

28 November 2025

Andrew McConnell

Senior Development Manager

Commercial and Development, Portfolio Development

Homes NSW

Email: andrew.mcconnell@homes.nsw.gov.au

Dear Mr McConnell,

Subject: 150 The Boulevarde & 34 Dudley Street, Punchbowl – Statement of Heritage Impact

The following short-form report provides a Statement of Heritage Impact (SoHI) for The Boulevarde, Punchbowl Affordable Housing project.

This short-form SoHI has been prepared by Dr. Juanita Kwok (Heritage Consultant) and Daniel Dompierre-Outridge (Heritage Consultant), both of Artefact Heritage and Environment on behalf of Homes NSW for a State Significant Development Application (SSD-83256463) for construction of a residential flat building for the purposes of affordable housing at 150 The Boulevarde and 34 Dudley Street, Punchbowl.

The purpose of this short-form SoHI is to assess the potential heritage impacts that may be caused by the proposed development, and to address the Secretary's Environmental Assessment Requirements (SEARs) for the project issued on 12 May 2025 which identified the following specific assessment requirements:

- **22. Environmental Heritage**

- Where there is potential for direct or indirect impacts on environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (where required), in accordance with the relevant guidelines.

Additional requirements were later issued by the Department of Housing, Planning and Infrastructure (DPHI) in response to proposed changes to local planning provisions under the Punchbowl and Wiley Park Precinct Plan, including the following:

- **12. Heritage**

- Provide an updated Statement of Heritage Impact (SOHI) which gives consideration to proposed heritage items, within the vicinity of the site, under the Punchbowl and Wiley Park Precinct Plan.

This SoHI has been updated to reflect the changes to the identification of, and assessment of impacts to, heritage items in the vicinity of the study area.

A previous Heritage Constraints Assessment prepared by Artefact in May 2025¹ found that the study area has **nil-low** potential to contain archaeological remains of post-1909 structures, but that remains associated

¹ Artefact, 2025, *150 The Boulevarde & 34 Dudley Street, Punchbowl Historic Heritage Constraints Assessment*; attached as Appendix A

with this period have limited research potential and are unlikely to reach the local significance threshold or be considered 'relics' as defined by the Heritage Act. As such, it has been assessed that the proposed development would not have an adverse impact on significant historical archaeological remains, and no further historical archaeological reporting is necessary to satisfy the provisions of the SEARs.

Project background

Homes NSW has identified the subject site as an opportunity to deliver new, quality affordable housing in a well-located area that is serviced by a high level of amenity, services and public transport.

Site Location

The study area is located at 150 The Boulevarde and 34 Dudley Street, Punchbowl, in City of Canterbury-Bankstown's Local Government Area (LGA), (Lot 1 DP735045 and Lot 34 Section 4 DP5701).

The study area has a total site area of 3,889 square metres (sqm) and has two street frontages; The Boulevarde to the north and Dudley Street to the west. Refer to Figure 1.

The site is currently occupied and contains two, two and three storey residential flat buildings comprising 26 units and associated structures including driveways, a bin bay and at grade car parking. A number of existing trees are also located on site.

The site is within 400m of Punchbowl station and Punchbowl local centre. A bus stop is located immediately in front of the site, along Dudley Street providing services to Hurstville, Mortdale and Lakemba.



Figure 1. Map of the study area at 150 The Boulevard and 34 Dudley St, Punchbowl NSW

Methodology

This report has been prepared in consideration of relevant state and federal heritage legislation, including the following:

- Environmental Protection and Biodiversity Conservation Act 1999
- NSW Heritage Act 1977 (Heritage Act)
- NSW Environmental Planning and Assessment Act 1979.
- The methodology and terminology used in the preparation of this report has been informed by the relevant heritage guidelines and standards, including:
- Burra Charter (Australian ICOMOS)
- Assessing heritage significance: Guidelines for assessing places and objects against the Heritage Council of NSW criteria (Department of Planning and Environment, 2023)
- Guidelines for preparing a statement of heritage impact (Department of Planning and Environment, 2023)
- Material Threshold Policy (Department of Planning and Environment, 2022)
- Conservation Plan (J. S Kerr, rev. ed National Trust of Australia [NSW], 1996)
- A Pictorial Guide to Identifying Australian Architecture (Apperly, R.; Irving, R. and Reynolds, P, 1989).

