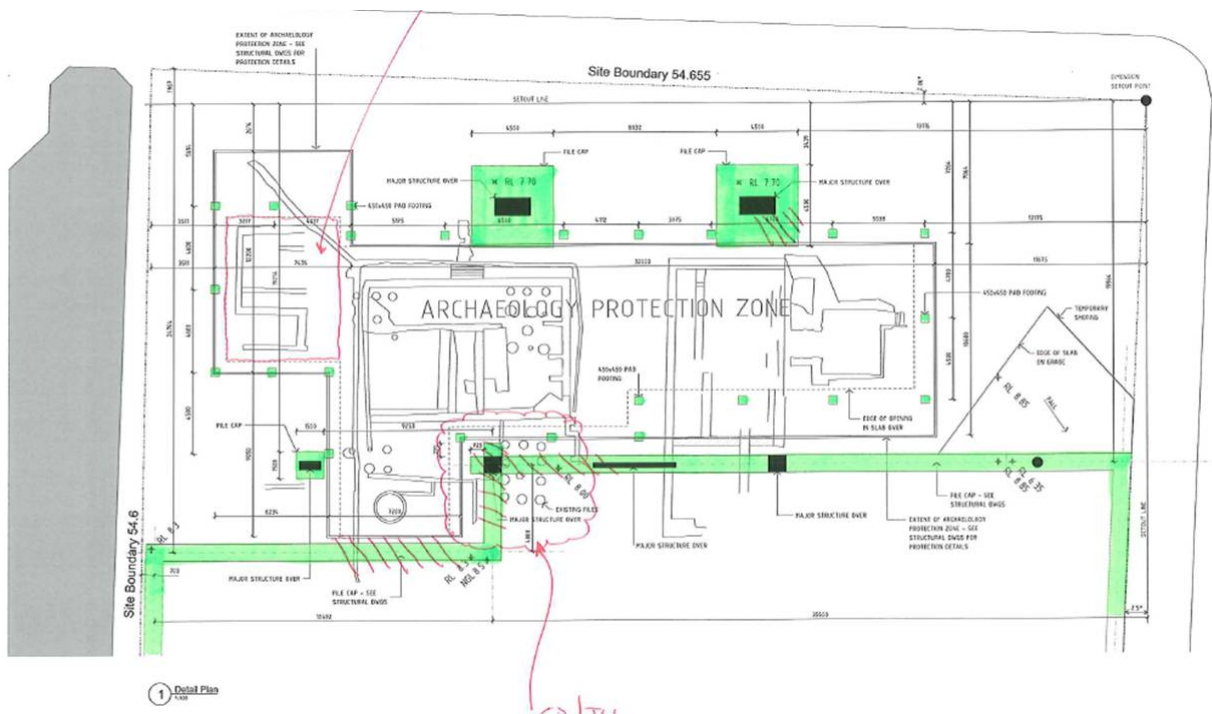
*Architectural section with detailed archaeological display proposal by FRD
Note the excavated depth to accommodate the upper basement level.
Additional basement levels to the right of the retained archaeology are not shown in this extract*



*Initial plan of the Archaeological level.
This layout was ultimately increased to include a conservation workshop plus lift and stair access*



Plan of Macquarie St Plaza level with opening above the major archaeological display



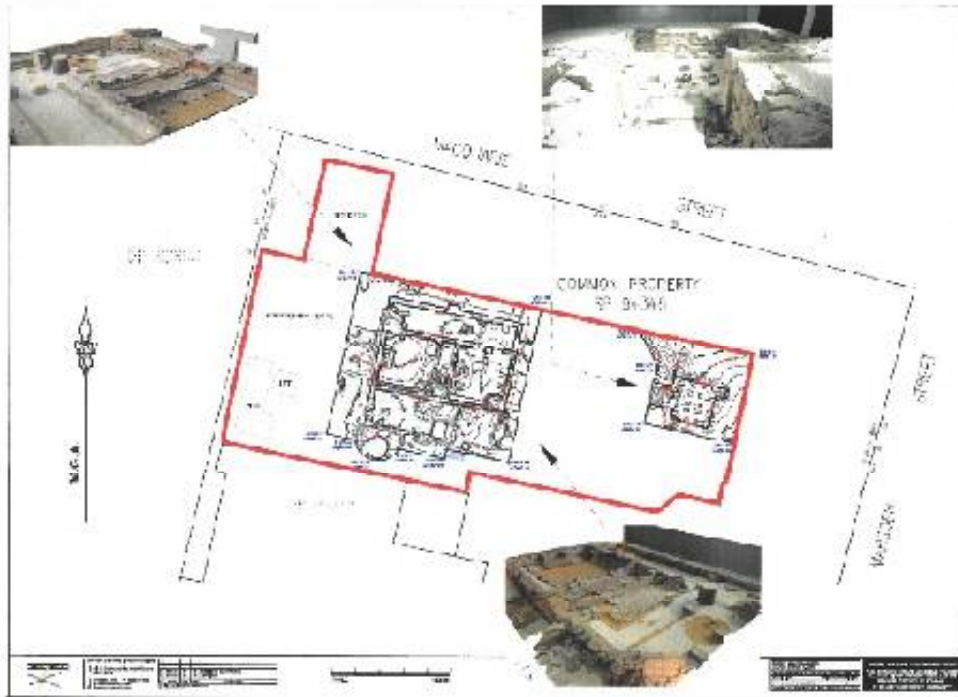
Exploratory architectural plan that led to the reduction of main column footings near the archaeology from four to two, resulting in the V profile of the architectural expression



