

REPORTS TO COUNCIL - FOR COUNCIL DECISION

ITEM NUMBER	13.7
SUBJECT	Preparation of the Comprehensive Heritage Review (Scope)
REFERENCE	F2024/00282 - D09392137
REPORT OF	Project Officer Land Use

CSP THEME: Innovative

WORKSHOP/BRIEFING DATE: 15 November 2023 and 19 February 2024

PURPOSE:

To seek Council's endorsement of the scope of a comprehensive heritage review for the City of Parramatta Local Government Area (LGA).

RECOMMENDATION

That Council approves the scope for the Comprehensive Heritage Review of the City of Parramatta Local Government Area, as detailed at Table 1 of this report.

BACKGROUND

1. Council on 23 October 2023 resolved as follows:
 - (a) *That the Chief Executive Officer prepare a scope that includes an estimated cost and timeline for the preparation of a comprehensive heritage review for the Parramatta local government area. The comprehensive heritage review should include, but not be limited to a review of heritage listings and heritage related controls including those that apply to Heritage Conservation Areas.*
 - (b) *That this scope be presented to Councillors before 31 March 2024 to inform the 2024/2025 DPOP and budget processes.*
2. In accordance with the above Council resolution, a draft scope for a comprehensive heritage review was presented to Councillors at a workshop on 19 February 2024, in accordance with part (b) of the resolution, and feedback from that workshop was incorporated into the FY2024/25 budget process.
3. A foundation comprehensive heritage review undertaken for the (former) Parramatta LGA by Meredith Walker and Associates (including Terry Kass and Dr Carol Liston) in 1993 (now 31 years ago) has provided the framework for heritage planning in the City of Parramatta LGA ('the City') over many years.
4. This initial review identified and analysed the heritage of the City (focused on European heritage) and made recommendations for conservation and management. In addition, the review included a historical overview of development divided into themes.
5. In August 2014 (10 years ago), Mary Dallas Consulting Archaeologists completed the Parramatta Aboriginal Cultural Heritage Study Review of Aboriginal heritage management procedures and the information and mapping

on which these are based. Council at its meeting of 14 November 2016 resolved to exhibit proposed amendments to the Parramatta DCP 2011 in relation to Aboriginal heritage management along with the Parramatta Aboriginal Cultural Heritage Study Review. Following the exhibition and consultation process with First Nations groups, these amendments to the Parramatta DCP 2011 were adopted by Council on 24 September 2018.

6. Council's last extensive heritage review was reported 13 years ago in 2011. That review focused on validating existing listings, updating heritage inventories, adding and removing a small number of items, and consideration of a new heritage conservation area in North Parramatta. It should be noted that this review was more limited in scope than the foundation comprehensive heritage review undertaken in 1993, and also the review that is currently being proposed to Council through this report.
7. Between 2006 and 2023, there have been a number of heritage studies undertaken by Council for specific areas and subjects of the City of Parramatta LGA, as detailed at **Attachment 1**.
8. A draft Integrated Heritage Strategy (IHS) was prepared in 2019 by consultants, GML Heritage, but was not endorsed by Council at that time. Council's *Local Strategic Planning Statement (2020)* already includes 'Action A52' to complete the draft IHS for community consultation. It is envisaged that the draft IHS could be finalised in the first year of the comprehensive heritage review. The purpose of the IHS will be to set out the vision for Council's heritage, Council's heritage management responsibilities, statutory and planning context, historic and contemporary context, guiding principles, opportunities, and a prioritised action plan for heritage matters.

REVIEW METHODOLOGY

9. A detailed Project Delivery Plan will be finalised once this has been endorsed by Council to help guide and manage the project but the Key Element of this plan is the workplan included in Table 1 of this report.
10. In order to prepare the workplan and cost estimates the following has been pursued:-
 - (a) Extensive consultation has been undertaken with relevant staff in Council's City Planning and Design and Community and Cultural Services Directorates. Consultation has also been undertaken with external agencies, including Heritage NSW, National Trust (NSW), Museums of History NSW, Greater Sydney Parklands, and Sydney Olympic Park Authority (SOPA) to determine the workplan.
 - (b) Consultation has been undertaken with Council officers from a number of other Sydney councils, such as Hornsby Shire, Inner West and Ryde Councils, and heritage professionals through an online heritage forum group. Information has been obtained on costings of comparable heritage studies and challenges and lessons learnt from undertaking similar reviews.
 - (c) A review has been undertaken of best practice guides nationally on how to undertake comprehensive heritage reviews. This includes the guide

prepared by the NSW Office of Environment and Heritage titled, '*Community-Based Heritage Studies: a Guide*' (2013). These guides emphasise the importance of appropriate definition of project scope, community engagement, and preparation of a thematic history study.

