



6 March 2023

Attn: Dominic Crinnion  
NSW Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Dear Dominic,

### **Request for approval to remove the Parramatta Town Drain in accordance with Condition D15**

Sydney Metro exposed the Town Drain at the Parramatta station construction site in 2022 as part of the archaeological program in Lot 74 Macquarie Street so that it could be precisely located in accordance with condition D15 (of SSI-10038). Condition D15 also requires Sydney Metro to consider all options available for in situ retention of the drain. Where retention of any part of the Town Drain in situ is not feasible, Sydney Metro is required to demonstrate to the Planning Secretary why its removal is appropriate.

On 8 September 2022 and 25 October 2022 Sydney Metro received DPE agreement to remove the timber and concrete capping from the drain for conservation and storage and to allow the construction of a temporary road. On 25 January 2023, Sydney Metro received approval for Stage 3 (Sydney Metro West – Rail infrastructure, stations, precincts, and operations (SSI-22765520), which included the removal of the section of the drain within the Parramatta station construction site.

Sydney Metro is now seeking the approval of the Planning Secretary to remove the remaining physical elements and archaeological deposits associated with the Town Drain under Stage 1 of the Sydney Metro West project (SSI-10038). If the removal can be brought forward it would potentially allow more time for the careful removal of the drain, avoid future program risk, and ensure consistency with the rest of the archaeological program. In addition, by removing the drain now, the same Excavation Director who removed the capping and the surrounding archaeology, would oversee the work and the publication of results. This would ensure that all records related to the removal of the drain are consistent.

The Archaeological Research Design and Excavation Methodology (ARDEM) (GML 2021:282-283) includes a hold point for the review of conservation options for both state significant archaeology and the Town Drain. The ARDEM noted that opportunities to conserve archaeology in situ was likely limited.

It should be noted that consistent with other assessments of the Town Drain in Parramatta and the current listings for the drain (Parramatta Local Environmental Plan 2011 I647), the drain has been assessed as being of local significance (GML 2021:239-251).

The questions identified in the ARDEM for the review of conservation options have been addressed below to demonstrate why its removal in Stage 1 is appropriate.

**Is the archaeology intact and substantial? Would this resource be a good representative example of the archaeology type? Can archaeology be protected and conserved in situ throughout project stages, current and future?**

While the archaeology associated with the Town Drain is intact and substantial, and representative of its type, it cannot be protected and conserved in situ throughout all stages of the project as it is located within the footprint of a basement.

Sydney Metro has already received approval to remove the drain under Stage 3 (Sydney Metro West – Rail infrastructure, stations, precincts, and operations) (SSI-22765520). The Environmental Impact Statement (EIS) Technical Paper 5 concluded that the removal of this section of the drain would not irreversibly change the overall significance of the item, and therefore would result in a moderate direct impact to its heritage significance.

**Can the archaeology be relocated? If so, how? And would the archaeology still retain its significance?**

Options for interpreting the town drain including reconstructing it in another location are being explored in the Parramatta Metro Over Station Development (OSD) (SSD-35538829) and the site-specific Heritage Interpretation Plan (HIP). The Design Quality Guidelines submitted as part of the State Significant Development (SSD) application requires consideration of the reconstruction of the Town Drain in Building C. The archaeological salvage and archival recording of the Town Drain in Stage 1 would provide a high level of detail and understanding of what would be required for its potential reconstruction in the OSD.

**Would detailed archaeological excavation, research and interpretation result in a better public benefit?**

Detailed archaeological excavation and research would contribute to our knowledge of the drain and its significance in the development of Parramatta. Removing the drain earlier in the program, could provide time for Sydney Metro to better engage and share knowledge from the archaeological excavation and research. It would also allow for the results of the archaeological excavation and research to be better integrated with the Heritage Interpretation Plan being prepared for the station.

During removal of the Town Drain under Stage 1, further archival recording would be completed for the affected section in accordance with condition D15, augmenting the archival recording of the timber and concrete capping removed in November 2022. This is consistent with the Stage 3 mitigation measures (NAH7) and conditions of approval (E18 and E19) which require the archival recording and removal of the drain to be done in accordance with the Stage 1 ARDEM.

Should you have any questions please do not hesitate to contact Sydney Metro Senior Heritage Advisor Cath Snelgrove on 0408 240 224.

Yours sincerely,



**Ben Armstrong**  
Director Environment Sustainability and Planning,  
Sydney Metro West