Indicative sketch of how the basement archaeological display centre would work, with an opening in the Macquarie St plaza



Photos of the completed Archaeological Display Centre



The final SHR boundary to legally and physically protect the state significant archaeology

RESPONSES TO THE REQUESTS FOR MORE INFORMATION

Provide reasoning to why it is necessary to reduce the existing LEP listing, and additionally, confirm what physical deposits, and what value exists outside the area of the proposed reduced listing

Response

The reasoning for reducing the LEP listed area to match the SHR listed area comprises:

- There is no surviving archaeology on the site beyond that now delineated in the SHR curtilage, therefore the additional area of LEP listing is incorrect to the extent that it is now redundant.
- Sound Heritage Management processes need to be based on correct and up to date information.
- The Archaeological Management implications arising from the relevant provisions of the LEP and the NSW Heritage Act, must rely on accurate information.
- The long term management of the building above, with its various common and privately owned strata lots, should be facilitated in a manner that is unencumbered by specific, but potentially redundant and unnecessary development control restrictions that would be generated if the LEP archaeology was not accurately defined.

With regard to the presence and value of any physical archaeological relics outside the SHR listed area, there is no such archaeology surviving, having been removed during the approved excavation for the now existing basements.

Further details are sought to understand the archaeological significance of the remainder of the site with regard to the threshold for local significance as well as State significance.

Response

As discussed above, there is no archaeological significance associated with the remainder of the site.

This fact is confirmed by the location and coverage of the SHR listed area.

Demonstrate how existing stratification of the site impacts the proposed listing and vice versa.

Response

There is no existing stratification remaining on the remainder of the site outside of the SHR listed area.

All of the very important, State Significant Archaeology on the overall V by Crown site at 45 Macquarie St, Parramatta, is contained within the boundary of the SHR listed area. The existing stratification below the retained archaeology has not been disturbed.

Yours faithfully
GBA HERITAGE PTY LTD

A handwritten signature in blue ink, appearing to read 'G. Brooks', with a stylized, flowing script.

Graham Brooks
Director
grahambrooks@gbaheritage.com



GRAHAM BROOKS

Managing Director, GBA Heritage Pty Ltd

Positions Held

Managing Director, GBA Heritage Pty Ltd, 2015 -
Managing Director, Graham Brooks & Associates Pty Ltd, 1996 – 2015
Director, Schwager Brooks and Associates Pty Ltd, 1984 – 1996
Associate Director, Travis Partners, 1977 – 1984
Architect, Pollard Thomas & Edwards, London, 1975 – 1977
Architect, Commonwealth Department of Works, 1972 – 1975

Professional Qualifications

Bachelor of Architecture (Hons), Sydney University, 1972
Master of the Built Environment (B Cons) UNSW 1984
Australian Institute of Architects, 1974
Associate Royal Institute of British Architects, 1975
Registered Architect, New South Wales
Member, Australia ICOMOS

Professional Associations

President ICOMOS International Committee on Cultural Tourism, 2001 – 2011
Chairman, AusHeritage Ltd, 1999-2001
Chairman, National Trust (NSW) Historic Buildings Committee, 1996-1999
Former Heritage Adviser, Liverpool City Council c1995-2005
Member, Senior Advisory Panel, Global Heritage Fund 2010-
Member, National Trust of Australia (NSW) 1973-
Member Australia ICOMOS, 1980-
UNESCO Monitoring Mission to World Heritage Site of Borobudur, 2003, 2006, 2007
World Heritage Centre Monitoring Mission to Ajanta & Ellora Caves, India, 2004-2010
Visiting Professor, Institute of Tourism Studies, Macao, 2006
Former Executive Committee Member, Australia ICOMOS, 1990-1992
Former Member Heritage Council Technical Advisory Committee on Materials Conservation, RAlA Heritage Committee and RAHS Historic Buildings Committee

CAREER SUMMARY

I have worked in the fields of Architectural Design, Heritage Conservation and Cultural Tourism Management for some 45 years, in Australia, the United Kingdom and more recently for UNESCO in Asia. During that period I have conducted heritage assessments and developed heritage management protocols for hundreds of historic buildings and places. My office has conducted hundreds more under my supervision.

I have lectured widely to business, heritage, professional and student groups on heritage assessments, heritage management, conservation practice, preparing heritage sites for cultural tourism and the methodologies of heritage asset management. Since the mid 1980s, I have participated in many appeals before the Land & Environment Court, acting on behalf of both Respondents and Applicants, and have also acted as a Court Appointed Heritage Expert.