

27th November 2020

Helena Miller,
MG Planning,
PO Box 197, Drummoyne NSW 1470
by email: helena.miller@mgplanning.com.au

Dear Helena,

**Re Final Heritage Review and DA conditions for DA/277/2020 - Aquatic Leisure Centre
Parramatta**

Please find my heritage review of the drawings and accompanying documents for the DA/277/2020. The report has the following table of contents and concludes with DA conditions that are provided to ensure that heritage considerations are at the forefront of the progression of this development.

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BACKGROUND

Julie Marler, Landscape Architect and Heritage Specialist at Phillips Marler has been engaged by City of Parramatta to provide landscape heritage commentary on the development application package submitted for the new Aquatic Leisure Centre at Mays Hill Parramatta.

Julie is assisting Helena Miller, of MG Planning, the independent planner reviewing the project for development approval. The project is being delivered as part of the proposal to replace the Memorial Swimming Baths that were decommissioned and demolished for the construction of the new

Parramatta Stadium.

The following documents have primarily influenced the preparation of this document:-

- Architectural drawings dated 17.11.20 by Grimshaw Architects and Andrew Burges Architect
- Landscape Architectural drawings by McGregor Coxall 17.11.20
- Heritage Impact Statement by Urbis 21.10.20 and Addendum issued on 9.11.20 .
- Heritage Review and Site Analysis - dated 20.10.20

The following advice should be read as additional commentary on the heritage issues that surround the project and sit alongside the General Terms of Approval as provided by HNSW.

SITE LOCATION

The site is located at 7a Park Parade Parramatta within the LGA of City of Parramatta. A triangular landform, the proposed project is located within the Mays Hill Precinct on the south- western section of the domain of Parramatta Park. This section is divided from the rest of Parramatta Park by Park Parade and the Western Railway line to the east, Pitt Street to the east and Good Street to the west.

Parramatta Park is one of the oldest parks in Australia, and has recently undergone many projects to conserve and enhance the park landscape with a wide range of recreational spaces including activated and adapted heritage buildings and precincts, a highly evolved and diverse tree canopy and recreational assets including playspaces.

PROJECT DESCRIPTION

The proposal includes the construction of a new Aquatic Leisure Centre at Parramatta. The scope of works includes site works (cut and fill); tree removal; and the construction of a new aquatic centre comprising a 50m outdoor pool and multiple indoor pools; associated facilities including cafe, health club and program rooms; 203 at grade car parking spaces; bus drop off area; landscaping works and signage.

The project originally formed two separate development applications DA/197/2020: Early Site Works and DA/277/2020: Main Works. DA/277/2020 has however been amended (and consequently renotified) to merge the early works (cut, fill and tree removal) into the subject Main Works application so that the entire project scope is now the subject of a single application.

Specifically, the proposal seeks consent for:

-early works including earthworks comprising cut (up to 10m) and fill (up to 9m) and the removal of one hundred and ninety-six trees and the retaining of 292 trees including tree Jubilee Avenue and the construction of a new Aquatic Leisure Centre comprising:

- 1 x 50m outdoor swimming pool;
- 1 x 25m indoor swimming pool;

- 1 x learn to swim pool;
- 1 x leisure pool;
- pedestrian pathways and bus drop-off area;
- associated pool amenities, including café, health club and program rooms;
- 203 at-grade car spaces, including 4 accessible spaces;
- plant equipment rooms;
- signage
- associated landscape

The new Aquatic Centre will comprise a total floor area of 13,751m² with a gross floor area (GFA) of 6,387m² equating to an FSR of 0.15:1.

HERITAGE LISTINGS

The HIS refers to the following listings which are outlined in some detail in the HIS and are summarised here:-

- The proposed ALCP is to be Located at Mays Hill which forms a significant parcel of land within Parramatta Park. Parramatta Park is listed on the National Heritage Register as one of eleven Australian Convict sites inscribed on the World Heritage List. Mays Hill is noted as outside of the World Heritage List but forms a significant element of open space within the edge of buffer zone of the park.
- The site is listed in Schedule 5 of Parramatta Local Environmental Plan 2011 noted as follows: 'Parramatta Park and Old Government House' (Item No 100596)
- Stage Heritage Register as Parramatta Park including Old Government House (SHR00596)
- May Hill Precinct of Parramatta Park, Mays Hill Gatehouse, Park Parade Gatehouse and
- Governors Avenue are listed on the Parramatta Trust Section 170 register.

SITE SUITABILITY - MAYS HILL

-The inclusion of excerpts of the site suitability report prepared by Suters Pty Ltd as part of the RFI material has been useful in explaining the choice for Zone 2 for the development of the ALCP outlined below:-

-'Careful consideration of form, bulk, scale and materiality will also be a key factor in assessing potential impacts of any new development here. For example, the use of transparent, light-weight materials to allow a high degree of visual permeability would be favourable. The proposal has implemented mitigation measures to ensure the significant landscape features of the Mays Hill precinct.'

