

24 February 2025

Kiersten Fishburn  
Secretary  
Department of Planning, Housing and Infrastructure

Locked Bag 5022  
Parramatta NSW 2124

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Dear Ms Fishburn,

**Parramatta North Precinct state-led rezoning proposal**

The National Trust of Australia (NSW) welcomes the opportunity to provide feedback regarding the Parramatta North Precinct state-led rezoning proposal.

This precinct is of outstanding significance and interest to the National Trust, who care for the neighbouring UNESCO World Heritage listed Old Government House in Parramatta Park. We also note that the entire complex planned for rezoning is located inside the State Heritage Register listed *Cumberland District Hospital Group, Parramatta Correctional Centre* and *Norma Parker Correctional Centre* sites. The National Trust also references the proposed World Heritage Nomination for the immediately adjacent Parramatta Female Factory site, led by the NSW Government.

The Trust is keen to see an active and exciting future for this precinct, which is effectively the northern extension of Parramatta Park. We are greatly concerned however that certain elements of the proposal will sever the connection between the two sides of the river, and completely jeopardise the World Heritage listing proposal for the Parramatta Female factory and Institutions Precinct.

Just as forward thinking by previous governments many years ago preserved Sydney's Domain, Botanic Gardens and Centennial and Moore Parks as the green hearts of a thriving future city, the National Trust calls on the current NSW Government to view the former Cumberland District Hospital site (in particular the section on the eastern side of the river) in the same way – as a unique public area that can provide the necessary green space for the future population of a growing Parramatta.

The Trust has made numerous submissions over many years for the various proposals for this site. We remain willing to continue to provide any advice regarding the future of this important place.

Yours Sincerely



David Burdon  
Conservation Director



The National Trust notes the following key concerns regarding the heritage conservation of both the Cumberland Hospital landscape and the wider historic community of North Parramatta:

**Key National Trust Key Concerns and Recommendations:**

- **The historic landscape significance of the site will be adversely affected.**  
The proposal will result in the loss of key connections, sightlines, buildings of heritage significance, publicly accessible areas, and the heritage parkland setting.
- **The building envelopes are oversized in the heritage context.**  
This proposal has a greater GFA than that originally proposed for Barangaroo. Developments of this scale will overwhelm the heritage qualities of the site, and result in the demolition of almost all contributory buildings of “moderate” significance.
- **Key heritage sites have not been permitted appropriate buffers.**  
We note the adversely large building envelopes directly adjacent to the Female Factory site as well as in the central heritage core of the Cumberland Hospital site. These will permanently remove any chance for the Parramatta Female Factory (“Cultural Precinct”) to obtain the World Heritage status that is simultaneously being sought by the NSW Government.
- **There is inappropriate analysis of visual impact.**  
Key views both inside the site and from adjacent heritage places have not been assessed. The Visual Impact Assessment must be revised to include accurate visual impact assessments of the existing and impacted historic views identified in the Conservation Management Plan.
- **The core of the site should not be encumbered with new buildings.**  
The proposed new buildings in Lots F3, F4 and F5 should not proceed as planned. The imaginative and adaptive re-use of the current heritage buildings at the core of the site would result in a much better historic and urban outcome at the heart of the site – as has recently happened in numerous redevelopments in Sydney.
- **Buildings can and should be adapted as part of any true heritage-led renewal.**  
Buildings C.61, C.64 and C.69 should be retained and repurposed for new uses. These buildings are key elements of the site. Building C.61 is directly attributed to Colonial Architect James Barnet and should never have been considered for demolition, while building C.64 is the key historic building fronting the central oval and the desired “civic” core of the site.
- **The riparian zone is critical to the success of this project**  
The significance of the Parramatta River at this site cannot be underestimated and should be properly preserved and rehabilitated.

We elaborate upon these concerns in the following pages.



### **Historic context**

The National Trust notes that the Parramatta area holds a wealth of heritage significance, for its Aboriginal cultural importance, history as the food basin of Colonial Australia, natural confluence of the river resulting in prominent landscape and ecological values, and for its long-standing history as Australia's second city and home to many early government and institutional sites. As noted by the City of Parramatta Council, Parramatta continues to remain a 'pioneering location for industry, agriculture and politics' in Australia.

We note that the City of Parramatta Local Government Area contains 1431 locally listed items and 71 on the State Heritage Register, making it one of the most significant heritage places in Sydney. Within very close proximity to the proposed rezoning site are dozens of further heritage items, many of which relate back to its historic landscape as an emerging farming precinct and governmental destination, including the World Heritage listed Old Government House.

We recognise that the subject site itself contains a wealth of heritage qualities and listings, including the juncture of the Parramatta River and Toongabbie Creek and as the location of the first government water mill. The whole complex contains one of the longest and varied histories of institutionalisation in the country, having contained the oldest Female Factory in Australia, first purpose-built institution for the care of Roman Catholic children, the longest operating children's reformatory and formerly the oldest operating gaol in NSW. It is thought that one in ten Australians have ancestral connections to the Parramatta Female Factory institution.

Many of the buildings, which date back to the 19<sup>th</sup> century, are associated with prominent Governors, Government Architects and families throughout colonial Australia. The continued evolution of buildings and landscapes throughout the precinct refers to evolving principles and practices of institutionalisation, reform and hospitalisation. The landscaped nature of the site demonstrates the spatial qualities promoted in mental health services of the time.

The Trust recognises that the landscape of Parramatta continues to evolve, with rapid changes occurring both within the inner-city skyline and further afield.

It is the hope of the National Trust that these changes and new developments can be balanced in a meaningful way alongside the existing cultural heritage qualities of the Parramatta region. We maintain that heritage is just as much about the future as it is about the past, and believe that this important site – described as "one of the richest heritage areas in New South Wales" and "a place of National Significance" – can play a valuable role as a green and accessible public space in the heart of a developing Parramatta.

As custodians of the UNESCO World Heritage listed Old Government House, inside Parramatta Park, as well as the State heritage listed (and Australian Heritage Register nominated) Experiment Farm Cottage, the National Trust continues to be interested in advocating for the consideration and conservation of this incredibly important place.