Heritage Management Context

Overview

This section discusses the heritage management framework, notably legislative and policy context, applicable to the study area.

Identification of heritage listed items

The study area at 150 The Boulevard and 34 Dudley Street, Punchbowl contains no listed heritage items within its boundaries, however there is one heritage item in its vicinity listed on the Canterbury-Bankstown LEP. For the purposes of this report, “the vicinity” indicates a radius of 150 metres around the study area.

There are several items of legislation relevant to the proposed works locations. The following state and federal statutory and non-statutory heritage registers were searched to identify whether the works locations were listed on them:

- World Heritage List (WHL)
- Commonwealth Heritage List (CHL)
- National Heritage List (NHL)
- State Heritage Register (SHR)
- Canterbury-Bankstown Local Environmental Plan (LEP) 2023
- Canterbury-Bankstown Development Control Plan (DCP) 2023
- Section 170 Heritage and Conservation Registers.
- Register of the National Estate (RNE)
- The National Trust Register

Items listed on these registers have previously been assessed against the heritage assessment guidelines relevant to their peak governing body. Items that are of Commonwealth, National and World heritage significance have been assessed in accordance with the Environmental Protection and Biodiversity Conservation Act 1999 (the EPBC Act). Items of state or local significance have been assessed against the NSW Heritage Assessment guidelines. Assessments of heritage significance as they appear in relevant heritage inventory sheets and documents, are provided in this assessment.

There are several items of legislation that are relevant to the current study area. A summary of the relevant Acts and the potential legislative implications are provided below for listed items.

Environmental Planning and Assessment Act 1979 (NSW)

The *Environmental Planning and Assessment Act 1979* (EP&A Act) establishes the framework for cultural heritage values to be formally assessed in the land use planning and development consent process. The EP&A Act requires that environmental impacts are considered prior to land development; this includes impacts on cultural heritage items and places as well as archaeological sites and deposits.

The EP&A Act also requires that local governments prepare planning instruments (such as Local Environmental Plans and Development Control Plans [DCPs]) in accordance with the EP&A Act to provide guidance on the level of environmental assessment required. The study area falls within the boundaries of the Canterbury-Bankstown local government areas. Schedule 5 of the Canterbury-Bankstown Local Environmental Plan (LEP) 2023 includes a list of items/sites of heritage significance within this LGA.

It is noted however that when a project is subject to assessment and approval as an SSD or SSI under s5 of the EP&A Act, the conditions and provisions of other state and local instruments are turned off and proposed works are undertaken in accordance with relevant Instruments of Approval. This report has been prepared in accordance with the project SEARs (SSD-83256463).

State Significant Development

The project was classified as SSD-83256463 and SEARs were issued on 12 May 2025 under clause 8A of the NSW *State Environmental Planning Policy (State and Regional Development)* 2011 (SEPP) and section 4.5(a) of the NSW *Environmental Planning and Assessment Act 1979* for the redevelopment of the site at 150 The Boulevarde and 34 Dudley Street, Punchbowl.

Canterbury-Bankstown LEP 2023

Heritage items listed on the Canterbury-Bankstown LEP 2023 are managed in accordance with the provisions of Section 5.10 *Heritage Conservation* of this LEP. Per Section 5.10(5), The heritage objectives of the *Canterbury-Bankstown LEP 2023* are:

(1) Objectives

The objectives of this clause are as follows—

- (a) to conserve the environmental heritage of Canterbury-Bankstown,*
 - (b) to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,*
 - (c) to conserve archaeological sites,*
 - (d) to conserve Aboriginal objects and Aboriginal places of heritage significance.*
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Under *Clause 5.10 (5) Heritage assessment*²:

The consent authority may, before granting consent to any development—

(a) on land on which a heritage item is located, or

(b) on land that is within a heritage conservation area, or

(c) on land that is within the vicinity of land referred to in paragraph (a) or (b),

require a heritage management document to be prepared that assesses the extent to which the carrying out of the proposed development would affect the heritage significance of the heritage item or heritage conservation area concerned.

