

11 December 2018

Mr Brian Booth  
Executive Design Manager  
Paynter Dixon Constructions  
Level 2, 2 Richardson Place  
NORTH RYDE NSW 2113

Our Ref: 17-0254Gbbc2

**Re: Parramatta RSL Club Redevelopment, S4.55 (2) Modification  
Application—Heritage Impact Statement**

Dear Mr Booth,

We understand Paynter Dixon Constructions is submitting a S4.55 (2) for proposed first floor modifications to the approved Parramatta RSL development. GML Heritage Pty Ltd (GML) has been engaged to prepare a Heritage Impact Statement to accompany the submission to the City of Parramatta Council (Council).

The following heritage impact assessment evaluates the proposed modifications against the approved development and provisions in the following heritage management document:

- Planisphere, 'Development in Parramatta City and the Impact on Old Government House and Domain's World and National Heritage Listed Values Technical Report', 2012 (Planisphere 2012).

**Background**

Redevelopment of the Parramatta RSL club located at 2 Macquarie Street (the RSL site) includes construction of a new club building, open air and basement car parking. The site is adjacent to the UNESCO world heritage listed Parramatta Park. Heritage and archaeological impact assessments were prepared for the Development Application (DA) in 2013:

- Urbis, 'Heritage Impact Statement, Proposed Hospitality Venue, 2 Macquarie Street, Parramatta', December 2013 (Urbis 2013);
- Artefact Heritage, 'Parramatta RSL Club, Non-Aboriginal Archaeological Impact Assessment', September 2013 (Artefact 2013a); and
- Artefact Heritage, 'Parramatta RSL Club, Aboriginal Archaeological Assessment', September 2013 (Artefact 2013b).

Development consent was granted in 2015 (DA/805/2013). Stage 1 development commenced in 2017 and is ongoing.

Modifications to the approved ground floor, first floor and roof level design are now proposed. An assessment of potential heritage impact of the proposed

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modifications is required as part of the submission to Council (LEP 2011 Part 5 Clause 5.10 Heritage conservation).

### **Heritage Context**

The RSL site is not included as a heritage item in Schedule 5 of the Parramatta Local Environment Plan 2011 (LEP 2011). It has however been assessed as having state and national heritage significance for its archaeological and research potential, historical and associative significance (Urbis 2013). It includes rare archaeological remains of former convict hut allotments dating between 1790 and 1823. Within the site, the c.1888 palisade fence with sandstone base along the O'Connell Street and Macquarie Street frontage has historic and aesthetic significance as part of the Domain boundary fencing.

The RSL site is adjacent to Parramatta Park—a place of State, National and World Heritage significance—which is included in the following heritage listings:

- 'Parramatta Park and Old Government House'—Schedule 5 of Parramatta LEP 2011 (ID No. I00596);
- 'Parramatta Park and Old Government House'—listed on the NSW State Heritage Register (ID No. 00596); and
- 'Old Government House and Domain'—listed on the National Heritage List (NHL) (ID No. 10597) and part of the Australian Convict Sites World Heritage Listing.

The site is in the World Heritage buffer zone within highly significant view cones from Old Government House towards the city (Figure 1) and Bath House area towards the city (Figure 2) (Planisphere 2012).

### **Approved Development Heritage Impact**

The approved new hospitality venue development comprises a two-storey building with roof terraces over one basement level on the eastern part of the site (Stage 1), ground level carparking over three basement car park levels on the western part (Stage 2), and associated landscaping.

The 2013 Urbis report concluded the development would have a minor heritage impact to the c.1888 palisade fence and no negative impacts to the adjacent State, National and World Heritage listed Parramatta Park, Old Government House and Domain:

*The building is carefully designed to have minimal and less impact than the previous structure on the views from the adjacent heritage item, Parramatta Park, Old Government House. The architectural form is carefully designed to sit low in the landscape behind the existing tree line. The siting of the new building is to the east of the site, towards the CBD situated further from the park and Government House than the previous and higher structure further reducing the buildings visibility. Additional screening planting to the north and west is also proposed to further screen built form. The new structure is only slightly visible from government house and has no negative impact on views.*

*Due to the above the proposal has been assessed to have minor impact to the palisade fence and no negative impacts to the adjacent highly significant UNESCO listed site, Old Government House and the Domain. (Urbis 2013, p1)*

The 2013 Artefact reports conclude the development would remove all archaeological remains and impact archaeological significance.



**Figure 1** Significant view cone (View 1) from Old Government House towards the city with the site outlined in blue. (Source: Planisphere 2012 with GML additions)





## Proposed Modifications

The proposed modifications are to all floors and roof level. The first floor would be extended and the outdoor plant room reduced to accommodate function rooms on the west elevation. The new roof form would be flat with a horizontal fascia facing the carpark and parapet on the Macquarie Street elevation. The first floor extension would have a darker finish to the ground floor stone cladding. Internal modifications include additions to the lift and stairs to access the function rooms, relocation of administration from the ground floor to the basement, and other modifications to the internal features on the ground floor.

The proposed modifications are:

- Addition of first floor function rooms and associated access
- Roof extension to accommodate the first floor function rooms
- Eaves removed and external wall raised to form a parapet
- Addition of egress stairs between first floor and ground level
- Lift extension to service the first floor
- Relocation of administration from the ground floor to the basement level.