### **Heritage Landscape**

The entirety of the subject site is listed on the NSW State Heritage Register – the highest level of statutory listing in NSW that is intended to help preserve and protect the heritage values of a place for future generations.

The National Trust notes the Cumberland District Hospital Group statement of significance on the State Heritage Register (National Trust emphasis in bold):

***The Cumberland Hospital is a place of National Significance. It provides abundant physical evidence of the formative years of the Colony of New South Wales, and the initial settlement of Parramatta. It has been in continuous institutional use since 1818. What survives of the various buildings, relics and landscapes provides a valuable insight into changing attitudes to welfare, criminal behaviour and mental health, over a period of 175 years.***



*The layout of the complex and the existing relationships between buildings and spaces continues to convey the organising principles upon which the different institutional uses were administered and structured. **The spaces created have continuing landscape significance and aesthetic appeal.***

***The whole site enjoys an outstanding parkland setting beside the Parramatta River.** This reinforces the physical links and historical associations with neighbouring institutional and recreational facilities. These include Parramatta Gaol, Government House, the Norma Parker Centre and Parramatta Park. **All of these sites contain buildings listed by the National Trust and the Australian Heritage Commission, making this one of the richest heritage areas in New South Wales.***

*All buildings on the site have considerable historical interest, particularly those structures dating back to the initial use of the site as the Female Factory, established by Governor Macquarie. They all provided continuing reminders of the original role and function. Most buildings also have great architectural and aesthetic value.*

*The collection of buildings built for the Lunatic Asylum in the 1870s through to 1910, are outstanding examples of public architecture. Despite their functional simplicity they manifest handsome exteriors, framing the adjoining courtyards in a pleasant human scale. Building 1A, with its imposing clock tower, contributes a sense of dignity and formality.*

*The architecture of the precinct generally reflects Victorian, Georgian and Classical Revival notions of grandeur. Each of the buildings from the 1870-1901 period reflects the influence of Colonial and Government Architect's James Barnet and Walter Liberty Vernon, as well as FN Manning, the then Inspector-General for all lunatic asylums in New South Wales.*

*Internally the buildings were functional and rather austere. The spatial arrangements however clearly expressed the original uses and continue to evoke images of their historical role. The site is also considered to be a potentially rich source of archaeological material.*

*(NSW Department of Health Property and Heritage Register, 1992).*

The significance of the site is largely imbued in its spatial and aesthetic qualities that display the principles of government institutional sites throughout the history of Australia. This is especially evident in the period of the precinct as an insane asylum, from which it displays the common principles focusing on garden settings, outdoor recreation, sanitation, and connection to the water that are also reflected at the former sites of Callan Park Hospital for the Insane and Tarban Creek Lunatic Asylum (Gladesville Mental Hospital), located further down the Parramatta River.

The Cumberland Hospital site, in its current form, contains large open green spaces and a parklike setting between its low scale, scattered buildings. In an increasingly and accelerating developed area of Sydney, the park-like setting of the Cumberland Hospital site has been largely retained, and in contemporary times provides an important low-density green public space.

The arrangement of the existing buildings in the space is purposeful, with each relating to each other, the environment, and the river, with a focus on access to air and the natural environment.

The National Trust is concerned that the current rezoning proposal will compromise this landscape. We note that the proposed buildings heights and envelopes will dominate the retained heritage buildings, severing views, connections, access to light, access to the sky, and result in a reduction of outdoor space. The arrangement of the zones for new development appears to be random, with little response to the surrounding greenery, previous heritage planning or to each other.





### Visual Impact Analysis

The National Trust consider that the Visual Impact Analysis prepared by Urbis for this proposal is completely inadequate to illustrate the impact of this proposal upon the established heritage values of the site.

We feel the document does not adequately address the impacts upon important views both internally and at nearby heritage places. We consider that nine views are not enough to consider a 14 hectare site, and note that not a single view is actually from within the former Cumberland District Hospital site.

Page 52 of the UDF outlines the “key heritage views as per advice from heritage consultant”. As is outlined in the Conservation Management Plan for the site, and illustrated on page 53 of the UDF (illustrated below) for this proposal, there are numerous identified views within the Parramatta North Historic Site that have not been analysed.

These include numerous views from:

- Within the Female Factory and Institutions Precinct;
- Within the walled courtyards of the Parramatta Gaol;
- Along both banks of the Parramatta River;
- Various locations within the central “Green” area.



An aerial view of the Parramatta North Historic Sites identifying the existing and impacted historic views from the PNHS to the surrounding areas.

Source: PNHS CCMP 2020 by TKD Architects, 2017.



An aerial view of the Parramatta North Historic Sites identifying the existing and impacted historic views within the PNHS.

Source: PNHS CCMP 2020 by TKD Architects, 2017.

**National Trust Recommendation:** The Visual Impact Assessment must be revised to include accurate visual impact assessments of the existing and impacted historic views identified in the Conservation Management Plan. In particular, the impact on the Parramatta Female Factory and Institutions Precinct, the Gaol and the central “Green” must be assessed, including internal (courtyard) views from those spaces.





*Some of the proposed views show the impact of the proposal obscured by scaffolding*



*Other views show a “tree to be removed” still in location, and providing a useful screening to the proposed development.*



The Trust makes the following notes in relation to the Visual Impact Assessment:

#### General

- The use of blue and transparent shading against the sky does not adequately represent how a building will sit in the landscape.
- The use of view lines deliberately obscured by trees or buildings does not provide a holistic understanding of impacts to views.
- Views need to consider the impact of restored views along the riverbanks (ie: after invasive species have been removed and bushland management activities have been undertaken) and not rely on overgrown elements to obscure proposed works.
- The number of views assessed is not sufficient
- The choice of view locations assessed is deliberately misleading

#### Site specific

- The photomontages do not contain appropriate view considerations inside the Cumberland Hospital site, noting that all angles are from the borders of the site rather than any inside the State Heritage listed precinct (VPI, VPH).
- The photomontages do not contain adequate view assessments from within the Female Factory/Cultural Precinct, with only one view analysed (VPG) at an obscured angle. It does not address views from zones directly adjacent to development, from open spaces, or how the Cultural Precinct is understood in the wider context with a backdrop of high-rise buildings. These changing perspectives may affect the site's World heritage nomination.
- The photomontages do not contain any view assessments from within the Parramatta Gaol site. The omission of this assessment is not an appropriate outcome.
- The photomontages do not adequately assess views from the World heritage listed Parramatta Park. Only one image has been assessed from the park (VPB) and has been angled to avoid the high-rise developments at either end.