There are **no** heritage items within the boundaries of the study area.

There is **one** item listed on the *Canterbury-Bankstown LEP 2023* approximately 115 metres west of the study area:

- 'War memorial and street trees', Broadway (between The Boulevarde and Canterbury Road (Broadway)), Punchbowl, LEP no. I222

Canterbury-Bankstown Development Control Plan 2023

Development Control Plans (DCP) outline controls and restrictions which aim to guide developments within specific regions. Canterbury-Bankstown has a diverse heritage including Aboriginal and archaeological sites, trees, public buildings and Federation and Inter-War areas.

Under the *Canterbury-Bankstown Development Control Plan 2023* Council is committed to protecting and conserving places of heritage significance, which include:

- Heritage items, archaeological sites, Aboriginal heritage sites and heritage conservation areas that are identified in the Canterbury-Bankstown Local Environmental Plan 2023 (Schedule 5).
- Properties included in an Interim Heritage Order.
- Draft heritage items, draft archaeological sites, draft Aboriginal heritage sites and draft heritage conservation areas that are included in a planning proposal that has been publicly exhibited.
- Sites included in a State Government Heritage Register under section 170 of the Heritage Act 1977.

The *Canterbury-Bankstown Local Environmental Plan 2023* and *Canterbury-Bankstown Development Control Plan 2023* combine to regulate effective and orderly development, consistent with *Connective City 2036*. The LEP is Council's principal planning document. It provides objectives, zones and development standards such as lot sizes, floor space ratios, building heights and heritage conservation. The DCP supports the LEP by providing additional objectives and development controls for protecting and conserving places of heritage significance.³

² NSW Government, 'Canterbury-Bankstown Shire Local Environmental Plan 2023 - NSW Legislation', <https://legislation.nsw.gov.au/view/html/inforce/current/epi-2023-0336#sch.5>

³ Canterbury-Bankstown Development Control Plan, 2023, Chapter 4 Heritage, 4.1 Introduction, June 2023
<https://www.cbccity.nsw.gov.au/planning-and-building/planning-city/planning-controls-and-policies/canterbury-bankstown-development-control-plan>

Punchbowl and Wiley Park Precinct Plan: Recommended Planning Provisions

Punchbowl and Wiley Park have been identified by the State Government as Transport Oriented Development (TOD) Precincts suitable to deliver additional housing in walkable proximity to the future Metro Stations.

Consistent with State Government directives, Council has developed an alternative approach to deliver and exceed the projected housing numbers established for these precincts by the Department of Planning, Housing and Infrastructure (DPHI) through TOD and Low- and Mid-Rise Housing (LMRH) reforms. Council's approach seeks to safeguard the retention of local jobs, support community infrastructure and appropriately reflect the values of residents, local businesses and community stakeholders.

Council has drafted a Precinct Plan for the Punchbowl and Wiley Park village centres and is at the stage of exhibiting proposed amendments to planning controls applicable to these Precincts. Council's exhibition timing and process are determined by DPHI's requirements and, therefore, do not follow the usual engagement practices as outlined in Council's Community Participation Plan.

Council's Recommended Planning Provisions (RPP) aim to amend the Canterbury-Bankstown Local Environmental Plan 2023 (the LEP) as an alternative approach to achieving the housing targets established by the TOD Program in Punchbowl and Wiley Park. The proposed amendments to the LEP have taken a site-by-site approach and relate to:

- Land use zoning
- Height of buildings (including provisions for rooftop gardens) • Floor space ratio (including provisions for underground floor space)
- Minimum lot sizes and minimum frontages for specified types of development
- Active street frontage requirements in key locations
- Prohibition of residential uses from select sites on Canterbury Road (through exclusion from existing Additional Permitted Uses)
- Listing of additional Heritage items
- Identify sites for public easement or dedication to provide public benefit including additional public open space, pedestrian connections and community infrastructure
- Apply an affordable housing contribution scheme.