-The scale, bulk and permeability of the scheme will be an ongoing design development challenge. Whilst the concealed swimming pool complex is contained in the excavated and filled part of the site – the most prominent element of the design is the north eastern façade and the on grade car parks and the landscaped aesthetic needs to be rigorously developed to ensure that all aspect of the built form and landscape create maximum impact. The careful balance that is envisaged between architecture and landscape will need constant review and consideration in the design development phase.

Recommendation: Ensure that the integrated design of landscape architecture and architecture set within the context of the Parramatta Park remains a rigorous process of review and testing materials for their suitability and is in keeping with the requirements set down in the site suitability report.

HISTORIC ALIGNMENTS AT MAYS HILL

-The Aquatic Centre will be developed in the north of the Mays Hill Precinct, the north of the precinct is significant for the site of grazing for government and private cattle herds. It is significant for the archaeological potential for early fence lines and Domain Creek crossings dating from the Early Colonial Period (Your Parramatta Park 2030).

-A significant historic alignment relating to the early settlement is the Governors Avenue which has been shortened from the 1820 historic alignment running along the ridge to the existing alignment, effectively the section between Mays Hill Gatehouse and Amos Street which forms a boundary to Mays Hills on the south-west.

-Some of the original tree plantings of *Araucaria cunninghamii* planted for Governor Brisbane's observatory are still evident at the Mays Hill Gatehouse end of Governors Avenue. The evolving historic alignments are clearly shown on Page 17 of the Mays Hill Masterplan 2017.

LOCATION AND FOOTPRINT OF THE ALCP

-The location and footprint of the proposed design is greatly extended from the smaller footprint expressed originally in the 2017 Masterplan on Page 48. The former 1820s Governors Avenue alignment runs very close and across the ALCP western boundary. The design expresses this alignment but as meandering path leading to the potential crossing point of the landbridge to Parramatta Park.

-The landscape scheme does not expressly mark the 1820's alignment of the Governors Avenue which the Mays Hill Masterplan shows as a formal pathway leading to the proposed land bridge.

Recommendation: The design should reconsider the 1820s historic alignment of the Governors Avenue through tree planting or by other interpretive means. With the benefits that arise from the cut and fill over the swimming pool complex, a more considered approach to this significant former alignment and its expression is required. The landscape design should adopt the alignment expressed in the 2017 Mays Hill Masterplan as a more formal straight avenue flanked by trees and be sensitive to the possible intervention of the landbridge and the reconnection of the Governors Avenue to the main landscape of Parramatta Park.

MASTERPLAN CONTEXT

The Masterplan for Mays Hill provided effective guidelines for the development of the site. These guidelines encourage a landscape led design, a building within a landscape, activation of views, protection of key views from the ridgelines of Mays Hill and a range of principles which are outlined in the development package and form the basis for development.

Commentary: the ALCP has adhered to the Mays Hill Masterplan (Tyrell Studio) 2017. It is noted that the design of ALCP is larger than drawn in the Masterplan but the cut and cover with a strongly landscaped aesthetic is considered innovative and acceptable to the character of Mays Hill. The form of the design in Mays Hill is supported.

HERITAGE REVIEW AND SITE ANALYSIS

One of the most significant issues in relation to heritage impact on the site is the view corridors and viewshed from Old Government House back to the site. The updated Heritage View and Site Analysis dated 20.10.20 has provided analysis and explanation of a range of view corridors that can be experienced from Parramatta Park and particularly from Old Government House back to the site.

Parramatta Park Observatory Hill and Old Government House

Viewpoints closer within Parramatta Park towards Park Parade have been demonstrated from various locations at Observatory Hill and from the driveway and landscape setting of Old Government house. Image 19 clearly shows that the façade of the Fitness and Wellness Centre will be located at a higher level relative to the ground plane of the Old Government House setting. Whilst it will be possible to see glimpses of the façade on Park Parade, the railway embankment, fencing and other elements limit the views across Park Parade to the façade. Page 31 Sections particularly those taken at RL 41 and from Old Government House show that the form of the building and its location obscures the building behind a large and fairly dense group of trees, to avoid viewing the hard line of the roof from a distance on the Parramatta Park western boundary which means small glimpses of the building and the car park will be visible.

Views across the site from the high points at the back of Mays Hill

-The report provides a visualisation across the site from the high point at Mays Hill towards Parramatta CBD. The benefits of the Aquatic Centre being located into a large excavation is demonstrated. It is not conventional to use an artistic impression rather than a montage over a photograph but notwithstanding it is expected that the landscape qualities of the site will frame views to the city and assist in settling the design into the ground.