WORK PROGRAM – SCOPE, ESTIMATED COSTS AND TIMING FOR THE REVIEW

11. The proposed scope of the comprehensive heritage review, including tasks, estimated costs and timing, is detailed in the Work Program at Table 1 below. The review is proposed to be undertaken over six years and will cost an estimated \$870,000. Estimated costs in Table 1 have generally been informed by discussions with other local councils on comparable heritage studies which have been undertaken in recent times.

Table 1: Work Program – Tasks, Estimated Costs and Timeline for the Review

Year 1 (2024/25) – Establish Heritage Strategy and undertake Heritage Conservation Areas (HCAs) Review (Timeframe 1 year)

Main Tasks	Estimated Cost	Target Year(s)
Integrated Heritage Strategy (update and finalise)	\$10,000	2024/25
Heritage Conservation Areas (HCAs) Review	\$140,000	2024/25
Preliminary community engagement – Phase 1	Within existing budget	2024/25
Year 1 Subtotal	\$150,000	

Years 2-4 (2025/26, 2026/27, 2027/28) – Thematic History Study and Listings Review (Timeframe 3 years)

Main Tasks	Estimated Cost	Target Year(s)
Thematic History Study (including indigenous and non-indigenous history)	\$100,000	2025/26
Heritage Items Review:		
(1) Review existing items:		
• Part A (South) – Parramatta, Dundas & Rosehill Wards	\$100,000	2025/26
• Part B (North) – North Rocks and Epping Wards		–
(2) Investigate new items and prepare inventory sheets (whole LGA)	\$100,000	2026/27
	\$100,000	
(3) Engagement Phase 2 – Study Outcomes (heritage items and conservation areas reviews)	\$12,500	
Heritage Inventory Sheets Review and Update (for the former The Hills and Holroyd LGAs only)	\$65,000	2026/27
Amend Planning Controls:		
(1) Process Draft LEP and DCP changes (including new listings, changes to existing listings, conservation area changes, draft planning controls)	Within existing budget	2026/2027 – 2027/28
(2) Listings Review – Engagement Phase 3 (during public exhibition of LEP/DCP changes)	\$12,500	2027/28
Years 2-4 Subtotal	\$490,000	

Year 5 (2028/29) – Aboriginal Heritage Study and Archaeological Study (Timeframe 1 year)

Main Tasks	Estimated Cost	Target Year(s)
Aboriginal Heritage Study	\$110,000	2028/29
Aboriginal Heritage - Engagement	\$20,000	2028/29
Archaeological Study	\$100,000	2028/29
Year 5 Subtotal	\$230,000	

Year 6 (2029/30) – Implementation of Aboriginal Heritage Study and Archaeological Study (Timeframe 1 year)

Main Tasks	Estimated Cost	Target Year(s)
Process Draft LEP and DCP changes arising from Aboriginal Heritage Study and Archaeological Study	Within existing budget	2029/30
Year 6 Subtotal	Within existing budget	

Total Overall Estimated Project Cost

Main Task	Estimated Cost	Target Year(s)
Comprehensive Heritage Review	\$870,000	2024/30
TOTAL	\$870,000	

NSW GOVERNMENT'S HOUSING REFORMS AND POTENTIAL IMPACTS ON HERITAGE CONSERVATION AREAS

12. As part of the NSW Government's housing reforms, *State Environmental Planning Policy (Housing) Amendment (Dual Occupancy and Semi-Detached Dwellings) 2024* (SEPP) came into effect on 1 July 2024. Dual occupancies are now permitted within all Heritage Conservation Areas (HCAs), but not on properties that are individually listed heritage items.
13. Consequently, it is considered necessary to prioritise the HCAs Review given the newly created permissibility of dual occupancies under the SEPP. The HCAs Review will consider HCA boundaries and investigate appropriate controls for HCAs that would sensitively accommodate dual occupancies without compromising heritage values. The HCAs Review has therefore been moved to Year 1 (2024/25) of the comprehensive heritage review, and the Thematic History Study has been moved to Year 2 (2025/26) to make way for the HCAs Review. These changes have been reflected in the Work Program at Table 1 accordingly.
14. A further phase of the NSW Government's housing reforms may result in other forms of low and mid-rise housing (townhouses, villas and apartments and the like) being permitted in Council's HCAs, where currently they are prohibited. Any announcements about these further reforms will also be considered when the analysis of the HCAs is undertaken.