The State Government's approach (inclusive of TOD Precinct and LMRH reforms) would have delivered an estimated 1,600 additional dwellings within the precincts (approx. 600 in Wiley Park and 1,000 in Punchbowl). Council's alternative RPP are anticipated to deliver an estimated 4,000 additional dwellings by 2045 (approx. 1,500 Wiley and 2,500 in Punchbowl).

The existing (Figure 2) and proposed (Figure 3) maps of heritage items listed on the Canterbury-Bankstown LEP have been included below. In total, two additional heritage items are proposed to be listed on the LEP that would be in the vicinity (within 150m) of the study area:

- 'Inter-War church 'Punchbowl Uniting Church', 11-15 Broadway, Punchbowl (Proposed)
- 'Inter-War houses, 22-24 Broadway, Punchbowl (Proposed)

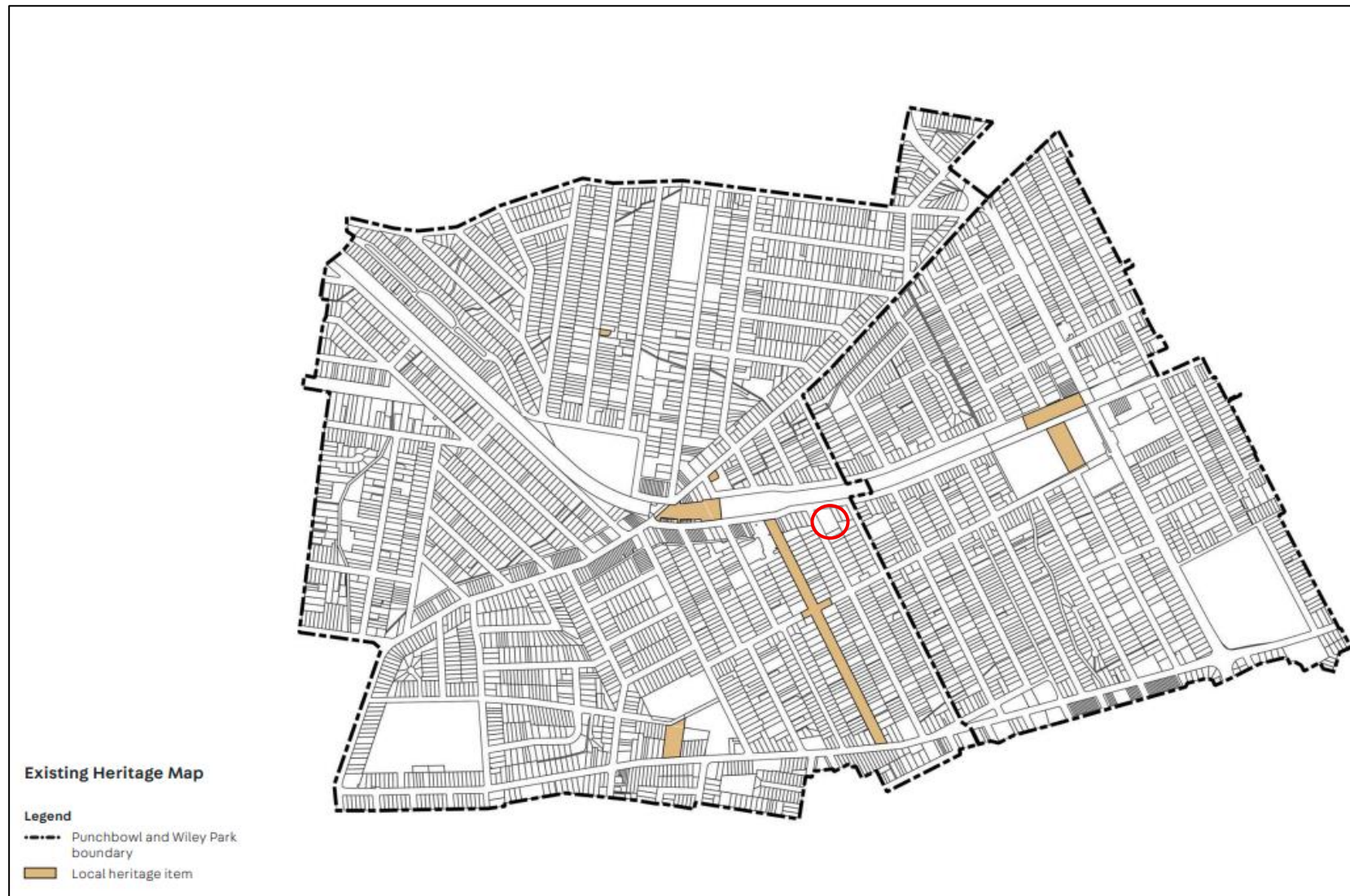


Figure 2. Existing Heritage Map of items listed on the LEP in Punchbowl and Wiley Park, with the location of the study area outlined in red (Source: Canterbury-Bankstown Council, May 2025, *Punchbowl and Wiley Park Precinct Plan*)