-Whilst the top of the walkway is visible from this location, the benefit of existing trees and planted mounded areas settles the design into the landscape. The softer appearance that is denoted in this perspective will be acceptable as it does not detract from the view and enables landscaped glimpses across the city will be possible.

-The lower slopes of Mays Hill are hardly visible from the parklands and are a robust canvas for change.

Views to the Leisure Centre from Park Parade

Page 29 Park Parade Elevation provides the most exposed view of the building to the streetscape and beyond. The materiality of the building has been expressed in three drawings in the package. The long rectangular box form of the building flanked by the large gabion walls seems to fit well into the green

environment but the whiteness of the metal could also look very uniform and glaring in summer sun. This appearance could become more of an issue in the future as the summer glare becomes apparent.

Recommendation: The scale, materiality and appearance of the façade of the building be evolved and refined to ensure that the façade and bulk of the building sits successfully in its context and yet is fit for purpose and its use is legible. Arguably, the white perforated metal of the Wellness and Fitness Centre may make it more prominent in the view than if the colour was darker or more natural in tone. The design development process should explore a variety of colours for the best fit for the site and test that further for visibility at the parklands. The texture of the gabion walls is a complimentary natural material in the heritage environment but texture and type of stones within the gabion needs to be carefully chosen to ensure the appearance does not become too dominant and monolithic. In addition, the car parking which is on grade and highly visible to Park Parade should be sufficiently screened to reduce visibility to the car park.

TREE REMOVAL AND RETENTION

The one hundred and ninety six trees (196) that are proposed to be removed (refer Existing Trees Plan Sheet 01 -updated Heritage View and Site Analysis) are generally confined to low significance trees but two groups of moderate significance trees including one group of *Eucalyptus citriodora* and one group of *Eucalyptus saligna* are located in the centre of the excavated area of the site. The significant planting of *Eucalyptus citriodora* along Jubilee Avenue is not directly affected by the proposed line of cut but is adjacent. There will need to be care taken during construction to avoid damage to these trees, and compensation for the changes to ground water to ensure their long-term survival. In addition, filling and ground works come close to the end of the avenue at the Pitt Street entry. *Syncarpia glomuliferum* trees within the Governors Avenue, also noted as habitat trees will not be affected by the site excavation.

Recommendation: the trees to be removed to enable excavation for the project are substantially of low value with some exceptions noted. The removal is supported. All remaining trees on site particularly those in close proximity to the large excavation should be managed to avoid further tree loss.

LANDSCAPE DESIGN - ENHANCEMENT OF THE TREE CANOPY

The planting plans indicate a range of replacement planting of native trees including *Eucalyptus molucana*, *Eucalyptus tereticornis* which are specified for around 200L to 400L high with a wide range of grasses and ground covers. Screening the car park effectively from Park Parade to reduce glare in the views towards Parramatta Park will be an important component in the design and development of the project to ensure minimum heritage impact to the view corridors.

The HIS (page 8) comments that tree planting will be planted at 3 trees to every one removed. 196 trees are being removed and 299 are being planted. It is understood that the 190 *Bursaria spinosa* trees are part of the 299 new trees. It is argued that this species grow as dense multi stemmed large shrubs rather than trees and are planted in a large thicket wrapping around the ring opening. These will not provide the substantial canopy tree which are sought as replacement to removed trees. In addition, large canopy trees

have been removed from the bus parking bays and the car park which limits the screening of trees on this important façade.

Recommendation: The design proposal to include a range of native trees planted at 400L or larger is supported. However, the proposed reduction of trees around the bus parking area and within the proposed on-grade car park is not supported. Design development needs to be undertaken to show the reinstatement of trees at the front façade of the building to ensure that the screening that was originally proposed for the project is maintained and to adhere to the design intent to plant three trees for every tree that is removed (as outlined in the Heritage Impact Statement). The extensive use of *Bursaria spinosa* to increase the number of new trees is not supported and it is suggested that the design considers the use of additional single stem trees drawn from the specified list to ensure that the augmentation of the trees canopy is retained in keeping with the design excellence principles of the project.

HISTORICAL ARCHAEOLOGY

Cultural Resources Management - Letter dated 24th August 2020 re: Historic Period Archaeology proposed new Aquatic Centre, Mays Hill Parramatta Response to Heritage NSW RFI (Ref: CNR-7144 A-9163)

-Advice was sought following HNSW comments regarding the lack of historic archaeological advice and commentary, in regards to impacts to the project.

-The application should include a short letter prepared by an historical archaeologist. The short letter should address the results of the 2018 testing program, the anticipated resource, consider the listed values of the SHR and the potential impact.

-Wendy Thorp confirms her advice referring to her role as the excavation director for the testing program of works and author of all reports pertaining to the historic period archaeology of this site.

