27 November 2013

Ms Coleman and Ms Weatherley
Acting Chief Executives
Parramatta City Council
PO Box 32
Parramatta NSW 2124

Attention: Land Use Planning

By email: council@parracity.nsw.gov.au

Dear Ms Coleman and Ms Weatherley,

DRAFT PLANNING CONTROLS - 2 MACQUARIE ST, PARRAMATTA & PARK EDGE SPECIAL AREA, PARRAMATTA CITY CENTRE AND DRAFT CONSERVATION AGREEMENT - OLD GOVERNMENT HOUSE & DOMAIN PARRAMATTA

**Australia ICOMOS** (International Council on Monuments and Sites) is a non-government, not-for-profit organisation of cultural heritage professionals formed as a national chapter of **ICOMOS International** in 1976. Australia ICOMOS’ mission is to lead cultural heritage conservation in Australia by raising standards, encouraging debate and generating innovative ideas.

Australia ICOMOS appreciates the opportunity for public consultation on the draft planning controls and a draft Conservation Agreement which relate to the protection of the World and National Heritage values of the site known as **Old Government House and Domain** at Parramatta.

1. **PROPOSED HEIGHT CONTROLS - 2 MACQUARIE STREET PARRAMATTA.**
   The Planisphere Study indicates that new development on the RSL site should “create a positive interface between OGHD and the Parramatta CBD and respect the heritage values of its setting”. Australia ICOMOS notes that there is currently no height control on the subject site (Parramatta RSL site). While Australia ICOMOS generally supports the proposed new planning controls to limit the building height on the RSL site to below the adjacent tree canopy (i.e. 10 metres), Australia ICOMOS promotes a more detailed consideration of the impact of any new development on the RSL site (i.e. a site Masterplan within a DCP).

2. **DRAFT DCP CONTROLS FOR PARK EDGE SPECIAL AREA, PARRAMATTA CITY CENTRE**
   Australia ICOMOS generally supports the proposed changes to the Parramatta City Centre Development Control Plan (DCP) 2007 with the following exceptions:

   **Area A.1– Parramatta Leagues Club Site and Area A.2 – Parramatta Stadium Site, Parramatta Pool and Car Park**
   There are important distant views from Parramatta Park to the north and north-east. Australia ICOMOS recommends that there be strict controls on developments on these sites so that 100% (rather than only 80%) of the building height is below the surrounding established tree canopy.
Instead it is recommended there be a similar clause as for Area B:

Minor departures exceeding the above built form controls [i.e. 100% below the surrounding established tree canopy] (by up to 5%) ... will only be permitted where the consent authority is satisfied that the visual impact of the proposed development will not visually dominate OGHD as a result of any such variation when the proposed development is viewed from any of the key viewing locations from OGHD shown in Figure 2A.

Area B
Australia ICOMOS generally supports the controls for Area B.

Area C Lot 362 DP 752058, No. 2 Macquarie Street Parramatta (RSL Site)
Historically the corner of O'Connell and Macquarie Streets was part of the Government Domain at Parramatta and currently this relationship can still be read. Changes to this site are a great opportunity to reinforce the open space network that forms the Governor’s Domain in Parramatta Park.

Australia ICOMOS considers that more consideration should be given to permissible new development on the RSL site at 2 Macquarie Street. In particular Australia ICOMOS does not support the proposal for a “0” (zero) setback along the O'Connell Street and part of the Macquarie Street frontages.

There needs to be a site specific Masterplan developed for the RSL site that is exhibited and approved by all of the Conservation Agreement parties, prior to any development application for the RSL site being considered.

3. DRAFT CONSERVATION AGREEMENT - OLD GOVERNMENT HOUSE & DOMAIN PARRAMATTA
Australia ICOMOS considers that further consideration should be given to the above issues before a Conservation Agreement is entered into by the relevant parties.

CONCLUSION
Australia ICOMOS notes that the World Heritage Listing for the Australian Convict Sites World Heritage Property, of which Old Government House and Domain is one of (of the eleven sites in total), contains the following comments:

Looking at the landscape perspectives and horizon lines, the urban environment significantly alters the property’s integrity at several sites, …

More broadly, [OGHD] 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.

As stated in our previous Australia ICMOMOS submissions on development controls in Parramatta, 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.

Overall Australia ICOMOS conclude that there is insufficient analysis of some of the potential development impacts that may result from the advertised planning changes and the proposed Conservation Agreement.

Yours faithfully

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