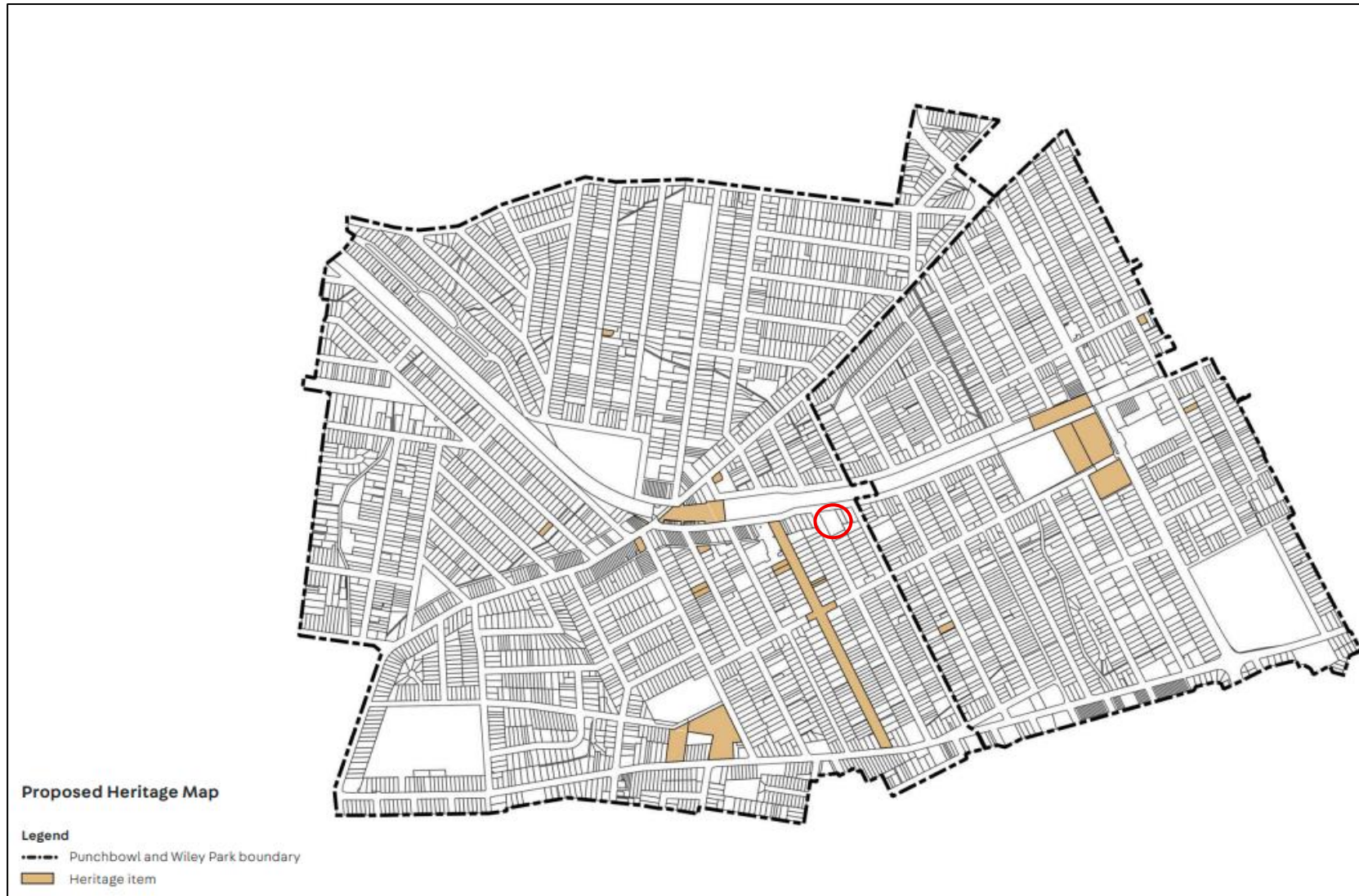


Figure 3. Proposed Heritage Map of items to be listed on the LEP, with the location of the study area outlined in red (Source: Canterbury-Bankstown, May 2025)

Transport Oriented Development (TOD) scheme

The site is located in the Deferred Punchbowl Transport Oriented Development (TOD) Precinct. An environmental planning instrument (EPI) amendment is currently being considered by DPHI and based on Council's draft Precinct Plan for Punchbowl seeks to increase the sites maximum building height from 11.5m to part 33m and part 23m and maximum floor space ratio from 0.9:1 to part 2.5:1 and part 1.7:1. There are no changes proposed to the sites R4 High Density Residential land use zoning.

Consideration of the of the proposed EPI amendment is currently being considered by DPHI and is anticipated to be finalised by the end of 2025, prior to the determination of this SSD application.

Summary of heritage-listed items

The study area comprises a section of the suburb of Punchbowl which contains no listed heritage curtilages as outlined in Table 1. The study area is located in the vicinity of heritage items listed on which is also a heritage item listed on registers. The curtilages of these items are illustrated below in Figure 4.

Table 1: Results of register searches for the study area and heritage items in its vicinity

Item	Address	Significance	Listing	Listing number	Distance from Study area
'War memorial and street trees'	Broadway (between The Boulevard and Canterbury Road (Broadway)), Punchbowl, 2196	Local	Canterbury-Bankstown LEP 2023	I222	115 m
'Inter-War church 'Punchbowl Uniting Church''	11-15 Broadway, Punchbowl, 2196	Local	(Proposed) Canterbury-Bankstown LEP 2023	N/A	142 m
'Inter-War houses'	22-24 Broadway, Punchbowl, 2196	Local	(Proposed) Canterbury-Bankstown LEP 2023	N/A	110 m