-There is no anticipated archaeological resource of state significance within the project area

-The site has been developed twice in the twentieth century for a golf course and the evidence which remains on the site is largely confined to introduced soil and grass laid to create fairways, bunkers etc. This profile is generally less than one metre in depth. This resource has no technical or research values

-The site retains its historical associations with the state significant values identified in numerous assessments but the physical evidence does not embody this significance or is able to investigate or exemplify it.

-The proposed development will effectively remove all of the introduced soil and works from the golf club

-This work has no impacts to the state significant values of the place or any archaeological values

-No further archaeological work is required other than application for a s57 (2) exemption for excavation in respect of archaeological relics

-A strategy is required to be adopted in the event of an unexpected find which will need management under the provisions of s146 of the Heritage Act NSW requiring submission of a form for the Notification of the Discovery of a Relic.

Recommendation: The response from CRM clarifies outstanding issues around historical archaeology and is supported.

SOLAR PANELS

To meet ESD requirements additional solar panels are required to be placed on the roof of the building (refer Roof Drawing A-03-1004.) The extent of panels needs to cover more roof area than the exposed roof of the Health and Wellbeing Centre which potentially proliferate the appearance of the solar panels on the roof. As it has been demonstrated there will be minimal impact of the Health and Wellness façade on the wider views to Old Government House and Observatory Hill. Therefore the additional infrastructure is likely not to increase impact. However, the angle of the surface of solar panels can cause reflection which should be considered and minimised during design development, as well as interrupt the roofline impacting views across Mays Hill and short distance views looking north from Park Parade.

Recommendation: The use of solar panels on the roof is supported from an ESD perspective but further design development and testing for possible reflectivity and methods to reduce visibility should be considered.

CONCLUSION

The report has found that the architectural and landscape design for the ALCP is generally supported from a heritage perspective. The swimming complex with its landscaped mounding and surrounds fit well within the park setting and is innovative in its approach to the views.

The Wellness and Fitness Centre which is an expressed form on the highly sensitive eastern flank of the development needs more resolution and testing as the design evolves. Attention to the form, materiality and necessary function of the facade as it meets Park Parade will need careful design development to manage the view corridors from Parramatta Park and be a discreet but legible building.

Issues of around tree removal and replacement and the expression of the 1820s Governors Avenue alignment also need design review to ensure that the ALCP will fit successfully into the Mays Hill landscape.

DRAFT CONDITIONS FOR DA APPROVAL

1. Ensure that the integrated design of landscape architecture and architecture located within the context of Parramatta Park remains a rigorous process of review and testing the design in all its aspects for their suitability and is in keeping with the recommendations set down in the Site Suitability report prepared by Sutera Architects.
2. The scale, materiality and appearance of the façade of the Health and Wellness building needs to be evolved and refined to ensure that the façade sits discreetly in its context and yet is fit for purpose and its use is clearly legible. Arguably, the white perforated metal of the Wellness and Fitness Centre may make it more prominent in the view than if the colour was darker or more natural in tone. The design development process should explore a variety of colours for the best fit for the site and test that further for visibility from Old Government House and beyond. The texture of the gabion walls is a complimentary natural material in the heritage environment but texture and type of stones within the gabion needs to be carefully chosen to ensure the appearance does not become too dominant and monolithic. In addition, large canopy

trees have been removed from the bus parking bays and the car park which limits the screening of trees on this important façade.

3. The trees to be removed to enable excavation for the project are substantially of low value with some exceptions noted. The removal is supported. All remaining trees on site particularly those close to the large excavation should be managed to avoid further tree loss.
4. The design proposal to include a range of native trees planted at 400L or larger is supported. However, the proposed reduction of trees around the bus parking area and within the proposed on-grade car park is not supported. Design development needs to be undertaken to show the reinstatement of trees at the front façade of the building to ensure that the screening that was originally proposed for the project is maintained and to adhere to the design intent to plant three trees for every tree that is removed. The extensive use of *Bursaria spinosa* to increase the number of new trees is not supported and it is suggested that the design considers the use of additional single stem native trees in the mix to ensure that the augmentation of the site with large trees is retained to continue the design excellence of the project.
5. The design should reconsider the 1820 historic alignment of the Governors Avenue through tree planting or by other interpretive means. With the benefits that arise from the cut and fill over the swimming pool complex, a more considered approach to this significant former alignment and its expression is required. The landscape design should consider the alignment as shown in the 2017 Mays Hill Masterplan as a more formal straight avenue flanked by trees and be sensitive to the possible intervention of the land bridge and the future reconnection of the Governors Avenue to the main landscape of Parramatta Park.
6. The use of solar panels on the roof is supported from an ESD perspective but further design development and testing for possibly reflectivity and methods to reduce visibility should be considered.

Kind regards



Julie Barker
Landscape Architect