DELIVERY PROGRAM AND OPERATIONAL PLAN (DPOP)

15. The “*Heritage Review*” has already been included as a Key Project in Council’s endorsed Delivery Program 2022-26 and Operational Plan & Budget 2024/25 (DPOP) (refer to Part 4, Section 4.5, ‘City Strategic Planning’). The project description in DPOP is to, “*Undertake year one of the five year heritage review program*”, with a target date of 30 June 2025. Further, an amount of \$150,000 has also been allocated to “heritage studies” in Council’s endorsed FY2024/25 Budget.
16. It is noted that the Work Program for the comprehensive heritage review, as articulated in Table 1, is a six-year program. However, of this, only the first five years of the program would have budget implications, with the final year involving implementation of associated LEP and DCP changes, which could be undertaken in-house using existing staff resources.
17. A Council resolution is now required to endorse the work program for the comprehensive heritage review, so that Council officers can action this key project accordingly, as per the endorsed DPOP.

CONSULTATION & TIMING

Stakeholder Consultation

18. Table 2 below details the stakeholder consultation that has been undertaken in relation to preparing the scope for the comprehensive heritage review.

Table 2 – Stakeholder consultation undertaken to inform the scope of the review

Date	Stakeholder	Stakeholder Comment	Council Officer Response	Responsibility
7 November 2023	Heritage Advisory Committee	<ul style="list-style-type: none"> Strong support for review. Provide for listings of First Nations cultural heritage sites. Seek State and Federal government funding for review. Need to increase heritage funding and resources and improve heritage management within Council. 	<ul style="list-style-type: none"> Support noted. Issue of listing First Nations sites included in scope of review. Enquiries have been made as to the availability of State and Federal government funding. The Integrated Heritage Strategy will address heritage funding, resourcing and management. 	A/Group Manager City Strategic Planning
8 February 2024	Heritage Advisory Committee	<ul style="list-style-type: none"> Request for consultation with Museums of History NSW and Greater Sydney Parklands. 	<ul style="list-style-type: none"> Consultation undertaken with these agencies. 	A/Group Manager City Strategic Planning
26 March 2024	Heritage Advisory Committee	<ul style="list-style-type: none"> Generally supportive of the draft project scope but queried whether the six-year 	<ul style="list-style-type: none"> Shortening timeframe would require increased budget allocation for staff resources, 	A/Group Manager City Strategic Planning

		timeframe could be shortened.	beyond that proposed.	
13 February 2024	First Nations Advisory Committee	<ul style="list-style-type: none"> • Supportive of an Aboriginal Heritage Study and Comprehensive Heritage Review. • Need to consult with traditional owners first before other stakeholders. 	<ul style="list-style-type: none"> • Support for review noted. • Need to consult with traditional owners included in scope of review. 	A/Group Manager City Strategic Planning
20 December 2023	Heritage NSW	<ul style="list-style-type: none"> • Aboriginal heritage, archaeology, natural environments, open spaces, and Parramatta's migrant communities are all important matters to be considered in the review. • Council should consider applying for NSW Heritage Grants funding when available. 	<ul style="list-style-type: none"> • Matters identified are included in scope of review. • Council officers will continue to monitor when grant applications may open. 	A/Group Manager City Strategic Planning
10 January 2024	National Trust (NSW)	<ul style="list-style-type: none"> • Should focus on Aboriginal heritage study, tighter heritage controls and HCAs. • Landscape values and need for better connectivity to key heritage sites also important. 	<ul style="list-style-type: none"> • Matters included in scope and/or noted. 	A/Group Manager City Strategic Planning
13 March 2024	Sydney Olympic Park Authority (SOPA)	<ul style="list-style-type: none"> • The SOPA area should be excluded from review, as SOPA has recently completed its own heritage review and the SOPA area is outside of Council's planning jurisdiction. • However, Council's thematic history study could reference themes from the SOPA area. 	<ul style="list-style-type: none"> • Matters reflected in scope of review. 	A/Group Manager City Strategic Planning
19 March 2024	Museums of History NSW	<ul style="list-style-type: none"> • Difficult to navigate heritage information on Council's website. • Important issues include: Aboriginal history; integration with European history; migrant communities; and adaptive reuse of heritage buildings. • Concern at development impacts on Elizabeth Farm. 	<ul style="list-style-type: none"> • Council's website being separately dealt with in the Heritage Communication Strategy. • Other matters raised generally included in scope and/or noted. 	A/Group Manager City Strategic Planning