*Historic views along the riverbanks were of a much more open nature than those currently encountered in the precinct which have been overgrown after many years of neglect.*

(Source: E. W. Searle. (1935) *Mental Asylum, Parramatta, New South Wales*, <http://nla.gov.au/nla.obj-141918603>)





### **Conservation Policies**

We note that the rezoning proposal does not, in the opinion of the National Trust, align with the following Conservation Management Plan policies:

<b>Policy no.</b>	<b>Statement</b>	<b>Notes</b>
7.1	<b>Proposed works within the PNHS will be assessed for their potential to impact the heritage significance of the place and/or other heritage items and heritage conservation areas in the vicinity.</b>	The National Trust does not believe that the impact of the proposed rezoning project has been adequately assessed, noting that both the character of the heritage site and its surroundings will be irreversibly changed.
13.1	<b>The significant cultural landscapes of the PNHS and their components will be retained, conserved, enhanced and interpreted consistent with their assessed heritage values</b>  <b>[Retain, conserve, enhance and interpret all significant cultural landscape components including landforms and spaces; layouts of plantings, gardens and paths; building curtilages and settings; cultural plantings; retaining/garden walls and edges; the weir; fountains; ponds and other ornamental elements; and roadways and paths.]</b>	The National Trust notes that many of the contributory and 'moderately' assessed buildings will be demolished as part of the rezoning project. Significant open space and the park-like setting will also be lost.
14.1	<b>Proposals within the PNHS will retain, conserve and enhance significant historical relationships, building curtilages and settings, views and vistas.</b>  <b>[Retain, conserve and interpret significant historical, functional and visual relationships between buildings and structures and with their immediate and wider settings.]</b>	The National Trust notes that the spatial planning arrangements of the hospital site will be lost to the new development. A number of views between historic sites, as well as to the river, and access to sky views will not remain.
20.1	<b>The Conservation of buildings and structures will be consistent with their assessed levels of heritage significance and in accordance with the guidelines included in the PNHS CMP.</b>  <b>[Buildings and structures of Moderate heritage significance should be retained and adapted to appropriate new uses]</b>	The National Trust notes the proposed demolition of almost all buildings assessed as having 'moderate' significance, despite the CMP recommending their retention.
32.1	<b>Significant built components of the PNHS are to be cleaned, maintained and repaired to avoid deterioration consistent with their heritage values and the legislative requirements.</b>	The time period for the care and maintenance of historic structures as part of the development has not been specified. The Trust would recommend that heritage conservation works must precede any other redevelopment on the site (as has recently happened at the government-led White Bay Power Station site)
40.1	<b>The adaptive re-use of significant buildings and structures and open space areas within the PNHS is encouraged...</b>	The National Trust notes the missed opportunity to adaptively re-use rather than demolish a number of structures.





41.1	<b>Upgrading of the open space areas within the PNHS should retain, conserve and enhance the significance aspects of their cultural landscapes including layouts, historical and visual relationships, building curtilages and settings, views and vistas, cultural plantings and other significant built and landscape components.</b>	The National Trust notes the loss of/privatisation of a number of open and landscaped areas, as well as the loss of visual and physical connections throughout the precinct.
49.1	<b>Alterations and additions to significant buildings and structures will need to be designed to avoid or minimise adverse impacts on their heritage significance or on other significant components of the Public Domain or wider PNHS.</b>	The National Trust notes the rezoning will seek to the demolition, rather than alteration and adaptive re-use, of a number of buildings that will adversely affect the landscape of the public domain.
50.1	<b>Demolition of buildings and structures and/or parts of buildings and structures within the PNHS will be consistent with the assessed heritage significance of the building/structure or parts of a building/structure.</b> <b>[Buildings and structures of moderate heritage significance should be retained and adapted to appropriate new uses]</b> <b>[Proposals for demolitions...will need to demonstrate that:</b> <ul style="list-style-type: none"><li>• Demolition would result in no or minimal impacts on the heritage significance</li><li>• Demolition would be of overall benefit to the heritage significance of the place</li><li>• There is no prudent or feasible alternative]</li></ul>	The National Trust notes the likely demolition of almost all buildings assessed as having 'moderate' significance.
51.1	<b>New buildings within the PNHS will be consistent with established principles and the guidelines provided in the PNHS CMP.</b>	The National Trust notes that the proposed building envelopes would allow for developments which are not consistent with the CMP guidelines.



### **Comments on Urban Design Framework**

The Urban Design Framework (UDF) is, to our understanding, the overarching document which summarises the intent of this application. While there are numerous statements and principles within the document that the National Trust could support, in many instances these very same objectives are contradicted by the proposed built outcomes proposed as part of this rezoning.

### **Integration of Parramatta Park Plan of Management July 2020 Key Principles in the Urban Design Framework**

The National Trust notes (page 8 of the UDF) that the proposed Structure Plan for this rezoning “addresses the objectives as outlined in the Plan of Management”. The Trust supports this aim and the ambition to align with the highly relevant Parramatta Park Plan of Management 2020 (POM) which is an excellent document.

