19 June 2017

Interim General Manager
City of Parramatta
PO Box 32
Parramatta NSW 2124

By email: parramattanorth@cityofparramatta.nsw.gov.au

Dear Sir/ Madam,

Draft Development Control Plan and Development Application DA/1124/2016 for the Parramatta North Urban Transformation Precinct

ICOMOS – the International Council for Monuments and Sites – is a non-government professional organisation that promotes expertise in the conservation of cultural heritage. ICOMOS is also an Advisory Body to the World Heritage Committee under the World Heritage Convention. Australia ICOMOS, formed in 1976, has over 600 members in a range of heritage professions and is amongst the largest of the over 100 national committees of ICOMOS.

The Parramatta North precinct is an important Australian historic heritage site that includes intact examples of cultural heritage dating from the earliest Colonial period to the present day. Australia ICOMOS is therefore concerned at the unseemly haste to assess the Development Application (DA) while details of the Development Control Plan (DCP) for such a complex site remain to be fully resolved.

Australia ICOMOS will not comment on the detail of the DCP or the proposed redevelopment, although we note that they have attracted criticism from heritage and environmental groups and respected authorities who are concerned that significant values of many of the original buildings, and the site as a whole, may be jeopardised. We do though wish to raise our concern that best heritage practice may have been compromised during the design and approvals process, and that the policies and recommendations for retention of many significant buildings proposed by the Conservation Management Plan have not been adopted in the DCP or by the proposed development.

Specifically the following issues of concern should be addressed and resolved as part of the DCP before any DA assessment process commences:

- The Conservation Management Plan (CMP) is a massive document, and this will inhibit its accessibility to the community and user groups. A distilled version summarising the important policy recommendations would greatly enhance the effectiveness of the CMP.

- More concerning however are the contradictions between the CMP and the DCP, particularly with respect to demolition - a large number of items of ‘moderate significance’ which are proposed for retention by the CMP are marked for demolition in the DCP, and the proposed development. These include many notable 20th century buildings of the Cumberland Hospital.

- The Heritage Impact Statement emphasises the importance of views, vistas and open space. Yet within Development Lots F1 and F2, adjacent to the riverfront, 10 metre high building envelopes are advocated. New development in these locations will severely impact on the 1 and 2 storey heritage buildings and their surrounds, and obscure their visual relationship to the riverfront.
High-rise buildings are proposed throughout the site in close proximity to identified heritage buildings, and overall there appears to be an undue emphasis on achieving maximum possible density of new development. Insufficient consideration has been given to the open space, cultural landscape and curtilages essential for heritage elements to maintain their heritage significance.

Two sites for buildings of 13-14 metres in height are proposed in the Historic Core; F6 and F7. Any development apart from sensitively conceived adaptive reuse of existing buildings should be strenuously resisted within the Historic Core. The buildings of the Historic Core are now proposed for National Heritage Listing and further evaluation and scrutiny may determine that the site meets criteria for World Heritage listing.

The high-rise zones of Development Lots H1 to H5 are close to the street frontage on the eastern side of the Historic Core. This zone allows development up to 66 metres, with a transition zone of 25 metres, and thus has the potential to create overshadowing and detrimental visual impact on the low-rise buildings within the Historic Core. Building envelopes for high-rise development should be reviewed, and modelling further articulated, with increased setbacks and transition zones at the western side of the new precinct.

It is of great concern to Australia ICOMOS that a site of such size and complexity, but above all of such exceptional heritage significance, has been subjected to planning policies and development proposals before adequate time has been allowed for the necessary assessments, including detailed archaeological investigation and full evaluation by the community. We question whether the process of simultaneous assessment has been in the public interest, and whether best possible outcomes are assured to preserve and present this unique precinct for future generations.

Australia ICOMOS also supports the submissions by the National Trust and the Australian Institute of Architects (AIA) and Australian Institute of Landscape Architects (AILA) with respect to certain aspects of the DCP and the proposed development by UrbanGrowth.

Yours faithfully

MR IAN TRAVERS
President, Australia ICOMOS