Drawings prepared by EJE Architecture and reviewed for this report are:

- Basement 1—CTL 0303 DA142 08 06/12/18
- Ground Floor—CTL 0303 DA143 09 06/12/18
- First Floor—CTL 0303 DA144 07 06/12/18
- Roof Plan—CTL 0303 DA145 06 06/12/18
- Elevations—CTL 0303 DA200 05 06/12/18
- Sections Sheet 1—CTL 0303 DA300 06 06/12/18
- Sections Sheet 2—CTL 0303 DA301 06 06/12/18

## Heritage Impact Assessment

The proposed modifications do not alter the building height or siting. However, they include changes to building form. The impact of the proposed first floor and roof extension on significant views from and within Parramatta Park need to be considered. Relocation of the administration to the basement, and internal lift, stair and other modifications do not affect the heritage significance of the site or adjacent Parramatta Park. The assessment of heritage impact of proposed modifications is presented in the tables below.

## Planisphere 2012

Provision	Comment
2 Views & Settings - Areas of Sensitivity	<p>The development is located within the World Heritage buffer zone of Old Government House and Domain, Parramatta Park.</p> <p>The site is located in an area identified as "highly sensitive" as it is prominent "within the foreground" of a view and affected by multiple important view cones. Highly sensitive areas are areas where details of built form are more pronounced and have a high risk of resulting in a significant impact upon the World and National Heritage values".</p> <p>The site is within the view cones for:</p> <ul style="list-style-type: none"> <li>- Old Government House towards the city (p44)</li> <li>- Old Government House courtyard towards the city (p46)</li> <li>- Bath House to city (p54).</li> </ul>
3 Future Development Guidelines - Design Principles	<p>New development should not dominate the landscape setting of Old Government House and Domain or detract from the mostly 'green' outlook north, allowing the Domain to retain its existing landscape character.</p> <p>The approved development will be located further east than the current RSL building and sit lower in the landscape behind the tree line. It will be visible from adjacent areas within Parramatta Park and partially visible from Old Government House.</p> <p>The proposed first floor extension alters the massing and roof form in the south west corner of the building. The proposed modifications are within the height limit and would not increase the bulk of the approved building. The proposed first floor extension is significantly setback from Macquarie Street entrance to Parramatta Park. The proposed modification would not increase the visual impact as assessed by Urbis 2013 (pp39-40) and of the approved development.</p> <p>The proposed first floor extension modifications must utilise external colours and finishes that immerse the building within its setting and minimise contrast with the surrounds (such as neutral muted colours and matt finishes) to not increase visual impact or affect significant views.</p>
3 Future Development Guidelines - Park Edge (highly sensitive) – A4 RSL development guidelines	<p>Proposed modifications do not change the approved height limit of 10m. The proposed modifications do not alter the bulk of the approved building or its siting in the east on the O'Connell Street frontage.</p>

## Parramatta Development Control Plan 2011

Provision	Comment
3.5 Heritage	<p>The proposed modifications do not alter the curtilage, scale and height, or siting of the approved development. The first floor and roof extension would alter the form and massing in the south west of the building. However, the proposed modifications do not increase the height or bulk of the approved development.</p> <p>The external materials and finishes of the proposed modifications should be carefully considered as they would be partially visible in the Old Government House view cone. They should be in neutral, recessive colours in matt finish to avoid additional visual impact.</p> <p>There are no further archaeological impacts resulting from the proposed modifications. The requirements of the <i>Heritage Act 1977</i> and <i>National Parks &amp; Wildlife Act 1979</i> are being addressed as part of the overall development program.</p>

**Parramatta Local Environmental Plan 2011**

Clause	Comment
5.10 Heritage Conservation	<p>The proposed modifications comply with the objectives and do not change the overall evaluation of the development against the LEP clauses in Urbis 2013 (pp32-34).</p> <p>Massing and form modifications in the south west corner of the building do not increase the heritage impact of the approved development on Parramatta Park or to significant views from Old Government House and the Bath House area.</p> <p>There are no further archaeological impacts resulting from the proposed modifications. The requirements of the <i>Heritage Act 1977</i> and <i>National Parks &amp; Wildlife Act 1979</i> are being addressed as part of the overall development program.</p>

## Conclusions

- The proposed modifications are consistent with the existing development approval and the heritage impact assessment (Urbis 2013), and would not result in a significant impact to the State, National and World Heritage values of Old Government House and Domain, Parramatta Park.
- The approved development and proposed modification will be visible from adjacent areas within Parramatta Park and partially visible from Old Government House.
- There are no additional archaeological impacts to those identified as part of the development approval (Artefact 2013a-b) and subject to current and future requirements of the *Heritage Act 1977* and *National Parks & Wildlife Act 1979*.

## Recommendations

- The approved development and proposed modifications must utilise external colours and finishes that immerse the building within its setting and minimise contrast with the surrounds (such as neutral muted colours and matt finishes) to protect significant views.

Yours sincerely

**GML Heritage Pty Ltd**



**Abi Cryerhall**  
Principal