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URBIS

HERITAGE IMPACT STATEMENT

38-50 South Street,
Rydalmere NSW 2116

Prepared for

DEXUS PROPERTY SERVICES PTY LIMITED

4 September 2023

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EXECUTIVE SUMMARY

Urbis has been engaged by Dexu Property Services Pty Limited to prepare the following Heritage Impact Statement (HIS) to accompany a Planning Proposal to amend the existing heritage listing for the subject property at 38-50 South Street, Rydalmere (hereafter referred to as the 'subject site').

The site is currently listed as Item 694 under Schedule 5, Part 1 of the *Parramatta Local Environmental Plan (LEP) 2023* as *Truganini House and grounds*, covering the whole of Lot 10, DP 774181.

Based on historical research prepared by Urbis, the existing heritage curtilage does not reflect the original historical curtilage of Truganini House, nor is it considered to reflect the identified significance of the place appropriately.

A detailed historical analysis, curtilage review and impact assessment are included in this report to inform the proposed heritage listing changes within this Planning Proposal. This Planning Proposal seeks consent for statutory changes to the heritage listing for Item No. 694 under Schedule 5 Part 1 of the *Parramatta LEP 2023*. It does not apply for any physical works to be undertaken, and it limited to an administrative application only.

Having regard to the Council's pre-and post-lodgement feedback, and the analysis contained in this report, Urbis propose the following heritage listing amendments in this Planning Proposal:

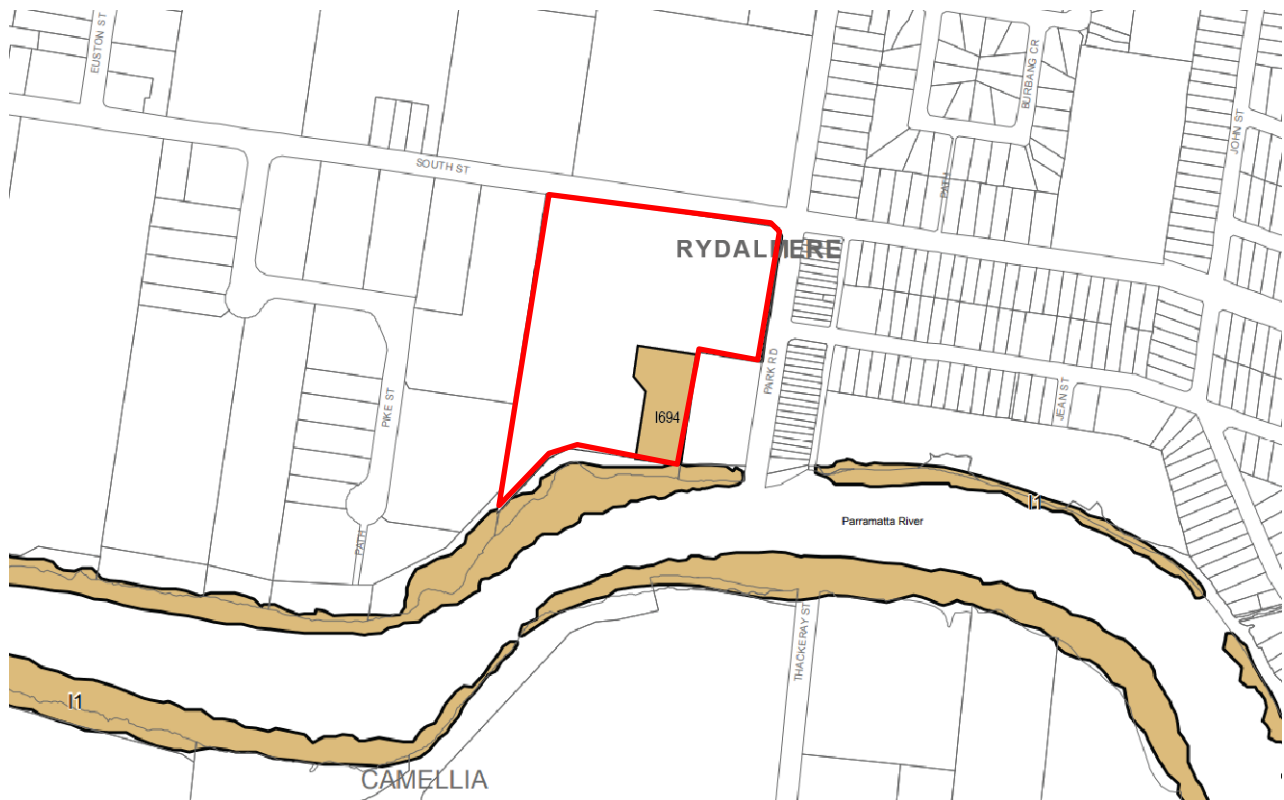


Figure 1 Proposed heritage curtilage to be adopted in the Heritage Map for *Parramatta LEP 2023*, subject site outlined in red.

Source: Urbis

We proposed the following amendments to Schedule 5, Part 1 of the *Parramatta LEP 2023*.

Item No. 694	Item Name	Property Description
Current	Truganini House and grounds	Lot 10, DP 774181
Proposed	Truganini House and riverfront setting	Part Lot 10, DP 774181

Whilst Urbis did disagree in principle with the inclusion of land to the south of the House within the amended curtilage during pre-lodgement feedback, we acknowledge Council's feedback and intent. Accordingly, we have amended the proposed curtilage to balance Council's feedback and the curtilage analysis contained within this report, considering the extent of change being sought to the existing curtilage.

We have excluded the adjacent car parking areas to the north. These areas do not contribute to the significance of the heritage item, nor contribute to Council's intended riverfront connection and inclusion of the cafe.

A detailed curtilage assessment and heritage impact assessment of the proposed works has been undertaken in this report. This Planning Proposal is considered to be the best means of conserving the significance of the place, as it appropriately assesses, acknowledges and legislates the significance of Truganini House.

The Planning Proposal is recommended for approval from a heritage perspective.

1. INTRODUCTION

1.1. BACKGROUND & PURPOSE

Urbis has been engaged by Dexu Property Services Pty Limited to prepare the following Heritage Impact Statement (HIS) to accompany a Planning Proposal to amend the existing heritage listing for the subject property at 38-50 South Street, Rydalmere (hereafter referred to as the 'subject site').

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A detailed historical analysis, curtilage review and impact assessment are included in this report to inform the proposed heritage listing changes within this Planning Proposal. This Planning Proposal seeks consent for statutory changes to the heritage listing for Item No. 694 under Schedule 5 Part 1 of the *Parramatta LEP 2023*. It does not apply for any physical works to be undertaken, and it limited to an administrative application only.

1.2. METHODOLOGY & LIMITATIONS

This HIS has been prepared in accordance with the Heritage NSW guidelines 'Assessing Heritage Significance', and 'Statements of Heritage Impact'. The philosophy and process adopted is that guided by *The Burra Charter: the Australia ICOMOS Charter for Places of Cultural Significance, 2013*.

Site constraints, opportunities and impacts have been considered with reference to the relevant controls and provisions contained within the *Parramatta Local Environmental Plan 2023* (Parramatta LEP) and the *Parramatta Development Control Plan 2023* (Parramatta DCP).

This HIS is limited to the assessment of built heritage impacts of the proposal. It is beyond the scope of this report to assess the archaeological potential of the subject site or assess any potential archaeological impacts as a result of the proposal.

1.3. AUTHOR IDENTIFICATION

The following report has been prepared by Keira Kucharska (Senior Heritage Consultant) and Ashleigh Crisp (Associate Director Heritage). Unless otherwise stated, all drawings, illustrations and photographs are the work of Urbis.

2. SITE DESCRIPTION

2.1. LOCAL CONTEXT

The land to which this Planning Proposal relates to is 38-50 South Street, Rydalmere.

The site is located within the City of Parramatta LGA and is within the Rydalmere industrial precinct, a 104ha industrial precinct characterised by industrial and business uses. It accommodates industrial format buildings in various size, industry, and operation type.

The site is situated within the Rydalmere local centre located to the east of Parramatta CBD. The surrounding local centres in proximity to the Metro Centre include Telopea to the north, Ermington to the east, and Rosehill to the south on the opposite side of the river.

The Precinct has access to Victoria Road, a major road corridor to service the area. In addition, the introduction of the Parramatta Light Rail will further provide connectivity to the precinct, particularly at the Western Sydney University Campus at Rydalmere.

Rydalmere is identified as having one of the largest concentrations of employment lands in the LGA. The City of Parramatta identifies the precinct as a Metropolitan Significant Strategic Employment Lands for industrial uses to cater to the needs of increased employment. Further north of the precinct are areas for low-density, suburban areas.

2.2. SURROUNDING DEVELOPMENT

The immediately surrounding development includes:

- **North:** Immediately north of the site is South Street. On the opposite side of the street is Rydalmere Park which consists of cricket nets, bowling greens connected to a club, and a carpark.
- **East:** Park Road aligns with the eastern boundary of the site. On the opposite side of the road are smaller format warehouses and industry buildings.
- **South:** Immediately south of the site is Parramatta Valley Cycleway, which follows along the Parramatta River corridor located adjacent. Opposite the river, further south, are warehouse and distribution centres.
- **West:** The adjacent site to the west is made up of large format warehouse and industrial buildings similar to the site.

2.3. SITE DESCRIPTION

The Rydalmere industrial precinct is located 3km from the Parramatta CBD and is positioned in a central location within the LGA, with the University of Western Sydney Parramatta Campus and Parramatta CBD to its west, Sydney Olympic Park to its east, Parramatta River to the south and Victoria Road to the north. The Rydalmere industrial precinct is also located along the GPOP economic corridor.

Key details are provided in the table below with a site aerial photograph of the site is provided as **Figure 2**.

Table 1 Site Description

Feature	Description
Street Address	38-50 South Street, Rydalmere
Legal Description	Lot 10 Deposited Plan 774181
Site Area	Approximately 4.5 hectares
Local Government Area	City of Parramatta Council
Street frontages	Primary street frontage of 291 to South Street and 124m to Park Road.