We are however concerned with the following omissions from the UDF:

- The UDF has changed the wording of Strategy 1.2 from the POM from *“Care for the heritage fabric and landscape qualities of the Park”* to *“Plan and manage new works without adverse impact on the significant landscape qualities and heritage fabric of the park.”* This change instead focusses on one of the actions concerned only with new works, and changing it to a strategy which is concerned with the overall care of the heritage values of the place. The Trust believe the original strategy should be maintained. We note the other actions under this strategy:
  - *Conserve and interpret evidence of Aboriginal occupation in the Park in collaboration with Aboriginal groups.*
  - *Conserve, manage and interpret the built fabric and landscape features of the Park in accordance with the Burra Charter with the guidance and assistance of cultural heritage experts.*
  - *Plan and manage new works to consider all periods of the Park’s use and associated heritage values.*
- The UDF has chosen not to include Strategy 4.1 *“Sustainably manage Park assets and operations while protecting cultural heritage values”* or Strategy 4.3 *“Continue to monitor the natural and cultural heritage values of the Park”*. The Trust would argue that all of the strategies in the POM are relevant to this application, and would encourage the reinstatement and consequent influence of these omitted strategies in the UDF. We note the following POM actions associated with these strategies that we feel are particularly relevant:
  - *Review the Park’s heritage asset management systems and develop and implement a heritage asset maintenance and conservation program.*
  - *Develop a Park-wide Design Manual to guide future capital works and achieve design excellence appropriate to the Park’s heritage fabric and landscape character*
  - *Continue to implement heritage values monitoring programs.*

**National Trust Recommendation:** The Urban Design Framework should be updated to accurately include all of the key objectives from the Parramatta Park Plan of Management, including those that relate to the heritage fabric and heritage values.

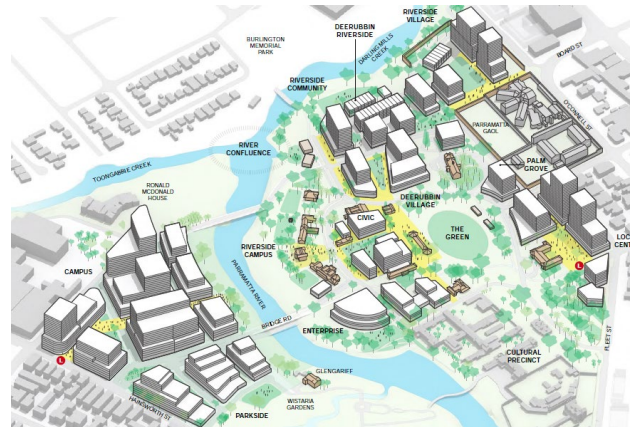


## Yield Summary

There is no question that this rezoning proposal is of an enormous scale – all within the boundaries of state heritage listed land – and that this will have an effect on the values of this heritage listing.

In order to appreciate the scale of this proposal, the National Trust has chosen to compare it with Barangaroo. Incredibly, despite the site being 8 hectares smaller, this proposal for Parramatta North is actually bigger than the original proposal for Barangaroo in the Sydney CBD.

	Lot Area (m <sup>2</sup> )	GFA (m <sup>2</sup> )
<b>Barangaroo (2005 initial scheme)</b>	220,000	389,511
<b>Barangaroo (2015 revision)</b>	220,000	681,008
<b>Parramatta North</b>	140,969	463,403



*The original concept for Barangaroo (left) involved a target GFA of 300,000m<sup>2</sup> on the 22 hectare site in the Sydney CBD. The current proposal for Parramatta North includes a GFA of over 450,000m<sup>2</sup> on a 14 hectare site.*

The height of some of the proposed towers, particularly along the north-eastern (O’Connell and New Street) boundaries will have a major impact upon the heritage values of the Cumberland District Hospital and its riverside setting, and also the historic former Parramatta Gaol – when just 160m away are the small scale low-rise warehouses and carparks of Church Street north that will surely be redeveloped into the future.

The National Trust is also concerned about the amount of “Public space on development lots” which is 15.1% of the developable site area (UDF, p.66). It is unclear how this space could be considered “public” when it is listed separately to “Public Open Space Zoned RE1 (Useable Open Space)” which occupies 18.6% of the developable site area.

Under this scenario all of Lot F1 and F2 will, we understand, be privately controlled public space. As the Government Architect NSW *Draft Greener Places Design Guide* (pp.16-19) notes, the quality of design and ongoing maintenance and management is critical to attracting use and activating the open space network. Other recent developments across Sydney have shown the issues that can occur with separate entities controlling and managing what is generally understood to be public space.

### National Trust Recommendation:

The current GFA for the proposal must be considered excessive, and actually exceeds the original proposal for Barangaroo. There is scope to reduce this without affecting the future success of the site.

Public space should be public, not private.





### **Built Form and Massing**

The built form and massing of the rezoning proposal is one of its most important elements in terms of impact on the state heritage register listed qualities of the site. The National Trust holds particular concerns for the spaces that have been denoted as Lot F3, Lot F4 and Lot F5 and recommend these areas be reconsidered in particular.

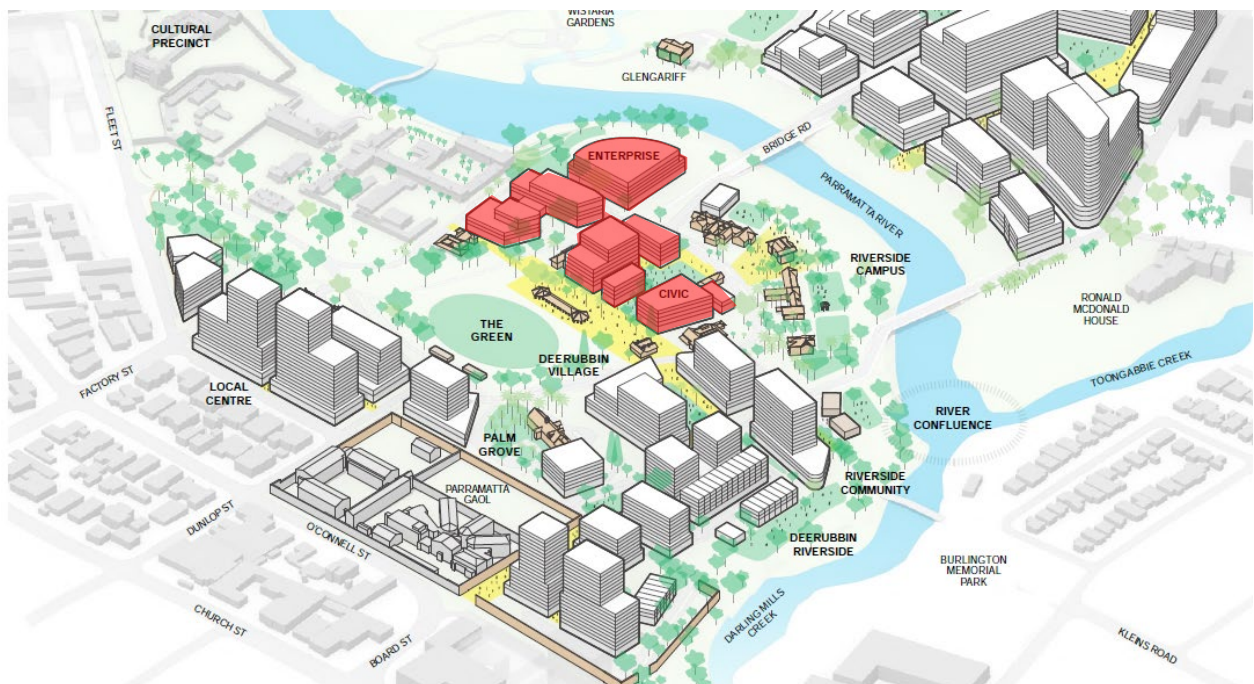
The National Trust agrees with the NSW Government Architect (State Design Review Panel November 2023) that:

- *The height and building mass of buildings in lots F3, F4 and F5 within the Civic Zone are considered inappropriate for their location.*
- *Building F5 currently impedes opportunities for clear access and connection from the northern end of the site through the central green space towards Parramatta Park*

We also agree with the Heritage Council of NSW (Meeting 535, February 2025)

- *The buffer zone for the Parramatta Female Factory and Institutions Precinct World Heritage nomination is likely to include Lots F4, F5 and G2 of the rezoning proposal.*
- *There will be adverse impacts to its setting and views from within the Parramatta Female Factory and Institutions Precinct, particularly relating to buildings in Lots F4, F5 and G2.*
- *The Proposed Height of Building for Lots F4, F5 and G2 should be reduced*
- *The proposed indicative footprint and proposed height of the building on Lot F4 do not respond to the exceptionally fine-grained and low-scale urban layout of the significant heritage buildings and landscapes in the Parramatta Female Factory and Institutions Precinct and the Cumberland District Hospital Group.*

The National Trust considers the central part of the precinct the most important in terms of the heritage values of the site. These spaces (F3, F4 and F5) allow the unique qualities of Lots F1, F2, the Green and the River to connect with the Cultural Precinct, Parramatta Park, the Palm Grove and Parramatta Gaol. It is vital that these spaces are allowed to remain as the key linking part of the site.



*Built Form and Massing diagram, with buildings that will have an unacceptable level of heritage impact highlighted in red. (Source: Parramatta North UDF, p.74 with National Trust overlay)*



The inclusion of new buildings of such scale in these areas in particular will have a permanent negative effect upon the NSW State Heritage Register listed values of the Cumberland District Hospital site, including the World Heritage list nominated Female Factory site.

The State Heritage Register Statement of Significance for the site (SHR#00820) is very clear on what components contribute to the values of the place (National Trust emphasis in bold):

*The Cumberland Hospital is a place of National Significance. It provides abundant physical evidence of the formative years of the Colony of New South Wales, and the initial settlement of Parramatta. It has been in continuous institutional use since 1818. What survives of the various buildings, relics and landscapes provides a valuable insight into changing attitudes to welfare, criminal behavior and mental health, over a period of 175 years.*

***The layout of the complex and the existing relationships between buildings and spaces continues to convey the organising principles upon which the different institutional uses were administered and structured. The spaces created have continuing landscape significance and aesthetic appeal.***

*The whole site enjoys an outstanding parkland setting beside the Parramatta River. This reinforces the physical links and historical associations with neighbouring institutional and recreational facilities. These include Parramatta Gaol, Government House, the Norma Parker Centre and Parramatta Park. All of these sites contain buildings listed by the National Trust and the Australian Heritage Commission, making this one of the richest heritage areas in New South Wales.*

There are numerous recent examples of outstanding new developments, both locally and internationally, where heritage buildings (of varying levels of significance) have been retained and adapted at the heart of new precinct wide developments.

The National Trust is calling for the proposal for Parramatta North to be redesigned to ensure heritage and landscape is at the core of the development. We would urge the innovative adaptive re-use of the buildings already on the site – supplemented where necessary by new buildings of a similar scale – to retain and enhance the heritage values of this core part of the precinct.

The National Trust is firmly of the opinion that the desired “civic” and “enterprise” uses for these spaces can be achieved within the existing spaces.

We note the “Design Objectives” and “Country Centred Objectives” (UDF, p.94) for the Civic Zone and do not believe that the current proposal responds to any of the following:

Country Centred Objective	National Trust comment
<i>Respond to the open and expansive sweep of the river</i>	The proposed buildings (in particular Lot F4) in fact block key views to the precinct to and from the river.
<i>Create a community hub connected to and addressing the river</i>	Lot E is noted as a “Riverside Community” area for this purpose. Lot F4 is shown as an “enterprise” and would not support this purpose.
<i>Create clear and inviting connections to the river</i>	The buildings in Lot F3, F4 and F5 interrupt the key connection point to the river for the majority of the precinct.
<i>Provide a meeting place which connects the Green to the river</i>	The buildings in Lot F3, F4 and F5 in particular sever the important connection between the Green and



	the river. They will block all views of the riverside trees from the Green.
<i>Create a centre of campus life - potential university hub</i>	The designated “civic” area as planned in fact fractures the site – disconnecting the potential “Riverside Campus” from the “Cultural Precinct” and “The Green”
<i>Revitalise the Cumberland Hospital heritage buildings within a native parkland setting</i>	Only buildings designated of high significance are preserved. The Trust has outlined in this response in particular the opportunity to revitalize buildings C.61, C.62 and C.69 which are important contributors to the parkland setting.
<i>Focus development around public transport connections</i>	The Light Rail stops are at the edges of the site, not the centre. Development should be focused around these spaces.
<i>Provide a sensitive interface to the Cultural Precinct</i>	This submission outlines in detail the numerous objections to the interface of Lots F4 and F5 in particular to the Cultural Precinct. These proposed buildings, along with those proposed in Lot F3, will have a highly damaging interface with the Cultural Precinct and, in the opinion of the National Trust, will completely destroy any chance of this precinct obtaining World Heritage listing status.