14 May 2024	Greater Sydney Parklands	<ul style="list-style-type: none"> Heritage inventory for Parramatta Park needs to be updated to reflect heritage values. 	<ul style="list-style-type: none"> Information noted. 	A/Group Manager City Strategic Planning
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Councillor Consultation

19. Table 3 below details the Councillor consultation that has been undertaken in relation to this matter.

Table 3 – Councillor consultation undertaken to inform the scope of the review

Date	Councillor	Councillor Comment	Council Officer Response	Responsibility
15 November 2023	Councillor workshop	<ul style="list-style-type: none"> Legislative amendments needed to ensure adequate maintenance of local heritage items. Need to learn from Willow Grove. Should identify local heritage items that could be advocated for State heritage listing. 	<ul style="list-style-type: none"> Issues raised incorporated in submission on proposed Draft NSW Heritage Strategy. Project scope includes items to be advocated for State heritage listing. 	A/Group Manager City Strategic Planning
19 February 2024	Councillor workshop	<ul style="list-style-type: none"> Council officers to include \$150,000 in draft 2024/25 budget for “Heritage Studies”. Heritage Advisory Committee feedback to be sought on the ‘best practice review scenario’ for the review. A report on the Review be submitted to Council mid-year, once there is certainty on around the NSW Government’s proposed housing reforms. 	<ul style="list-style-type: none"> Funds included in budget, feedback sought from Heritage Advisory Committee and this report submitted in line with Councillor direction. 	A/Group Manager City Strategic Planning

Timing

20. The review is anticipated to take six years to complete, commencing in 2024/25 (Year 1) and ending in 2029/30 (Year 6). For more information regarding the timing of certain elements of the review, refer to the work program at Table 1. It should be noted that expediting the review to occur in a shorter timeframe would require additional funding for more staff resources to undertake the review.

LEGAL IMPLICATIONS FOR COUNCIL

21. There are no legal implications for Council associated with this report.

FINANCIAL IMPLICATIONS FOR COUNCIL

22. Table 1 of this report shows the proposed work program for undertaking the review over a period of six years from 2024/25 (Year 1) to 2029/30 (Year 6). Table 1 also indicates that there will only be expenditure on undertaking the various tasks of the review in the first five years, commencing in 2024/25 (Year 1) through to 2028/29 (Year 5). Table 1 also indicates that the estimated total cost of the review over these five years is **\$870,000**.
23. Table 4 below provides a break-down of the budget required for the project year-by-year. Council's approved budget for FY2024/25 already includes an amount of \$150,000 for "heritage studies". This budgeted amount will cover the costs for Year 1 (2024/25) of the review and therefore there are no further immediate impacts on the budget at this time. This report is not seeking approval for budget beyond 2024/25. For future years, Council will need to allocate budget accordingly to ensure the continuation of the review. Decisions regarding ongoing funding for the review post 2024/25 will be subject to future separate decisions of Council in preparing future budgets.

Table 4 – Detailed estimated project expenditure year-by-year

	FY 24/25	FY 25/26	FY 26/27	FY 27/28	FY 28/29
Operating Result					
External Costs	\$150,000	\$412,500	\$65,000	\$12,500	\$230,000
Internal Costs					
Depreciation					
Other					
Total Operating Result	\$150,000 budgeted	\$412,500 unbudgeted	\$65,000 unbudgeted	\$12,500 unbudgeted	\$230,000 unbudgeted
Funding Source	General Revenue	General Revenue	General Revenue	General Revenue	General Revenue
CAPEX					
CAPEX					
External					
Internal					
Other					
Total CAPEX	Nil	Nil	Nil	Nil	Nil
Funding Source	N/A	N/A	N/A	N/A	N/A

24. It is noted that the most significant year for project expenditure will be in FY2025/26 (Year 2) at an estimated \$412,500 (representing 47% of the overall estimated project cost). It is anticipated that the project will be funded through general revenue, although there may be opportunities throughout the life of the project for Council to apply for funding through the NSW Heritage Grants Program administered by Heritage NSW.
25. Having a supporting Council resolution to undertake the comprehensive heritage review will greatly assist Council officers when preparing future grant applications.