Figure 2 Site in regional context

Source: Urbis

2.4. EXISTING DEVELOPMENT

The site currently accommodates a mixed-use complex known as Metro Centre Rydalmere. It is comprised of modern, high-quality office and industrial warehouses for a range of businesses. There are numerous contemporary tenancies available which make up Metro Centre, accompanied by an internal carpark and landscaping. The Metro Centre offers choice and flexibility for tenants who value the potential for growth and expansion.

The site also comprises a mid-19th century dwelling known as Truganini House which is currently used as a child-care centre and is located in the southeast portion of the Metro Centre.



Figure 3 Truganini House



Figure 4 Industrial lots

2.5. TRUGANINI HOUSE

Truganini House is located at 38-50 South Street, Rydalmere on the northern side of the Parramatta River. The subject site comprises of Lot 10 of Deposited Plan 774181. Truganini House is located within the Rydalmere Metro Centre, an industrial park with office/showroom and warehouse offerings. Truganini House is located within the south-east portion of the Metro Centre and is surrounded by buildings of the industrial park.

Truganini House was constructed in various stages from the mid to late nineteenth century. The northern portion of the house features a single storey building constructed of sandstone, with hipped and valley roof with a bellcast verandah extending across the northern façade. The southern portion of the house features a single storey brick and stucco Victorian residence with a hipped roof and a verandah around three sides. This portion of the house faces toward the Parramatta River, however, due to the development of the industrial estate, only limited views to and from the Parramatta River to this portion of the house exist. Truganini House is currently occupied as a childcare centre.

Truganini House is clearly defined from the rest of the industrial park through the use of kerbs, planter bed and hedging that surrounds the building at the south, west and north. Directly to the east of the house at the north is an open paved café seating area which is utilised by the 1990s double storey pitched roof, brick rendered café building, while at the south is a fenced grassed area used as part of the existing childcare centre. Outside of these immediate surrounds, the house sits within the industrial park and is surrounded by concrete driveways which provide access to the surrounding buildings of the industrial park and car parking.

A site survey was undertaken on 6th October 2020 to determine if any landscape elements remain that date to the nineteenth or early twenty-first century when Truganini House was still in use as a private residence. It had been recorded on an interpretative plaque at Truganini House that there was a stone arch at the eastern boundary of the site which originally had mounted statues of phoenixes. This arch provided entrance to the south side of the house via a circular drive with a fountain at the centre. None of these elements remain at the site today and there is no evidence of early fencing. A small dock/ bathing area on the Parramatta River at the south east corner of the site has also been recorded on historical mapping. The remnants of a dock do remain in this location; however, these remains lie outside of the subject site's existing curtilage and lot boundaries.



Figure 5 South and eastern side of Truganini House, with contemporary hedges and fencing



Figure 6 The northern and eastern facades of Truganini House



Figure 7 Eastern side of Truganini House adjacent to open café seating area



Figure 8 View of the western wing of the house, referred to as the barracks and the stables



Figure 9 Western side of Truganini House defined by kerbs and hedging. There is a landscaped yard to the southwest of the house, which is used by the childcare centre



Figure 10 The western boundary of Truganini house as defined by kerbs and hedging. Shown in the context of the industrial park development



Figure 11 Landscaped area at the west of Truganini House, bordered by planter beds



Figure 12 Interpretative plaque at the northern portion of Truganini House



Figure 13 Potential remains of dock/ bathing area at the Parramatta River at the southeast corner of the site

3. HISTORICAL OVERVIEW

The following historical overview focuses upon the historic curtilage of Truganini House. A detailed history of Truganini House was undertaken by Lucas Stapleton Johnson & Partners Pty Ltd in their report *Truganini, 38-50 South Street, Rydalmere: History and Condition Report* (13 June 2017). The below historical overview has adapted the history contained in that report, with a focus on the historic curtilage of the site.

3.1. MACARTHUR'S THE VINEYARD

Situated on the northern bank of Parramatta River, the site of Truganini House was part of the grounds of Hannibal Hawkins Macarthur's The Vineyard. Macarthur (1788-1861), nephew of John Macarthur of Elizabeth Farm, developed this estate from the early 1810s. Its genesis was a grant of 140 acres, flanked by Vineyard and Subiaco creeks, made to Philip Schaeffer in 1791, a former military man of German birth that had served with British forces in North America. Schaeffer named the grant The Vineyard.

In 1797 the grant was sold to Henry Waterhouse of the Royal Navy, who ran merino sheep there. HH Macarthur purchased the grant in 1813, and enlarged his land holding to the east towards present day Rydalmere by a grant of 160 acres made to Macarthur in 1822, and purchase of 80 acres originally granted to James Manning in 1792, and other early grants made to John Carver and John Seymour. In 1833 HH Macarthur engaged architect John Verge (1782-1861) to design a new villa (later known as Subiaco and demolished in 1961) for his estate, which was completed in 1837.¹



Figure 14 Field of Mars, 1820-1834. The approximate location of the subject site is circled in red.

Source: SLNSW, *The Field of Mars*, M Maps/0033

¹ J. McClymont, James Houison, *Parramatta's Forgotten Architect*, Parramatta and District Historical Society (2010)

3.2. THE VINEYARD BECOMES SUBIACO

HH Macarthur was closely involved with the management of the Bank of Australia, which collapsed in the financial crisis of the early 1840s. When the bank collapsed in 1843 Macarthur lost most of his personal estate and was forced into bankruptcy. Consequently, in 1848 Macarthur vacated The Vineyard prior to it being put up for sale. It was purchased in 1848 by Archbishop Polding on behalf of the Roman Catholic Church.

John Bede Polding (1794-1877) was of the Benedictine Order and had arrived in Sydney in 1835 to take charge of the newly formed Catholic diocese. Shortly after the purchase of The Vineyard, in 1849, the former residence was converted to a convent for Benedictine Sisters and school for girls, and the property was renamed Subiaco.²

In 1877 Roger William Bede Vaughan succeeded Polding as archbishop of Sydney. Vaughan (1834- 1883) had arrived in Sydney in 1873 and served as Polding's coadjutor. In 1878 Vaughan put up for sale the bulk of the grounds of Subiaco (east of Subiaco Creek) in a subdivision named Vineyard Estate.

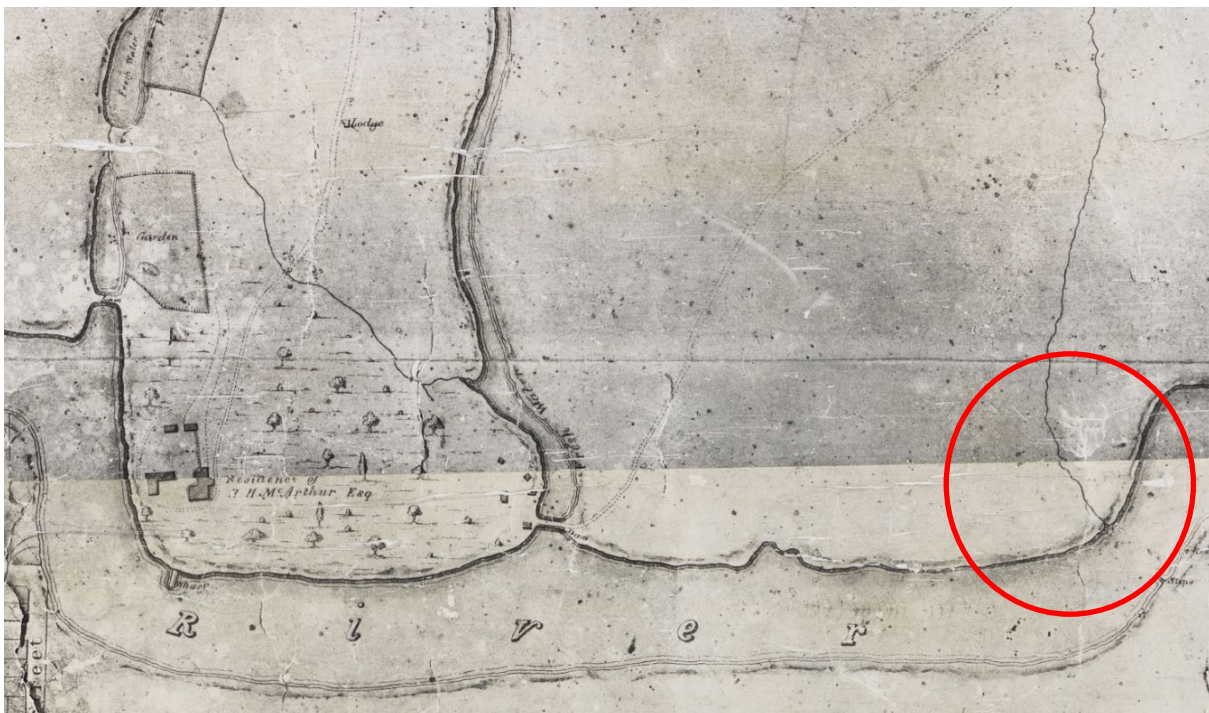


Figure 15 Detail from W. Meadows Brownrigg's 'Plan of the Town of Parramatta and the adjacent properties', dated 1844. The approximate location of the subject site is circled in red and shows no development.

Source: SLNSW, M M4 811.1301/1844/1, FL3690460

² Ibid.