#### **National Trust Recommendation:**

The areas of the site denoted as F3, F4 and F5 are of utmost importance to the heritage values of Parramatta North. The proposed new building envelopes in these zones will have a permanent negative effect upon the historic layout and complex and existing relationships between the buildings and spaces of the site.

The retention of buildings of “high” and “exceptional” significance in these spaces is not sufficient to maintain the heritage values of the site – indeed, the retention of significant buildings and then overshadowing them with inappropriate new development will instead reduce their significance. The Trust reinforces the state heritage register listing which notes that *“the spaces created (between buildings) have continuing landscape significance and aesthetic appeal.”*

The National Trust calls for:

- No new building at all on Lot F4, but rather the provision of open space with the important connection to the Parramatta River and Parramatta Park;
- Adaptive re-use of the existing buildings C.61, C.62 and C.69;
- New buildings within these zones to be of similar scale to the existing structures.

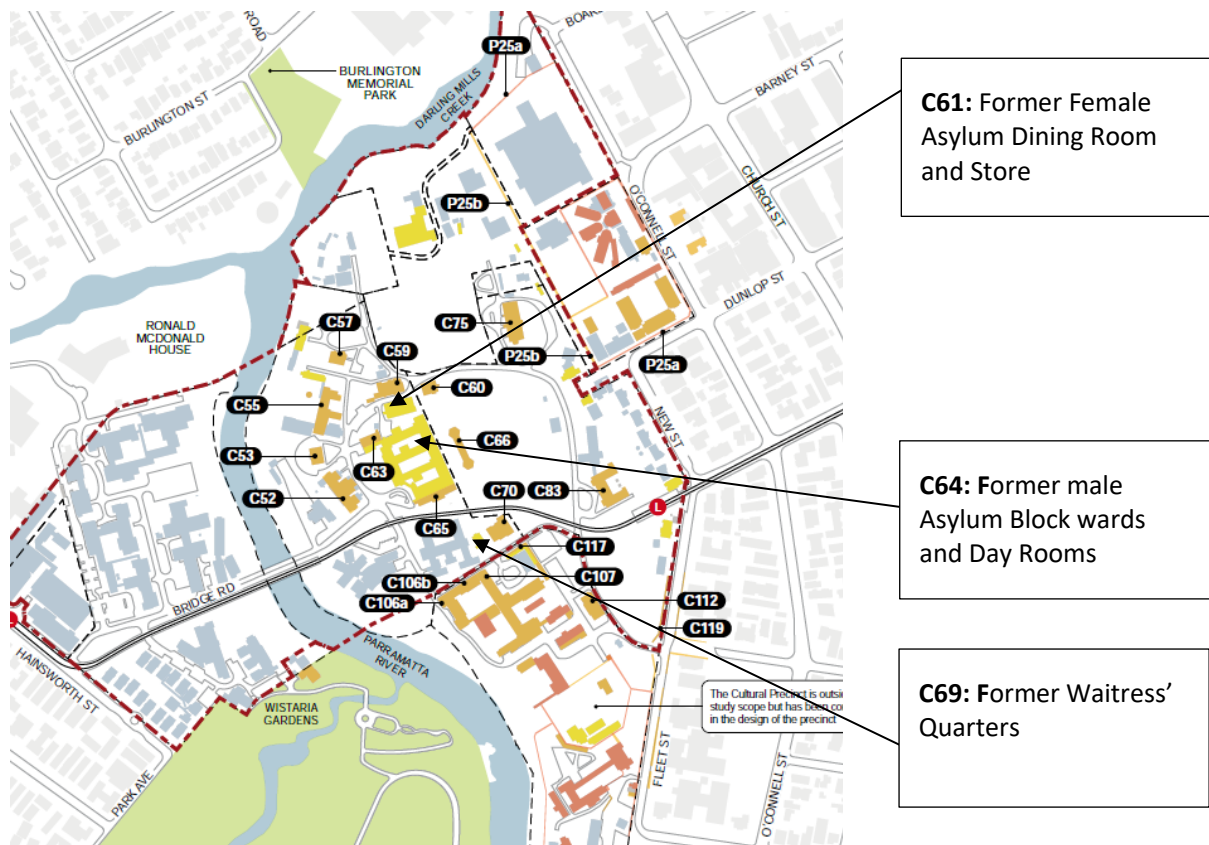




### Heritage items within the site

Pages 49-51 of the UDF outline the “heritage items” within the site. These items have been selected based on the significance assessment by Megan Jones Architect and the 2017 PNHS CMP by TKD Architects.

This rezoning application is based on the assumption that heritage items of “moderate significance” should be demolished and removed from the site, and only buildings of “high” or “exceptional” heritage significance are worthy of retention at the Parramatta North Historic Site. The National Trust do not agree with this position.



*Heritage Items within site that should be retained and adaptively re-used*

*(Source: UDF p.49, with National Trust overlay)*

The National Trust strongly urges for the retention and/or adaptive re-use of buildings C61, C64 and C69. These buildings are of heritage significance and make important contributions to the precinct.