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ATTACHMENTS:

- | | | |
|---|---|------------|
| 1 | Summary of area and special subject heritage reviews for City of Parramatta LGA | 2
Pages |
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REFERENCE MATERIAL

ATTACHMENT 1

SUMMARY OF AREA AND SPECIAL SUBJECT HERITAGE REVIEWS FOR CITY OF PARRAMATTA LGA

1. In February 2000, Gordon Mackay Logan completed the *Parramatta Historical Archaeological Landscape Management Study* (PHALMS) that includes a survey of the archaeological remains within the Parramatta CBD and adjoining suburbs and a framework for their future management.
2. In November 2003, Mary Dallas Consulting Archaeologists completed the Parramatta City Council Aboriginal Cultural Heritage Study that was undertaken to ensure ongoing protection and management of Aboriginal heritage places.
3. In 2005, heritage consultant Graham Hall was engaged to assess properties throughout the (former) Parramatta LGA which had been identified for potential listing over a period of several years. At a meeting on 25 September 2006, Council resolved to accept recommendations as draft listings and incorporate them into future local environmental plans.
4. In December 2006, heritage consultant Rod Howard was engaged to undertake a study of Toongabbie and Epping to assess the need for new heritage items and to establish whether there was a need for the extension of conservation areas in Epping. Recommendations from the study were accepted by Council at a meeting on 23 July 2007 as listings in *draft Parramatta LEP 2008* at that time.
5. In January 2008, Council engaged heritage specialists from the NSW Government Architect's Office to carry out an independent review of the studies and draft listings of Rod Howard and Graham Hall. Following the independent expert review, Council agreed on 28 July 2008 to proceed with draft proposals to add a number of properties in Epping and elsewhere in the (former) Parramatta LGA to the heritage list and for the proposed creation and extension of conservation areas in Epping.
6. In 2012, consultants Planisphere completed preparation of the technical report, *'Development In Parramatta City and the Impact on Old Government House and Domain's World and National Heritage Listed Values'*. The report identifies views and settings important to the World and National Heritage Listed Values of Old Government House and Domain. In particular, it mapped areas of sensitivity where development risks having a significant impact and also suggested future guidelines to assist in mitigating development impacts. Council was one of the contributors to this report, with the other contributors being the Commonwealth Department of Sustainability, Environment, Water, Population and Communities; NSW Department of Planning and Infrastructure; and the NSW Heritage Office.
7. In August 2014, Mary Dallas Consulting Archaeologists completed the *Parramatta Aboriginal Cultural Heritage Study Review* of Aboriginal heritage management procedures and the information and mapping on which these are

based. Council at its meeting of 14 November 2016 resolved to exhibit proposed amendments to the *Parramatta DCP 2011* in relation to Aboriginal heritage management along with the *Parramatta Aboriginal Cultural Heritage Study Review*. Following the exhibition and consultation process with First Nations groups, these amendments to the *Parramatta DCP 2011* were adopted by Council on 24 September 2018.

8. Between 2014 – 2016 a review of the South Parramatta Heritage Conservation Area (HCA) and adjoining areas (generally land between the HCA and Boundary Street) was carried out by Council staff and Council's heritage consultant. Council on 28 May 2018, resolved to adopt amendments to *Parramatta Local Environmental Plan 2011* and *Parramatta Development Control Plan 2011* that in particular provided for a reduction in the extent of that HCA.
9. In June 2017, City Plan Heritage consultants completed a heritage review of Epping Town Centre (East). The heritage review made recommendations regarding conservation area boundaries, heritage listings and planning controls, and also provided a contribution ranking of properties within conservation areas.
10. In June 2023, City Plan Heritage consultants completed a draft heritage review of the Granville study area (generally land north of railway line) in response to the State Government's *Parramatta Road Corridor Urban Transformation Strategy* (PRCUTS) 2016. The review resulted in the investigation of 43 existing heritage items and the review of the Tottenham Street HCA. The review also identified a small number of potential items and one potential HCA requiring further consideration.
11. Between 2015 and 2019, a number of heritage studies were undertaken by Council as a part of the review of the Parramatta CBD planning framework and the preparation of the *Parramatta CBD Planning Proposal*. These heritage studies included the following:
 - In 2015, a heritage study of Parramatta CBD planning controls was undertaken by consultants, Urbis.
 - In 2017, a heritage study of interface areas relating to the Parramatta CBD was undertaken by consultants, Hector Abrahams Architects.
 - In 2019, a heritage analysis of the Church Street Precinct was undertaken by consultants, City Plan.
 - In 2019, a heritage review of Parramatta CBD Opportunity Sites was undertaken by consultants, Lucas, Stapleton, Johnson and Partners.