11 August 2013

Department of Planning and Infrastructure NSW

ONLINE SUBMISSION

Dear Sir/Madam

Re:  MP 10_0171 MOD 3 - Mixed Use Residential Development – Meriton Apartments Pty Ltd,
Residential Development, 330 Church Street, Parramatta, NSW

Thank you for the opportunity to comment on this proposal. I provide this letter as a submission on behalf of Australia ICOMOS.

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, is one of over 100 national committees throughout the world. Australia ICOMOS has over 500 members in a range of heritage professions. We have expert members on a large number of ICOMOS International Scientific Committees, as well as on expert committees and boards in Australia. We have a particular interest in Australia’s world heritage sites.

We note that this referral relates to the same development in Referral No. 2011/6166 and Referral No. 2012/6358, although this proposal involves a substantial increase in height of the towers, increasing the height of the East Tower by 24.8 metres to RL 116.3m and the West Tower by 59.5 metres to RL185.1m. Our previous concerns with the development are now greatly increased by this current modification proposal which dramatically increases the height.

We have referred to The Old Government House Views and Settings study (2012) by Planisphere and highlight that this document has used as its basis the existing Parramatta City Centre LEP 2007 which states that for the zone where the development is to be located, the maximum building height is 80 metres. It must be assumed that this has been the standard against which development impacts have been measured in that study.

I refer to your correspondence of 1 July 2013 which notes that the applicant is now seeking approval to increase the East Tower to RL 116.3m and the West Tower to 185.1m. Our previous concerns with the development are now greatly increased by this current modification proposal which dramatically increases the height.

We have referred to The Old Government House Views and Settings study (2012) by Planisphere and highlight that this document has used as its basis the existing Parramatta City Centre LEP 2007 which states that for the zone where the development is to be located, the maximum building height is 80 metres. It must be assumed that this has been the standard against which development impacts have been measured in that study.

I refer to your correspondence of 1 July 2013 which notes that the applicant is now seeking approval to increase the East Tower to RL 116.3m and the West Tower to 185.1m. The latter is more than double the 80 metre height against which the view analysis has been assessed.

We further note that the Planisphere report has assessed the views from Old Government House across to the proposed development site as being of either high or moderate significance in relation to the site’s heritage values (summarised p. 31). However, the report locates the development in the ‘middle ground’ and suggests that: Development in these areas may have some impact, but there is no risk of resulting in a significant impact upon the World and National Heritage values (p. 80). The justification for this assessment is included on the same page, based on a consideration that visual impact reduces with distance. It is equally arguable that while distance will decrease visual impact, increasing the size of a feature in that view line will concomitantly increase visual impact. As the original assessment has a baseline of an 80 metre height, we argue that it is not valid to assume there will be no impact on heritage values if the height is more than double that on which the original assessment was based.
Hence we suggest that there is indeed a potential for this increased height to detrimentally impact on the setting of Old Government House and Domain, Parramatta Park, and negatively affect the place’s heritage values, including World Heritage values. The current referral documentation cannot rely on existing view line analyses and has not addressed the impact of this newly proposed amendment in height on the setting of Old Government House and Domain, Parramatta Park.

The heritage significance of this important and valuable part of our cultural heritage is linked to the retention of this significant setting.

As stated in our previous submissions, the Australian government is aware that the impact on heritage values of developments in areas surrounding a World Heritage property is of interest and can be of serious concern to the UNESCO World Heritage Committee. In the Australian context this has recently been reinforced by the Reactive Monitoring Mission to review actions in relation to the Great Barrier Reef World Heritage Area. We are confident that the Australian government would not wish to attract a similar mission or questions in the case of the Australian Convict Sites World Heritage property. Paragraph 172 of the Operational Guidelines provides a mechanism to refer concerns from State Parties – particularly ‘new constructions which may affect the outstanding universal value of the property’ – and we urge the Australian government to take this opportunity to seek feedback from the World Heritage Centre in a timely way. This would seem an appropriate step to take given the identification of potential development impacts at the time the Australian Convict Sites was added to the World Heritage List. We once again bring your attention the text from the 2010 ICOMOS Assessment report, under the heading ‘Development pressures’:

More broadly, some of the sites within the property may be threatened by the development of the property’s peripheral area and in its buffer zone, notably in terms of the landscape impact of growing urban environments (see Integrity). This refers in particular to the City of Sydney for Hyde Park Barracks (3) and Cockatoo Island (10), to Parramatta city for Old Government House (2) ...

(emphasis added)

In conclusion we make the following recommendations:

1. Prior to this modification to the development being determined, the Old Government House Views and Settings study (2012) is reviewed to assess the impact of buildings at heights over 80 metres, which is the current maximum assessed in zone 3, the location of this development.

2. Under Paragraph 172 of the Operational Guidelines, a mechanism is provided to refer concerns from State Parties, particularly ‘new constructions which may affect the outstanding universal value of the property’, and we urge the Australian government to take this opportunity to seek feedback from the World Heritage Centre on this development in a timely way.

Thank you again for your consideration of the views of Australia ICOMOS on this important issue.

Yours faithfully

MS ELIZABETH VINES OAM, FRAIA, MICOMOS
President, Australia ICOMOS

Cc
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