Building recommended for demolition in this rezoning proposal	2017 CMP analysis and recommendations (direct quotes)	National Trust comment
 <p><b>C.61 WSAHS Interpreter Services (former Female Asylum Store/Male Asylum Dining Room and Day Room)</b></p>  <p>Figure C-22 from the 2017 CMP showing the important curtilage and functional relationships between buildings C59, C60, and C61.</p>	<ul style="list-style-type: none"> <li>• <i>Constructed c1880s to a design by the Colonial Architects Office overseen by James Barnet.</i></li> <li>• <i>The former Female Asylum stores were constructed as part of the Lunatic Asylum.</i></li> <li>• <i>The building is recorded to have been altered by W L Vernon in c1890s</i></li> <li>• <i>The building is of significance as residence associated with J Barnet, W L Vernon and the Government architects.</i></li> <li>• <i>The existing form and fabric provides historical evidence of craftsmanship and design. It is tangible evidence of the historical development of health care in the Cumberland Hospital site and within Australia.</i></li> <li>• <i>The building is currently in sound and good condition.</i></li> <li>• <i>The WSAHS Interpreter Services building makes a moderate contribution to the heritage significance of the Cumberland Hospital (East Campus) site and should be retained.</i></li> <li>• <i>The building can tolerate considerable change both internally and externally</i></li> </ul>	<p>It is inconceivable to the National Trust that an original building constructed a to design by the last NSW Colonial Architect James Barnet and with additions by the first NSW Government Architect Walter Liberty Vernon, within a state heritage listed precinct, could be recommended for demolition by the NSW Government.</p> <p>Along with Buildings C59 and C60 (both denoted to be retained and of high significance), Building C61 should be retained.</p> <p>The intrusive later modifications to this building can and should be easily removed, and its original form restored.</p> <p>The building makes an important contribution to the precinct and can easily be adapted for new uses.</p>



Building recommended for demolition in this rezoning proposal	2017 CMP analysis and recommendations (direct quotes)	National Trust comment
 <p><b>C.62 Area Cashiers (former Male Asylum Block)</b></p>  <p>Figure B-3 from the 2017 CMP showing the important relationship between the Male Asylum Shelter Shed (now known as the Cricket Pavilion) and the Male Asylum with its extensive verandah.</p>  <p>The extensive verandah fronts the oval and would be immediately suitable for other uses including dining.</p>	<ul style="list-style-type: none"> <li>• <i>The building was constructed in 1934-1935 as a replacement for the original timber-framed wards constructed in the late 19<sup>th</sup> century for the Male Asylum.</i></li> <li>• <i>The now building retains much of the original layout. A verandah infill and alterations to the openings are evident along the length of the north western verandah.</i></li> <li>• <i>Mature plantings located in the courtyards were also retained and some remain within the complex of the buildings today.</i></li> <li>• <i>The building is of significance as tangible evidence of the historical development of health care in Australia and the Cumberland Hospital</i></li> <li>• <i>The block has retained the original courtyards with mature plantings providing evidence of the layout of the complex in the nineteenth century.</i></li> <li>• <i>The building is in fair to good condition... and should be retained.</i></li> </ul>	<p>The Cricket Pavilion was originally constructed in the 1870s/1880s as a shelter shed for the 'temporary' Male Weatherboard Division, which was later bricked to become the Male Asylum (Building C.62).</p> <p>As the CMP notes: "<i>The former Male Shelter Shed was sited with a direct relationship with the Male Asylum complex and continues to exist as a prominent feature of the associated open area.</i>"</p> <p>The National Trust commends the recent works to preserve the Cricket Pavilion (C.66) but the importance of that building in the context of the Cumberland Hospital is directly related to building C.62, which provides the backdrop and all services related to the pavilion and the oval.</p> <p>The original historic plantings within the courtyards are also of heritage significance.</p> <p>This building and its extensive verandah (facing the oval) make a significant contribution to the site.</p> <p>The building can and should be retained and adapted for new purposes.</p>





Building recommended for demolition in this rezoning proposal	2017 CMP analysis and recommendations (direct quotes)	National Trust comment
 <p><b>C.69 Wattle Cottage (former Waitresses' Accommodation)</b></p>  <p>An older photo of the Wattle Cottage showing how the form has remained virtually unchanged.</p>  <p>The building is directly related to the adjacent Staff Dining Room (Phoenix Café). This view is taken directly from the World Heritage nominated Female Factory site.</p>	<ul style="list-style-type: none"> <li>• <i>Wattle Cottage was constructed c1910 as waitress' accommodation for the Staff Dining Room (C70) constructed at the same time</i></li> <li>• <i>Although the building has undergone a succession of modifications, the form, layout and fabric of the building is substantially intact.</i></li> <li>• <i>The design elements, in particular the decorative details of the original structure, are fine examples of their time/type. They provide information on early twentieth century craftsmanship and design.</i></li> <li>• <i>The building retains much of its original form and fabric</i></li> <li>• <i>The Wattle Cottage appears to be in fair and good condition.</i></li> <li>• <i>The building makes a moderate contribution to the heritage significance of the Cumberland Hospital (East Campus) site and should be retained.</i></li> </ul>	<p>The former Waitress' Accommodation building is directly related to the adjacent Staff Dining Room (C.70) which is earmarked to be retained.</p> <p>It is therefore likely that this building would also have emanated from the office of Government Architect Walter Liberty Vernon.</p> <p>To remove this building would be to remove a key element of the site and an ability to understand how it functioned historically.</p> <p>The building is directly visible from, and part of the curtilage of, the "Cultural Precinct" – otherwise known as the Female Factory and currently being put forward for consideration on the World Heritage List.</p> <p>It makes an important contribution to the heritage values of the Cumberland Hospital site, in particular as one of the buildings fronting the oval.</p> <p>The National Trust strongly believes that this building makes a unique architectural contribution to the site and should be retained and repurposed.</p>

**National Trust Recommendation:**

Some buildings of Moderate Heritage Significance can and should be maintained in the Cumberland District Hospital Group state heritage register listed precinct. They are contributory items to the heritage values of the place.

In terms of redevelopment opportunity, buildings of moderate significance in fact offer far greater opportunity for adaptive re-use as they can be modified and adapted to a greater extent.

It is inconceivable to the National Trust that an original building (C.61) constructed a to design by the last NSW Colonial Architect James Barnet and with additions by the first NSW Government Architect Walter Liberty Vernon, within a state heritage listed precinct, could be recommended for demolition by the NSW Government. It should be repaired and restored along with the adjacent buildings C.59 and C.60.

The National Trust firmly believes that Building C.62 is capable of significant adaptive re-use in a way that provides the intended “civic” functions associated with the proposed Lot F3 – especially given its direct relationship with the Cricket pavilion and oval. It should be retained and repurposed.