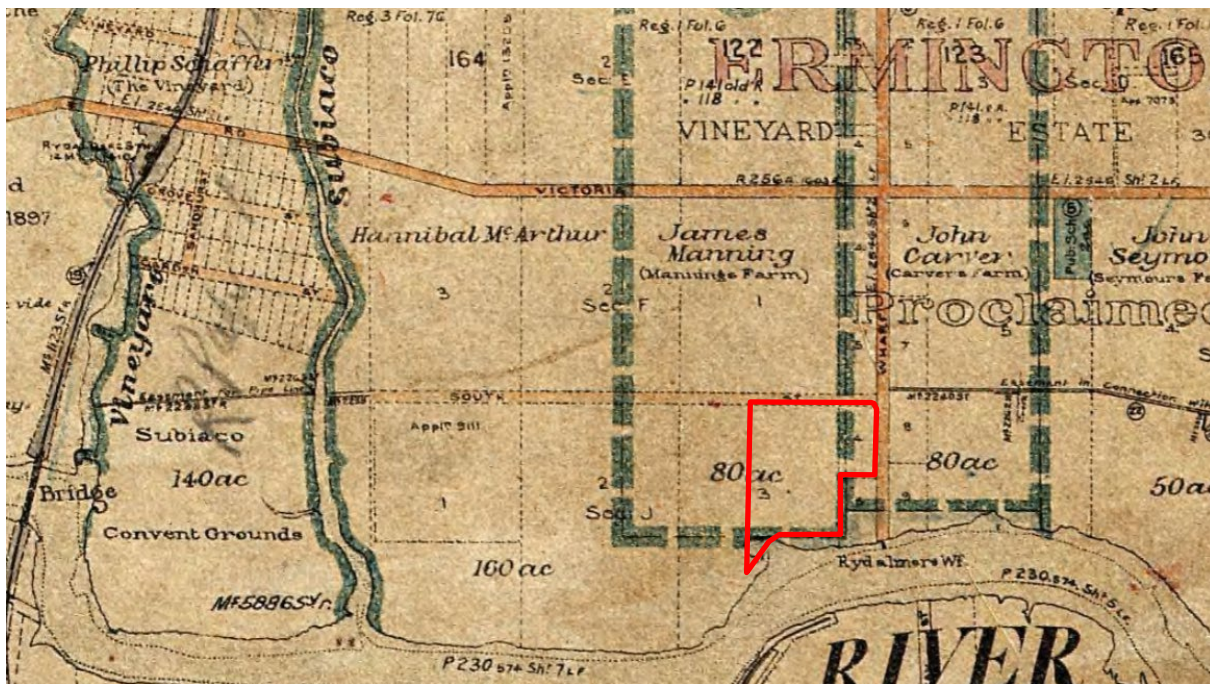


Figure 16 Detail from the 1890 edition of the map of the Parish of Field of Mars showing the numerous grants that made up Macarthur's The Vineyard Estate. The approximate boundaries of the subject site are outlined in red.

Source: NSWLRS, Historical Land Records Viewer, Cumberland, Field of Mars, 1890, Ed No. 4, Sheet 2

3.3. VINEYARD ESTATE SALE, 1878

The Vineyard Estate subdivision comprised a total of 38 lots, many of which were greater than 20 acres in area and intended for starting up orchards and small farms. The subdivision established three new public road reserves inclusive of South Street. The sale was held in November 1878.



Figure 17 Subdivision plan of the Vineyard estate undertaken in 1878 by the Catholic Church. The approximate existing heritage curtilage is outlined in red, and the historic subdivision is outlined in blue.

Source: SLNSW, Parramatta Subdivision Plans, Z/SP/P6/167

3.4. TRUGANINI HOUSE

The property is located within part of Lot 3 in Section J of this Vineyard Estate subdivision, which comprised an area of 20 acres 2 roods (19 acres 3 rood 22 perches on the sale plan). Lot 3 was purchased in July 1879 by local doctor Isaac Phipps Waugh for 246 pounds.³ Waugh (1841-1912) was an Irish born and educated surgeon. He moved to Parramatta in 1873.⁴

It has been stated Truganini was built by the time Waugh purchased Lot 3 in 1879, however, the subdivision plan of the Vineyard Estate does not identify any building being constructed across the Vineyard Estate, even though a brick cottage was standing in Lot 3.⁵ No council rate valuations are available for this part of western Sydney for the nineteenth century, and newspaper indexing and Sands' Directory provide no evidence for occupation for the early and mid-1880s. From 1881 Waugh resided at Tara (now demolished) in George Street, Parramatta, and in May 1882 Waugh sold Lot 3 to Augustus Robinson Winckler (??-1933) for 800 pounds.⁶ No money was exchanged at the time, and the matter was resolved in 1883 by a re-conveyance to Andrew Hardie McCulloch and payment of the money owing to Waugh.⁷ McCulloch (1820-1905) was a solicitor and land speculator with questionable business practices; he was also Waugh's brother-in-law (married Elizabeth Rose Holden McCulloch (1842-1926) in 1869).⁸

Subsequently, in January 1886 McCulloch sold the eastern half of Lot 3 (with an area of 9 acres 3 roods 31 perches) to Thomas Michael Williamson for 550 pounds.⁹ These subdivisions compared with the existing boundaries of the subject site are outlined in the figures below. Figure 19 indicates the location of an 'old jetty', remains of which still exist along the Parramatta River today.

³ Old System Conveyance Book 192 No. 853

⁴ McClymont 2010, p. 65.

⁵ Advertisement, Sydney Morning Herald, 23/11/1878, p.13.

⁶ Old System Conveyance 244 No. 205

⁷ Old System Conveyance 277 No. 615

⁸ McClymont, p. 66.

⁹ Old System Conveyance 332 No. 786

room, drawing room, library, six bedrooms, storeroom and dairy, kitchen, coach house and stables, and summer house. The contents were of such magnitude the auctioneers felt obliged to state the sale was the largest ever held in the district.¹⁴

The motivation for this move was undoubtedly Williamson having been caught withholding monies rightfully owing to his clients (that is mixing his client's money with his own personal account).¹⁵ Williamson, with no cash at hand to reimburse, was subsequently struck off the rolls of the Supreme Court in 1894.¹⁶ Williamson journeyed to Perth, Western Australia, about 1896. He remained there, practising as a commission agent, until his death, by suicide, in 1921.¹⁷

3.6. TENANTS (1894-1909)

In July 1888 Williamson mortgaged Truganini and his property in Redfern to The City Bank.¹⁸ These mortgages were not repaid and the bank in effect was the owner of the Truganini until 1906 when sold to Mrs Harriet Eastcott Cloudy.¹⁹ Cloudy soon after conveyed the property to Denis Manion in 1907.²⁰ A series of tenants occupied the house from 1893 and through the early 1900s. Some of the tenants were associated with the large meat freezing and canning works located on the south bank of the Parramatta River.

3.7. ARTHUR STERLING BARTON (1901-1914)

Between 1909 and 1914 Truganini was owned and occupied by Arthur Sterling Barton. Barton (1856- 1916) was a grazier with interests in the Wellington district, held pastoral stations around Walgett, and was a director of the pastoral firm Winchombe, Carson Ltd.²¹ It seems Barton bought Truganini as a place to retire and provide for the education of his children.²²

3.8. MEAT WORKS MANAGER'S RESIDENCE (1914-1923)

In July 1914 Barton sold Truganini to John Cooke & Co Pty Ltd for 2,100 pounds.²³ The principals of this company were John Cooke (1852-1917) and James Alexander Mackenzie Elder (1869-1946). Cooke was a meat exporter and a pioneer in the development of the frozen meat export trade.

In 1899 Cooke had promoted a company, Austral Meat Company, to build Sydney's largest meat freezing works²⁴, which was located at Sandown across Parramatta River and opposite Truganini. Cooke invested heavily in the Sandown works, and its operations commenced in late 1900.²⁵ The meat freezing works were destroyed by fire in 1923,40 and the site was redeveloped eventually for the Shell Oil Company refinery. In 1916 John Cooke & Co probably undertook alterations to Truganini, of which the installation of a septic tank required statutory approval.²⁶ John Cooke & Co owned Truganini until 1924, and in this period it seems probable the house served as the residence of the manager of the meat freezing works.

¹⁴ Advertisement, *Cumberland Argus*, 30/9/1893, p.5

¹⁵ 'Case of TM Williamson', *Sydney Morning Herald*, 10/3/1894, p.3

¹⁶ 'Thomas Michael Williamson. Struck off the Roll', *Evening News*, 13/3/1894, p.4

¹⁷ 'Death of Thomas Williamson', *West Australian*, 14/1/1922, p.7

¹⁸ Old Conveyance Book 522 No. 627

¹⁹ Old Conveyance Book 818 No. 555

²⁰ Old Conveyance Book 823 No. 496

²¹ Obituary, *Wellington Times*, 20/7/1916, p.5; 'Death of Mr AS Barton', *Sydney Morning Herald*, 20/7/1916, p.8

²² *Cumberland Argus*, 26/6/1909, p.4

²³ Old Conveyance Book 1035 No. 160

²⁴ Beever, EA, 'Cooke, John (1852–1917)', *Australian Dictionary of Biography*, Volume 8, Melbourne University Press, 1981

²⁵ 'Sandown Meat Works', *Cumberland Argus*, 4/8/1900, p.12

²⁶ 'Ermington and Rydalmere', *Cumberland Argus*, 16/6/1916



Figure 20 Oblique aerial photograph dated 1928 looking east along the Parramatta River. Truganini House is circled in red and the industry on the south bank can be seen on the right.

Source: SLNSW, GPO 1-24975 reproduced in *Parramatta: a past revealed* (1996)

3.9. RESIDENCE AGAIN (1924-1946)

With the removal of the meat works, from 1924 Truganini reverted to a family residence owned and occupied by Dr William John Stewart McKay²⁷ from 1924 to 1927, and then engineer James Stormonth until 1930.²⁸ McKay (1868-1948) was a medical graduate of Sydney University (1891), and held the position of senior surgeon at Lewisham Hospital from 1896 to 1933. He was acknowledged for his knowledge of animal breeding and blood stock.²⁹ In 1930 Truganini was conveyed to Dr Arthur Robert Marks.³⁰ Marks (1872-1946) was a dentist and he and his family resided at Truganini.

3.10. INTERNATIONAL COMBUSTION (AUSTRALIA) PTY LTD (ICAL) (1946-2000S)

Shortly before his death, in 1946 Dr Marks conveyed Truganini to International Combustion (Australia) Pty Ltd.³¹ The conveyance comprised the same land holding that TM Williamson had purchased in 1886. International Combustion (Australia) Pty Ltd was established in 1929 and their line of business was manufacturing boilers and ancillary equipment for steam plants and powerhouses.

The coming of International Combustion to South Street was entirely consistent with the planning controls of the County Cumberland Scheme that zoned the area industrial. While industrial use of land south of the river had commenced by 1900, industry in South Street began in 1938 with the opening of Hume Pipes.³² An unfortunate post war outcome of this industrial rezoning was the demolition of Verge's Subiaco in 1961.

On acquiring the site in South Street, International Combustion in 1949 raised 1,000,000 pounds in capital and constructed new factory premises on the site. In respect of Truganini, the company retained the house and its name, and converted the residence into the main office inclusive of board room and managerial

²⁷ Torrens Title Dealing B132137

²⁸ Torrens Title Dealing B589621

²⁹ 'Dr WJS McKay', *Tweed Daily*, 5/1/1948, p.2

³⁰ Torrens Title Dealing B973270

³¹ Torrens Title Dealing D481225

³² Kass, T, C Liston and J McClymont, *Parramatta: a past revealed*, Parramatta City Council, 1996, p.342 & p.370

offices. The attached wing was converted to the engineering office, and connected to that was a new accounts wing by 1954.

The historic subdivision from 1886 of Truganini House remained the same throughout the twentieth century until the 1980s when the lot was consolidated with the Lot 4 of the original Vineyard Estate located to the north-east of the at the intersection of South Street and Park Road. This lot had been separately developed over the late nineteenth and twentieth centuries. Truganini also underwent major renovation in 1986-1987 at the same time as the whole of the existing site was redeveloped as the existing industrial park. Truganini House was gazetted as a heritage item on 21 February 1997.

The below aerial images provide a visual overview of the changing setting of Truganini House from the 1940s to the 1990s. The aerial images demonstrate the substantial changes that have occurred to the setting of Truganini House and in turn its historic curtilage. By the 1990s, the open area between the Truganini House and the Parramatta River had been developed and the landscaped areas surrounding the house had been developed to its existing form.

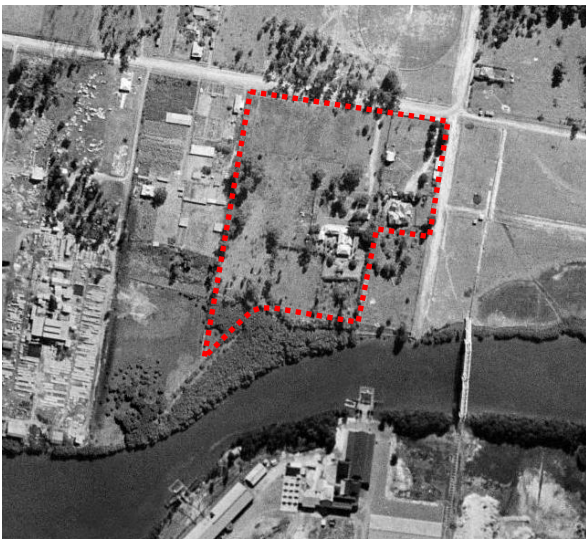


Figure 21 1943 aerial view with subject site outlined in red.

Source: SIX Maps, 2020



Figure 22 1950s aerial view with subject site outlined in red.

Source: Spatial Services, Historical Imagery, Search & Discovery



Figure 23 1960s aerial view with subject site outlined in red.

Source: Spatial Services, Historical Imagery, Search & Discovery

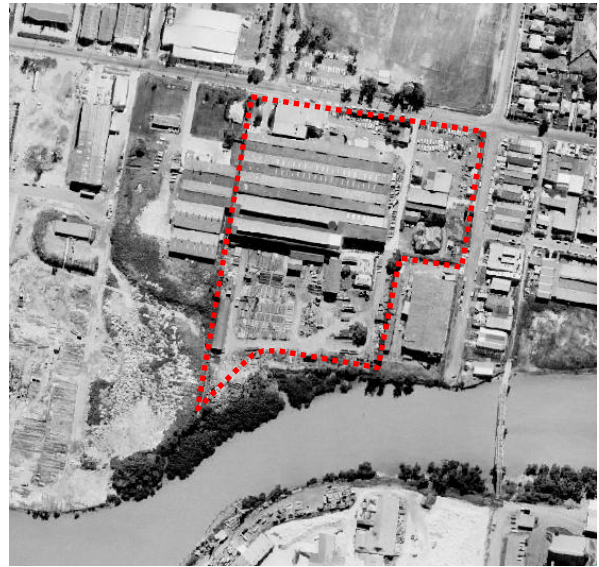


Figure 24 1970s aerial view with subject site outlined in red.

Source: Spatial Services, Historical Imagery, Search & Discovery



Figure 25 1980s aerial view with subject site outlined in red.

Source: Spatial Services, Historical Imagery, Search & Discovery



Figure 26 1990s aerial view with subject site outlined in red.

Source: Spatial Services, Historical Imagery, Search & Discovery

4. ESTABLISHED HERITAGE SIGNIFICANCE

4.1. WHAT IS HERITAGE SIGNIFICANCE?

Before undertaking change a listed heritage item, a property within a heritage conservation area, or a property located in proximity to a listed heritage item, it is important to understand the heritage values of the place and its broader heritage context. This understanding will underpin the approach to any proposed changes and identify what is important and why, and how these values can be protected. Statements of heritage significance summarise the heritage values of a listed heritage item – why it is important and why a statutory listing was made to protect these values.

4.2. HERITAGE LISTINGS

4.2.1. Subject Site Heritage Listings

The following heritage listings apply to the subject site.

Table 2 Statutory Heritage Listings

Heritage List	Item Name	Item Number
<i>Parramatta Local Environmental Plan 2023, Schedule 5, Part 1</i>	Truganini House and grounds, covering the whole of Lot 10, DP 774181	694
NSW State Heritage Register under the <i>Heritage Act 1977</i>	N/A	-
NSW State Agency Section 170 Heritage and Conservation Register under the <i>Heritage Act 1977</i>	N/A	-
Commonwealth Heritage List under the Cwlth <i>Environment Protection and Biodiversity Conservation Act 1999</i>	N/A	-
Australia's National Heritage List under the Cwlth <i>Environment Protection and Biodiversity Conservation Act 1999</i>	N/A	-
UNESCO World Heritage List (incl Buffer Zones)	N/A	-

As a result of previous lot consolidation dating to the 1980s, the whole of the site is subject to this heritage listing by being both mapped and described as a heritage item under Schedule 5 of the PLEP 2023. This is despite Truganini House and its immediate associated curtilage only occupying a small area within the broader property.

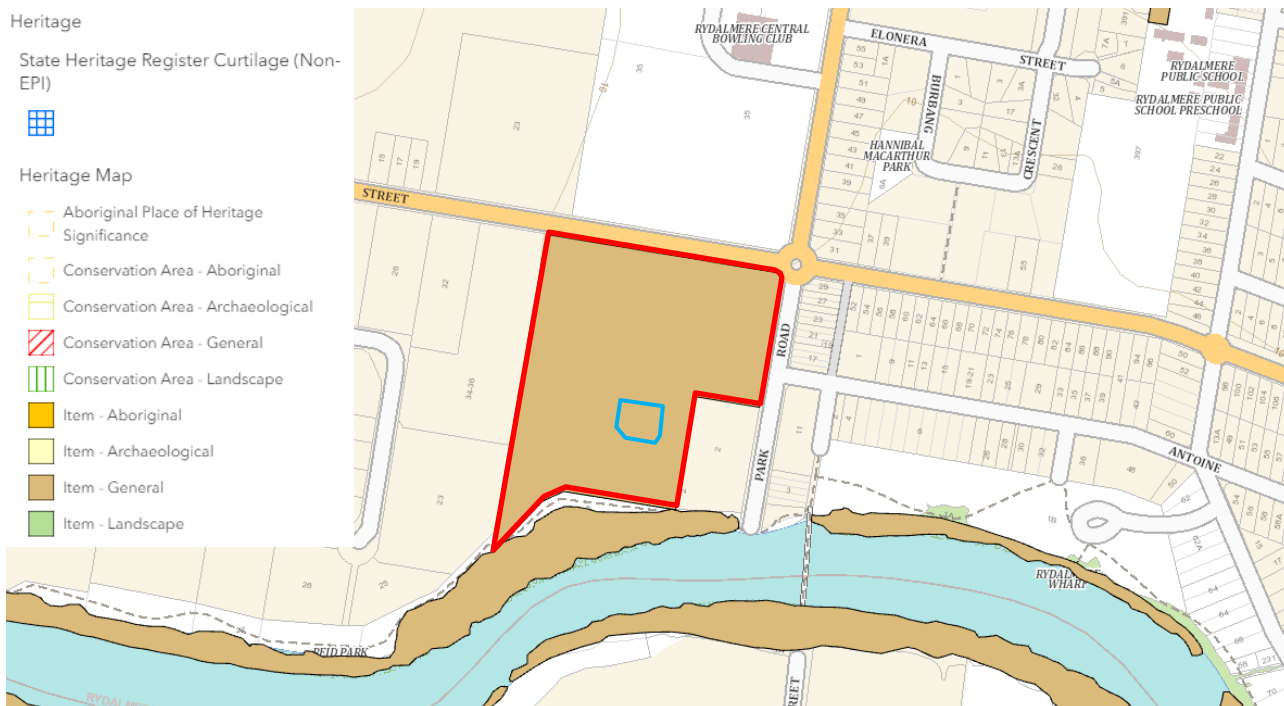


Figure 27 Heritage Map with subject site in red and location of Truganini House in blue

Source: NSW Planning Portal 2023

4.3. ESTABLISHED STATEMENT OF SIGNIFICANCE

The following Statement of Significance has been extracted from the State Heritage Inventory form for the subject site:³³

Truganini house, at 38 South Street is of significance for the local area for historical and aesthetic reasons, and as a representative example of quality houses of the Victorian period in the area. The house retains a great degree of integrity when viewed from the publicly accessible areas, and makes an important contribution to the area character.