The National Trust also recommends the retention of Building C.69. This small but beautiful building makes a unique contribution to the site ad is directly related to the adjacent former Staff Dining Room. It is completely senseless to demolish this building and cause a severe negative impact to the curtilage of the World Heritage nominated Female Factory site. It should be retained and repurposed.



## Examples of heritage-led renewal



### Tramsheds Harold Park

This authentic, highly considered heritage restoration project, salvaging and reinterpreting the iconic Tramway Depot to create a unique food destination – housing providores who are passionate about food, sustainability and education. Brought back to life, the building is now a much-loved destination for the local community as well as domestic and international visitors. The project was awarded in the National Trust Heritage Awards



### Kensington Street, Chippendale

On Kensington St, Chippendale an abandoned corner of central Sydney has been utterly transformed. The developer has taken a laneway packed with 1840s terraces hidden within the old Carlton United Brewery and given it a facelift featuring “bold, new structures, spaces and artworks.”

With new insertions among the heritage buildings this has become a unique and highly popular part of the CBD.



### Kings Cross, London

Coal Drops Yard is a former industrial site which, with its proximity to the railway and canal, was used to receive and send coal around Britain. It was redesigned by Thomas Heatherwick, opening to the public in 2018. It features Heatherwick’s so-called kissing roofs, but also preserves the history of the yard from the mid-19th century.

The adaptive re-use of existing heritage buildings has already made this an iconic part of London.



### Waratah Mills, Dulwich Hill

Within the inner-west suburb of Dulwich Hill sits Waratah Mills, the award-winning project which saw heritage listed flourmills and silos from the 1920s refurbished and converted of into 84 unique and contemporary residential apartments. The project successfully achieved a balance between resolving amenity issues and maintaining the architectural integrity of the existing built forms and was awarded by the National Trust.





### Quay Quarter Sydney

This precinct is an entirely new part of the Sydney CBD immediately adjacent to Circular Quay. Alongside the adaptively re-used Quay Quarter Tower, this new area includes numerous historic buildings accompanied by sensitive new insertions.

Awarded by the Australian Institute of Architects, the jury noted “Quay Quarter Lanes is a gift to the city of Sydney. We truly hope that such skillful interventions will continue in the future and act as a benchmark for projects in other cities.”



### Marrickville Library

Decades of advocacy, negotiation and design were required to bring the new Marrickville Library to this site, where an original hospital building has been reused, preserving memories while promising hospitality, egalitarianism and adaptability.

The project won the NSW Premier’s Prize, the Milo Dunphy Award for Sustainable Architecture and an Award for Public Architecture at the Australian Institute of Architects’ 2020 NSW Architecture Awards.



### Joynton Avenue Creative Centre

The adaptive re-use of the former nurses quarters building at the South Sydney Hospital site has turned a heritage building into a place of creativity for a new community.

The centre won the highest accolade, the Lachlan Macquarie award for heritage, and a National award for public architecture at the 2018 National Architecture Awards.

There are countless other examples (which the National Trust would be only too happy to provide) of heritage-led renewal and adaptive re-use of heritage buildings and hospital sites in particular, both locally and internationally.

The adaptive re-use of buildings C61, C64 and C69 at the core of the Cumberland Hospital Site offers a sustainable and wonderful opportunity to create award winning architecture within a unique heritage precinct.



### **Car Parking and Site Access**

The National Trust notes that, with the introduction of the new light rail and the coming of the new metro line, the area will be well served by public transport and that pedestrian and cycle links through the site have been considered in this proposal and are the dominant way people will access the various parts of the site.

The Trust has, over many years and in response to various schemes, raised the conflict between the heritage values of the site and uncontrolled car parking. We believe that the site can be improved by a coordinated approach to vehicle parking.

The Trust does however have serious concerns with the impact that the proposed parking arrangements in the UDF (page 80) will have on the precinct, in particular the impact of the proposed podium parking immediately adjacent to the cultural precinct.

We agree with the NSW Government Architect (State Design Review Panel November 2023) that:

*Above ground parking proposed for building F5 adjacent the Female Factory and heritage core is not supported due to the high sensitivity of this area. Consistent with the precinct parking strategy provided, parking should be located to the perimeter of the precinct.*

The claim in the UDF (page 208) that this parking has been removed is inconsistent with the actual parking strategy in the UDF for the current proposal which notes that Lot F5 includes 6 levels of podium parking. On this basis we also agree with the Heritage Council of NSW (Meeting 535, February 2025) that:

*The proposed Lot Car Parking for building F5 is not supported, due to the heritage sensitivity of the area and its proximity to the Parramatta Female Factory and Institutions Precinct*

The National Trust is also concerned with the four levels of podium parking proposed for Lot H2. This will result in an above ground carpark the same height as the adjacent sandstone walls of the Parramatta Gaol – a very close adjacency and a poor heritage and urban outcome. We note (UDF p.82) that the SES are also to be located in the ground floor of this space, which is within the probable maximum flood zone.

The Trust notes the “Country Centred Objective” in the UDF (p.94) to *provide a sensitive interface to the Cultural Precinct*. We feel that the proposed six levels of above ground parking immediately adjacent to this highly sensitive area is entirely inappropriate and not at all a sensitive interface.

To illustrate the impact of what is proposed, the National Trust has felt it necessary to illustrate a six level podium carpark from a recent development in Woollooware and superimpose this on a view from the cultural precinct (refer following page).

#### **National Trust Recommendation:**

The National Trust agree with the NSW Government Architect and the Heritage Council of NSW that above ground carparking in Lot F5 is not an acceptable outcome for the site, due to the heritage sensitivity of the area and its proximity to the Parramatta Female Factory and Institutions Precinct.

The National Trust maintain that Lot F5 should be removed entirely from any proposal.





*Current view to the north from the courtyard within the “Cultural Precinct” (Source: National Trust)*



*Potential view showing the proposed six levels of podium parking in Lot F5, with a highly detrimental impact upon the proposed World Heritage listed “Cultural Precinct” (Source: National Trust)*