Neither the statement of significance for Truganini House nor the physical description of Truganini House in the State Heritage Inventory form for the place include an assessment or description of the landscape that surrounds Truganini House. Instead, both the statement of significance and description refer only to Truganini House.

Noting the highly altered nature of the setting, with the house located within the industrial park, it is thus considered that the primary significance of Truganini House is limited to the house itself. The historic setting of the house has been irrevocably altered over the course of the twentieth century as demonstrated in the historical overview above. The existing landscaping that surrounds the house today has been installed since the 1980s redevelopment of the site. None of the buildings or landscaping outside of the immediate surrounds of the Truganini House contribute any significance to the place, instead, the surrounding industrial park including buildings and hard stand concrete driveways impede the historic understanding of the setting of Truganini House. Historic views are severely compromised or lost as a result of the existing development.

The Statement of Significance refers to the integrity of the dwelling and notes the contribution of the house to the character of the area as an important house of the Victorian period. It should be noted that this contribution is limited as the dwelling is not able to be viewed from the public domain outside of the existing industrial park.

³³ NSW Office of Environment and Heritage, State Heritage Inventory form for Truganni House, accessed via <https://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=2240522>

5. HISTORIC CURTLAGE DISCUSSION

As a result of previous lot consolidation dating to the 1980s, a majority of the site is both mapped and described as a heritage item in Schedule 5 of the *Parramatta Local Environmental Plan 2023* (PLEP 2023) and is identified as “Truganini House and grounds” (Item no. 694).

Based on historical research prepared by Urbis, the existing heritage curtilage does not reflect the original historical curtilage of Truganini House, nor is it considered to reflect the identified significance of the place appropriately.

It is considered that the historical curtilage which would have been of most relevance and significance is that which conformed with the original subdivision of the site from the Vineyard Estate subdivision of 1879 and the associated occupation by Issac Waugh (1879-1883), Andrew McCulloch (1883-1886) and Thomas Williamson (1886-1906). These curtilages are outlined in the map below.

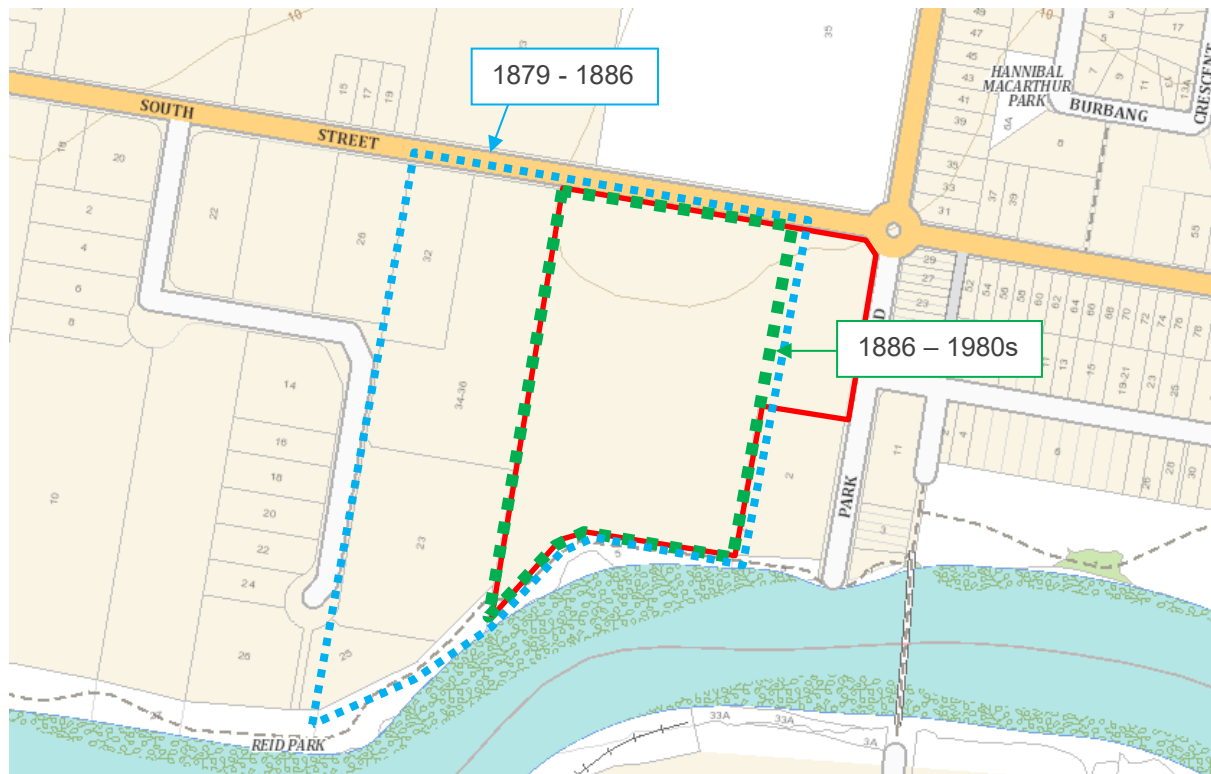


Figure 28 Approximate boundaries of historical subdivision patterns for Truganini House and the existing curtilage outlined in red.

Source: SIX Maps, 2020 with Urbis overlay

The exact date of construction of Truganini House is unknown. However, it is likely that Truganini House was constructed in two stages possibly during Isaac Waugh’s ownership from 1879 and during Thomas Williamson’s ownership from 1886. In either case, Truganini House had reached its present size by 1893. Either of the curtilage’s outlined in the map above would have reflected the significant subdivision patterns of the late nineteenth century when the north side of the Parramatta River was predominated by small farms and orchards. The two lots located directly to the east of these lots did not form part of the existing site until the 1980s when the these lots were consolidated to form the present day lot.

The original landscape and setting of Truganini House has been irrevocably altered since the rezoning of South Street to industrial use during the 1930s. Since this time, the site of Truganini House has been surrounded by industrial development, the latest iteration being constructed during the 1980s. No remains of the original late nineteenth century landscape are left at the site, nor are any other indications of either the 1879 or 1886 subdivision patterns, due to the site being subdivided and consolidated over the course of the twentieth century. It is thus considered that the existing heritage curtilage of Truganini House does not reflect either of the historical subdivision patterns of Truganini House and the retention of the existing heritage curtilage, as mapped in the *Parramatta LEP 2023* is unfounded and is merely based on the consolidated lots established in the 1980s.

6. RESPONSE TO PRE-LODGE MENT ADVICE

A pre-lodgement meeting with Council officers was held on 27 September 2023. Following the meeting, Council officers completed a review of the submitted information and provided detailed advice and recommendations for the lodgement.

Their advice agrees that *“in principle that there is strategic merit in reducing some of the extent of the existing heritage curtilage as some of the original heritage setting has been reduced over time and the site now contains various established industrial land uses.”*³⁴

In addition, the Council advised that the proposed curtilage should take consider *“heritage item’s relationship to the Parramatta River and original setting.”* Urbis contends that all evidence of the original setting of the heritage item has been eroded due to the existing industrial development located on all sides of Truganini House.

Council identify the visual relationship between Truganini House and the Parramatta River in particular as being of consideration. Urbis emphasises that this visual connection is all but lost given the current built development within the site, and any remaining views are incidental due to the configuration of surrounding industrial units, and are not representative of the original visual relationship of these elements.

We provide the following responses to Councils feedback.


Table 3 Responses to Council Feedback

Council Feedback/Advice	Urbis Response
<p>4. Council officers identify two key functions of the subject heritage curtilage as part of this site:</p> <p><i>* From a strategic planning perspective, the heritage curtilage plays an important role in protecting the heritage value of the heritage item, which comprises the building and some of its immediate surrounds. In addition, the heritage curtilage can help protect interpretation of the original setting of the heritage item. For example, retaining some of the land around the building to the north, east and west allows opportunities for future landscaping that will help to buffer the item from established industrial uses. Whist it is appreciated that some of this land currently comprises car parking and access, maintaining some of this curtilage beyond the immediate heritage item / building will help to safeguard these opportunities to potentially re-establish the setting into the future.</i></p>	<p>Urbis agree in principle and support the inclusion of the immediate landscaped setting around Truganini House within the revised heritage curtilage as this provides a setting for the house and opportunity for improved landscape outcomes. Urbis do not support the inclusion of ancillary car parking areas within the revised curtilage as these areas are wholly disconnected from the heritage item, and lie within the realm of the industrial park, and do not make a defining contribution to significance.</p> <p>Further the existing café building to the east should be excluded as this is a later 1990s addition of not contributing value to the heritage significance.</p>

³⁴ City of Parramatta, Pre-Lodgement Council Officer Advice Letter, dated 27 October 2023

Council Feedback/Advice	Urbis Response
<p><i>* In addition, retaining the curtilage (as it currently already exists) to the south will reinforce the heritage item's original connection to the river and original jetty location and will serve to help protect existing view lines and to safeguard opportunities to potentially reestablish past view lines.</i></p>	<p>Urbis disagree with the inclusion of land to the immediate south within the revised curtilage. This land is occupied by late twentieth century industrial development which does not make a defining contribution to the significance of Truganini House and in fact is an intrusive element.</p> <p>As discussed previously, the existing view lines between the river and the House are incidental due to the configuration of surrounding industrial units, and are not representative of the original visual relationship of these elements. It is unlikely that the industrial development will ever be removed to recapture an original visual setting for this item.</p> <p>Further, the proposed curtilage connection outlined by Council between the House and the River is not reflective of any of the historic curtilages assessed for the site or evident in historic subdivision plans. This is an incidental curtilage based on a visual connection that has been lost.</p> <p>The connection with the jetty is also questioned as this element was located on the southern alignment of the River and not located within our site. Despite historical associations with this jetty, it is noted that the jetty no longer exists and the connection is tenuous as it is located outside of the property. It is also noted that the current property boundary does not extend fully to the waterfront and therefore has no physical connection with the River.</p>
<p><i>* DAs are required for any development on land to which the heritage curtilage currently applies. The heritage provisions in the LEP and controls in the DCP therefore need to be considered for development that is subject to the heritage curtilage. This provides an additional level of merit-based assessment that helps to protect the integrity of the heritage item (e.g., materiality interface, building design, articulation, and landscaping).</i></p>	<p>Noted.</p>
<p><i>8. It is agreed that the heritage listing of the PLEP 2023 I591 (Truganini House and grounds) should be revisited and updated to reflect the current statement of significance and extent of the heritage curtilage given that since the post-war period, the industrial area redevelopment has compromised some of the historical setting. Historically, the farmhouse had important physical and visual</i></p>	<p>As discussed previously, the existing view lines between the river and the House are incidental due to the configuration of surrounding industrial units, and are not representative of the original visual relationship of these elements. It is unlikely that the industrial development will ever be removed to recapture an original visual setting for this item.</p>

Council Feedback/Advice	Urbis Response
<p><i>connections with the Parramatta River. Industrial development surrounding Truganini House has reduced some of these important connections. Notwithstanding, it is important to protect this local listing whilst safeguarding the potential to re-establish its river connection into the future.</i></p>	<p>Further we note that the heritage item is now identified as Item 694 under Schedule 5 of the <i>Parramatta LEP 2023</i>, not as Item 591 which was its previous item number under the <i>Parramatta LEP 2011</i>.</p>
<p><i>9. A degree of risk is associated with the proposed reduction of the heritage curtilage as it could further isolate the house and decontextualise the historical use of the surrounding grounds, which were once dedicated to rural uses, such as farming activities. This connection between the building and its setting has been reduced due to the surrounding industrial development.</i></p>	<p>We do not agree that there are risks associated with further isolating the heritage item. This planning proposal seeks to revise the existing heritage listing extent to appropriately reflect and capture the elements of heritage value on the site. The inclusion of later industrial development within this curtilage is not appropriate or necessary. We have proposed a curtilage based on the broadest extent of the remaining setting, visual and landscaped, to ensure the heritage item is appropriately protected. Further it is noted that any major development within the vicinity of the revised heritage item curtilage will still require Council approval and heritage assessment to mitigate impacts.</p>
<p><i>11. Council officers do not support the proposed reduced heritage curtilage to the extent illustrated in the documents prepared by Urbis as it appears insufficient to offer protection to Truganini House and interpretation of its setting. Moreover, the small curtilage proposed will isolate the heritage item and does not adequately reflect the relationship of Truganini House to the Parramatta River.</i></p> <p><i>The curtilage of local heritage items should be largely retained and conserved wherever possible. The amendment of the curtilage for Truganini House should include the area of grounds that previously extended to the river. Most of the subtracted current curtilage would facilitate and allow the use of Exempt and Complying Development in the wider industrial area (subject to compliance with the Codes SEPP) without compromising future opportunities for better management of the item and its settings.</i></p>	<p>Urbis disagree with the Council's assessment that the proposed curtilage is insufficient. In our view it encompasses all of the remnant elements of heritage value on the site which make a defining contribution to significance along with the broadest logical setting surrounding the house having regard to the existing built context of the place.</p> <p>Urbis disagrees that the curtilage should extend to the southern boundary in an effort to recognise the lost relationship between the house and the river. Extending the curtilage south towards the river will not actually include any riverfront land, as this lies within a separate lot outside of the subject property. It also will not capture any historically significant view corridors, and will be limited to capturing existing arbitrary view corridors between industrial units.</p>

Council Feedback/Advice	Urbis Response
<p>12. Acknowledging the highly modified context and the current extent and dedication of the general industrial zone, Council's Senior Heritage Specialist recommends the following indicative heritage curtilage that includes a buffer zone to mitigate possible impact to the heritage item and, additionally, would not preclude the re-establishment of physical and visual connections between Truganini House and the Parramatta River. The heritage curtilage outlined below is indicative and subject to further detailed analysis at the Planning Proposal assessment stage.</p>  <p>Figure 2: Council's indicative curtilage</p>	<p>Urbis disagrees with Council's proposed amended curtilage, as this is not based on an assessment of the remaining elements of heritage value extant today and incorporates elements of no heritage value within the industrial development.</p> <p>The extension of the curtilage south towards the river does not achieve a physical connection with the riverfront as this land is within a separate holding. It also does not capture any significant visual connection with the riverfront, as existing view corridors between the House and the River are arbitrary views created by gaps in the surrounding industrial units.</p> <p>Further, the proposed curtilage is not based on any of the assessed historic boundaries for the property outlined in this report. It appears to be based on an arbitrary curtilage extending towards the River and there is no basis for why this area of the property adjacent to the River is more significant than other areas adjacent to the River. In our view, the curtilage should be applied reflecting an evidence based assessment of heritage values and elements.</p>
<p>13. The State Heritage Inventory sheet identifies that "Truganini House is a single storey brick and stucco Victorian residence with a hipped roof and a verandah on three sides, sited to face Parramatta River" and that "the building is of interest as little physical evidence remains from this period of rural settlement along the Parramatta River". The site in its original context possesses potential to contribute to an understanding of early nineteenth century rural settlement and the new listing name should recognise this important connection with the context and setting.</p>	<p>We agree with the existing State Heritage Inventory record's assessment of the place and that 'little physical evidence remains' of this period and development. This has informed our assessment of an appropriate curtilage responding directly to the remaining physical evidence of this period.</p>

Council Feedback/Advice	Urbis Response
<p><i>14. Accordingly, it is recommended that the heritage item description be amended to 'Truganini House and river front setting', which retains clues of a larger curtilage while simultaneously identifying the location of the heritage item and its connection to the river. See Section 1.1 for reference images.</i></p>	<p>We disagree with this recommended heritage item name, as it does not reflect the heritage context of the place. The heritage item does not retain any semblance of a riverfront setting as a result of previously approved development which now surrounds the House. The property is also legally severed from the River, with the riverfront land lying within a distinctly separate landholding. Any visual connections to the River are arbitrary and based on incidental views between industrial units. There is no physical connection to the River available.</p>
<p><i>15. The revised statement of significance and description of Truganini House should also include the description of the jetty remains, which was an important asset in accessing the river. This access is dated to the late nineteenth century and was important for the north side of the Parramatta River, which was predominantly populated by small farms and orchards.</i></p>	<p>We are not proposing a revised Statement of Significance or Description of Truganini House compared to what is currently outlined on the NSW State Heritage Inventory record for the item. In our view the existing Statement of Significance and Description appropriately reflect the values of the heritage item.</p> <p>This planning proposal is limited to a revision of the Heritage Item Name, Property Description and mapping under Schedule 5 of the LEP.</p>

7. PROPOSED HERITAGE LISTING AMENDMENTS

7.1. PREVIOUSLY PROPOSED AMENDED HERITAGE LISTING

Having regard to the historical summary outlined herein, and the curtilage assessment undertaken with regards to the remaining elements of heritage value on the site, Urbis originally proposed the following revised curtilage in our scoping report for this application:

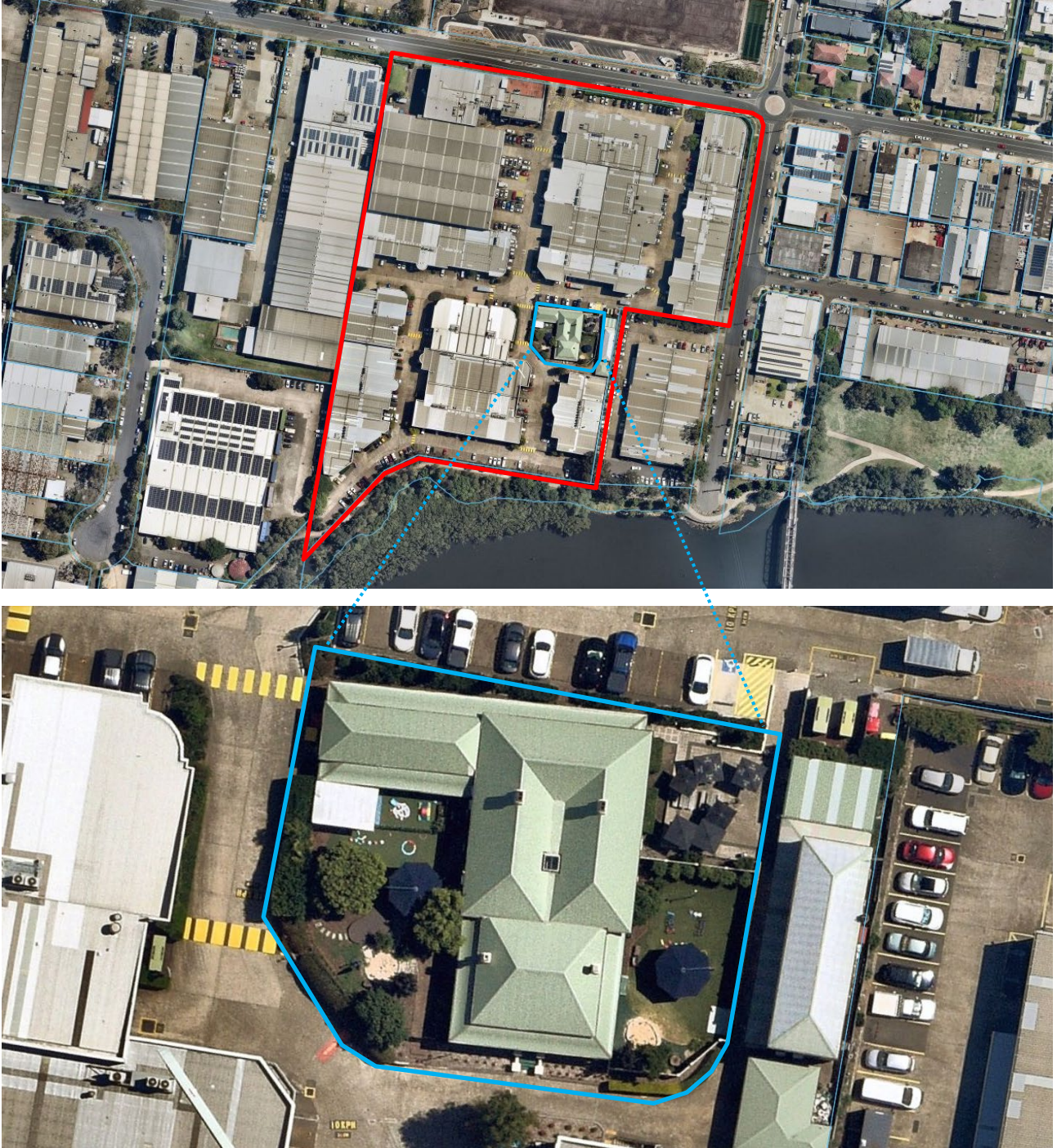


Figure 29 Previous proposed heritage curtilage for the amended heritage listing in blue and broader lot in red.

Source: Nearmap 2023 with Urbis overlay

The proposed amended heritage listing outlined above is based on the following considerations:

- Inclusion of those elements on the site which are considered to have heritage value and reflect the identified significance of the heritage item.
- A visual inspection of the development in the immediate vicinity.
- The logical axis' created by the configuration of the surrounding roads which already serve as a buffer around the dwelling.
- Retention of the associated garden areas to the immediate east and south west of the house which provide a setting for the building.
- Potential future requirements to undertake works to the roads around the house.
- Consideration of a visual setting and curtilage for the house.

This area encompasses the fabric of heritage significance on the site, and the immediate landscaped gardens which are associated with the House. We proposed this amended curtilage be adopted on the Heritage Map

The following amendments to Schedule 5, Part 1 of the *Parramatta LEP 2023* were proposed in our scoping report.

Item No. 694	Item Name	Property Description
Current	Truganini House and grounds	Lot 10, DP 774181
Previously Proposed by Urbis	Truganini House and immediate garden setting	Part Lot 10, DP 774181

7.2. COUNCIL PROPOSED AMENDED HERITAGE LISTING

A pre-lodgement meeting with Council officers was held on 27 September 2023. Following the meeting, Council officers completed a review of the submitted information and provided detailed advice and recommendations for the lodgement. This included their recommended amended curtilage and listing amendments as follows:



Figure 30 Council's proposed amended curtilage

Source: *Parramatta Council Formal Pre-Lodgement Feedback Letter*

Council recommended the following amendments to Schedule 5, Part 1 of the *Parramatta LEP 2023*, siting that it “*retains clues of a larger curtilage while simultaneously identifying the location of the heritage item and its connection to the river.*”³⁵

Item No. 694	Item Name	Property Description
Current	Truganini House and grounds	Lot 10, DP 774181
Proposed by Council	Truganini House and riverfront setting	?

We dispute the above Council recommended heritage curtilage and listing amendments on the following heritage grounds:

- The Council proposed curtilage outline is arbitrary and not based on any historical subdivision boundary applicable to the heritage item, nor is it based on an assessment of the remaining elements of heritage value extant on the site.
- The Council proposed curtilage includes elements of no heritage value and which do not make a defining contribution to the significance of the place, including car parking areas for the industrial development, the 1990s café building and industrial factory units.
- The proposed amended Item Name includes ‘and riverfront setting’ – we contend that the heritage item no longer has a riverfront setting. It is visually separated from the riverfront by contemporary development and any view corridors between the river and the House are incidental only and not historically significant. Further, the property has no physical connection to the riverfront land, which is held in separate ownership, and therefore the heritage item has no ‘riverfront’.

Following the lodgement of the Planning Proposal to Parramatta City Council, Council officer’s undertook a detailed assessment and advice was received from Council’s Senior Heritage Specialist and Heritage Advisory Committee. In an email to Dexus (the client) from William Jones (Team Leader – Major Projects and Precincts | City Planning, City of Parramatta) dated 16 August 2024, the following advice was received in relation to proposed further changes to the heritage curtilage to Truganini House:

... Council officers request that the café building adjacent to Truganini House be included in the amended heritage curtilage, which is also consistent with the advice provided as part of the formal pre-lodgement meeting.

I note that the Heritage Impact Statement prepared by Urbis states the café building was excluded from the reduced heritage curtilage as it was built in 1990 and is of no heritage value. Furthermore, it is argued that the café “[does] not contribute to the significance of the heritage item, nor contribute to Council’s intended riverfront connection”.

While Council officers acknowledge your justification, it is considered that the café building should remain part of the existing heritage curtilage for the following reasons:

- *It is immediately adjoining, and visually connected to, the heritage item.*
- *Retaining the café building as part of the existing curtilage will result in a continuous curtilage along the east, down to the river.*
- *The café (built in 1990) is the only building on the site that has been sensitively designed from a scale and aesthetic perspective to be compatible with the immediately adjoining heritage item. Council officers wish to retain their ability to properly assess any future changes to this building via future Development Applications given its proximity to the heritage item.*

³⁵ Parramatta Council Pre-Lodgement Feedback Letter

For the reasons given above, Council officers request that your Planning Proposal retains the café as part of the existing heritage curtilage. I note that once this matter is resolved we will then be able to progress this Planning Proposal to a Local Planning Panel meeting.

Urbis have reviewed Council's request to update the proposed heritage curtilage to Truganini House to include the 1990s café. We confirm that this report has updated the proposed heritage curtilage to include this additional area.

7.3. PROPOSED AMENDED HERITAGE LISTING FOR THIS PLANNING PROPOSAL

Having regard to the Council's pre and post-lodgement feedback received, and the analysis contained in this report, Urbis propose the following heritage listing amendments in this Planning Proposal:

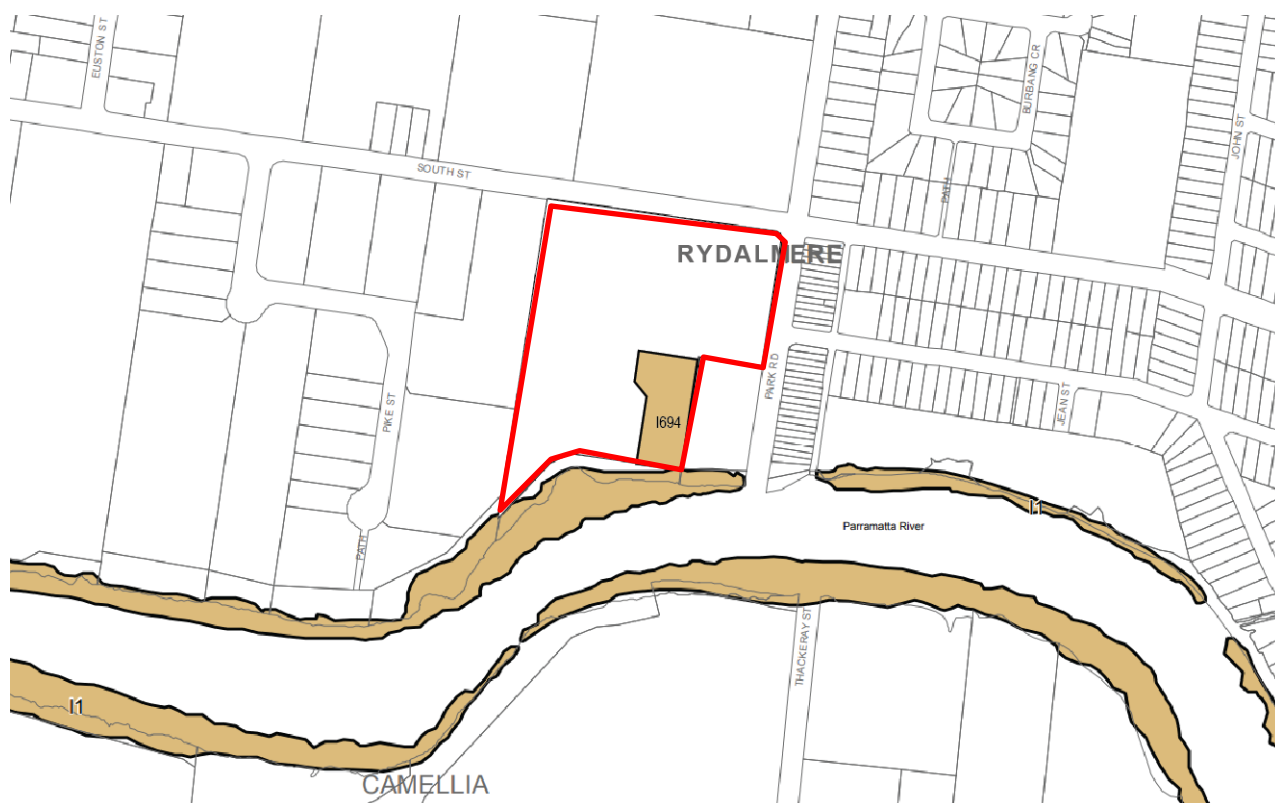


Figure 31 Proposed heritage curtilage to be adopted in the Heritage Map for *Parramatta LEP 2023*, subject site outlined in red.

Source: Urbis

We proposed the following amendments to Schedule 5, Part 1 of the *Parramatta LEP 2023*.

Item No. 694	Item Name	Property Description
Current	Truganini House and grounds	Lot 10, DP 774181
Proposed	Truganini House and riverfront setting	Part Lot 10, DP 774181

Whilst Urbis did disagree in principle with the inclusion of land to the south of the House within the amended curtilage during pre-lodgement feedback, we acknowledge Council's feedback and intent. Accordingly, we have amended the proposed curtilage to balance Council's feedback and the curtilage analysis contained within this report, considering the extent of change being sought to the existing curtilage.

We have excluded the adjacent car parking areas to the north. This areas do not contribute to the significance of the heritage item, nor contribute to Council's intended riverfront connection and inclusion of the cafe.

We understand from feedback received from Parramatta Council, that the amended curtilage will be shown on the Heritage Map for *Parramatta LEP 2023* as a reduced coloured area, and will not retain the whole lot shaded in as is standard practice.³⁶

For clarity, the proposed curtilage is shown overleaf overlaid on an aerial image.



Figure 32 Proposed heritage curtilage to be adopted in the Heritage Map for *Parramatta LEP 2023* in blue, subject site outlined in red.

Source: Urbis

³⁶ Email Correspondence, William Jones, Team Leader – Major Projects and Precincts | City Planning, City of Parramatta, 20 Nov 2023

8. IMPACT ASSESSMENT

The following impact assessment has assessed the proposed works against the relevant provisions and controls of the Council's statutory and non-statutory planning controls as well as the Heritage NSW 'Statement of Heritage Impact' assessment guideline questions.

8.1. PARRAMATTA LOCAL ENVIRONMENTAL PLAN 2023

The table below provides an impact assessment of the proposal against the relevant clause for heritage conservation in the *Parramatta LEP 2023*.

Table 4 Impact assessment against the relevant clauses of the Parramatta LEP 2023

Clause	Response
<p>(1) Objectives</p> <p><i>The objectives of this clause are as follows:</i></p> <p><i>(a) to conserve the environmental heritage of the City of Parramatta,</i></p> <p><i>(b) to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,</i></p> <p><i>(c) to conserve archaeological sites,</i></p> <p><i>(d) to conserve Aboriginal objects and Aboriginal places of heritage significance</i></p>	<p>The Planning Proposal meets the objectives of the <i>Parramatta LEP 2023</i> as it seeks to appropriately assess, acknowledge and legislate the significance of Truganini House and the property.</p>
<p>(2) Requirement for consent</p> <p><i>Development consent is required for any of the following:</i></p> <p><i>(a) demolishing or moving any of the following or altering the exterior of any of the following (including, in the case of a building, making changes to its detail, fabric, finish or appearance):</i></p> <p><i>(i) a heritage item,</i></p> <p><i>(ii) an Aboriginal object,</i></p> <p><i>(iii) a building, work, relic or tree within a heritage conservation area,</i></p> <p><i>(b) altering a heritage item that is a building by making structural changes to its interior or by making changes to anything inside the item that is specified in Schedule 5 in relation to the item,</i></p> <p><i>(c) disturbing or excavating an archaeological site while knowing, or having reasonable cause to suspect, that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed,</i></p>	<p>This Planning Proposal seeks consent for statutory changes to the heritage listing for Item No. 694 under Schedule 5 Part 1 of the <i>Parramatta LEP 2023</i>. It does not apply for any physical works to be undertaken, and it limited to an administrative application only.</p>

Clause	Response
<p>(d) <i>disturbing or excavating an Aboriginal place of heritage significance,</i></p> <p>(e) <i>erecting a building on land:</i></p> <p>(i) <i>on which a heritage item is located or that is within a heritage conservation area, or</i></p> <p>(ii) <i>on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance,</i></p> <p>(f) <i>subdividing land:</i></p> <p>(i) <i>on which a heritage item is located or that is within a heritage conservation area, or</i></p> <p>(ii) <i>on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance.</i></p>	
<p>(4) Effect of proposed development on heritage significance</p> <p><i>The consent authority must, before granting consent under this clause in respect of a heritage item or heritage conservation area, consider the effect of the proposed development on the heritage significance of the item or area concerned. This subclause applies regardless of whether a heritage management document is prepared under subclause (5) or a heritage conservation management plan is submitted under subclause (6).</i></p>	<p>A detailed curtilage analysis and heritage impact assessment has been undertaken. The proposed heritage listing amendments outlined herein are considered to be appropriate for the significance of the site.</p>
<p>(5) Heritage assessment</p> <p><i>The consent authority may, before granting consent to any development:</i></p> <p>(a) <i>on land on which a heritage item is located, or</i></p> <p>(b) <i>on land that is within a heritage conservation area, or</i></p> <p>(c) <i>on land that is within the vicinity of land referred to in paragraph (a) or (b),</i></p> <p><i>require a heritage management document to be prepared that assesses the extent to which the carrying out of the proposed development would affect the heritage significance of the heritage item or heritage conservation area concerned.</i></p>	<p>This heritage impact statement has been prepared to assist the consent authority in their determination and to assess the potential heritage impacts of the Planning Proposal. This heritage impact statement satisfies the requirement under this clause.</p>

Clause	Response
<p>(6) Heritage conservation management plans</p> <p><i>The consent authority may require, after considering the heritage significance of a heritage item and the extent of change proposed to it, the submission of a heritage conservation management plan before granting consent under this clause.</i></p>	<p>A conservation management plan is not considered necessary in this application. No physical works are proposed to any elements of heritage significance. A detailed analysis of the historic curtilage has been included in this report and informs the conclusions for listing amendment.</p>

8.2. PARRAMATTA DEVELOPMENT CONTROL PLAN 2023

The new Parramatta Development Control Plan (DCP) 2023 came into effect on 18 September 2023. The table below provides an impact assessment of the proposal against the relevant controls for heritage conservation in the Parramatta DCP.

Table 5 Impact assessment against the relevant controls of the Parramatta DCP

Control	Response
PART 7 HERITAGE AND ARCHAEOLOGY	
<p><u>Objectives</u></p> <p><i>O.01 Ensure the appropriate management of heritage in the City.</i></p> <p><i>O.02 Retention and reinforcement of the attributes that contribute to the heritage significance of items, areas and their settings.</i></p>	<p>The Planning Proposal meets the objectives of the Parramatta DCP 2023 as it seeks to appropriately assess, acknowledge and legislate the significance of Truganini House and the property.</p>
<p><u>Curtilage</u></p> <p><i>O.12 The majority of built heritage items in the City are listed with their curtilage contained within the lot boundary containing the item. In some cases, there is a reduced curtilage where the significance of the item and its interpretation is not dependant on having a large curtilage extending to the lot boundary.</i></p> <p><i>In such cases it is necessary to identify a curtilage that enables the heritage significance of the item to be retained. It is also possible that there will be an expanded curtilage for some items where the curtilage is greater than the property boundary.</i></p> <p><i>An expanded curtilage may be required to protect the landscape setting or visual catchment of an item. For example, the significance of some properties includes a visual link between the property itself and a river or topographical feature.</i></p>	<p>A detailed curtilage assessment is included in this report and informs the conclusions and recommendations of this Planning Proposal.</p>

8.3. HERITAGE NSW GUIDELINES

The table below provides an impact assessment of the proposal against the relevant questions posed in Heritage NSW's (former Heritage Office/Heritage Division) 'Statement of Heritage Impact' guidelines.

Table 6 Impact assessment against the relevant Heritage NSW Guideline Considerations

Provision	Response
<i>Will the proposed works be the best conservation solution for the heritage item?</i>	Yes, the Planning Proposal will be the best means of conserving the significance of the place, as it appropriately assesses, acknowledges and legislates the significance of Truganini House and the property.
<i>Will the works promote the ongoing use and upkeep of the item?</i>	Yes, the Planning Proposal will facilitate the appropriate heritage management of the place and respond to the identified significance of the item, thereby promoting its ongoing use and upkeep.
<i>Do the proposed works affect the setting of the heritage item, including views and vistas to and from the heritage item and/or a cultural landscape in which it is sited? Can the impacts be avoided and/or mitigated?</i>	No, no physical works are proposed that will alter the existing setting of the item.
<i>Are the proposed works part of a broader scope of works?</i>	No, this Planning Proposal seeks consent for statutory changes to the heritage listing for Item No. 694 under Schedule 5 Part 1 of the <i>Parramatta LEP 2023</i> . It does not apply for any physical works to be undertaken, and it limited to an administrative application only.
<i>Does this proposal relate to any previous or future works? If so, what cumulative impact (positive and/or adverse) will these works have on the heritage significance of the item?</i>	No, this is a stand alone Planning Proposal.
<i>Are the proposed works to a heritage item that is also significant for its Aboriginal cultural heritage values? If so, have experts in Aboriginal cultural heritage been consulted?</i>	It is beyond the scope of this report to consider Aboriginal cultural heritage and archaeology.
<i>If the proposed works are to a local heritage item, are the requirements of the development control plans or any local design guidelines that may apply to the site considered?</i>	Yes, refer to the impact assessment included at Section 8.2 of this report.
<i>Will the proposed works result in adverse heritage impact? If so, how will this be avoided, minimised or mitigated?</i>	No.

9. CONCLUSION AND RECOMMENDATIONS

This Planning Proposal seeks consent for statutory changes to the heritage listing for Item No. 694 under Schedule 5 Part 1 of the Parramatta LEP 2023. It does not apply for any physical works to be undertaken, and it limited to an administrative application only.

Having regard to the Council's pre-lodgement feedback received, and the analysis contain in this report, Urbis propose the following heritage listing amendments in this Planning Proposal:



Figure 33 Proposed heritage curtilage to be adopted in the Heritage Map for *Parramatta LEP 2023*, subject site outlined in red.

Source: Urbis

We proposed the following amendments to Schedule 5, Part 1 of the *Parramatta LEP 2023*.

Item No. 694	Item Name	Property Description
Current	Truganini House and grounds	Lot 10, DP 774181
Proposed	Truganini House and riverfront setting	Part Lot 10, DP 774181

Whilst Urbis did disagree in principle with the inclusion of land to the south of the House within the amended curtilage during pre-lodgement feedback, we acknowledge Council's feedback and intent. Accordingly, we have amended the proposed curtilage to balance Council's feedback and the curtilage analysis contained within this report, considering the extent of change being sought to the existing curtilage.

We have excluded the adjacent car parking areas to the north. This areas do not contribute to the significance of the heritage item, nor contribute to Council's intended riverfront connection and inclusion of the cafe.

A detailed curtilage assessment and heritage impact assessment of the proposed works has been undertaken in this report. This Planning Proposal is considered to be the best means of conserving the significance of the place, as it appropriately assesses, acknowledges and legislates the significance of Truganini House.

The Planning Proposal is recommended for approval from a heritage perspective.

10. BIBLIOGRAPHY & REFERENCES

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[Note: Some government departments have changed their names over time and the above publications state the name at the time of publication.]

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