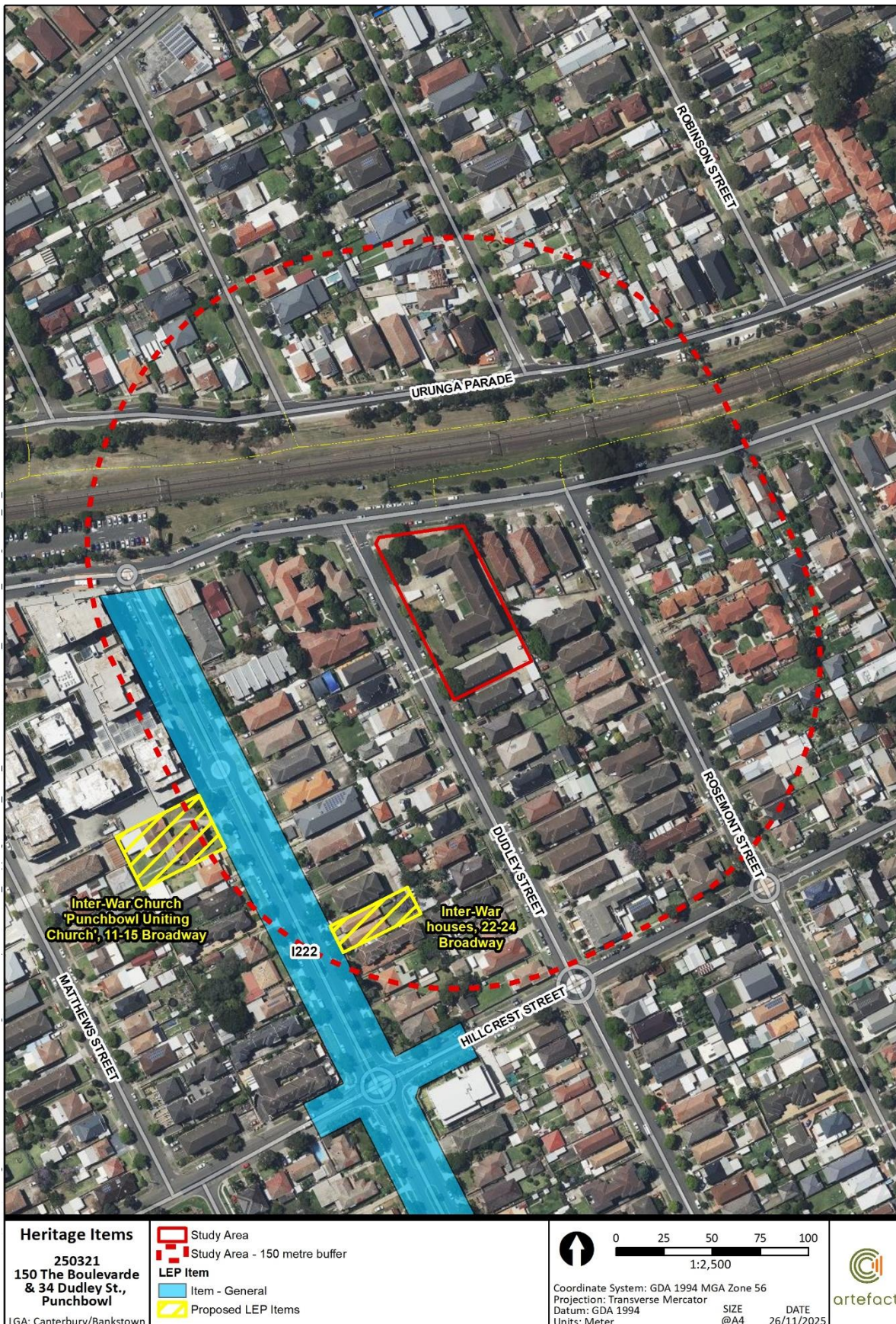


Figure 4. Map of heritage curtilages in the vicinity of the study area

History and description of the site

Historical overview

According to historian Paul Irish, Aboriginal people of Sydney were divided into clan groups of twenty-five to sixty people, who traced their lineage through their fathers back to a common ancestor. From its headwaters around Strathfield the Cooks River passed through the estates of Wann, Cadi and Gamey. The clans with rights to these estates were known as the Wangal, Cadigal and Gameygal, 'gal' meaning the people of each clan estate.⁴ Walking tracks through the Cooks River valley, they would have followed ridges and spurs but also crossed creeks and the Cooks River. Aboriginal people are also said to have crossed the Cooks River at Fatima Island near Tempe and at the tidal limit of the river at Belfield (known historically as the Punch Bowl).⁵

One of the earliest Aboriginal men to come into contact with the British colonisers was Bennelong, a Wangal man whose clan lands included the middle and upper reaches of the Cooks River. In 1789 Bennelong was abducted from Manly by order of Governor Phillip in an attempt to establish communications with local Aboriginal people.⁶

Aboriginal warrior Pemulwuy (c.1850-1802) initiated a war of resistance across Sydney in the early 1790s. When Pemulwuy was killed in 1802, his son Tedbury continued his father's campaign of guerrilla warfare. Armed Aboriginal resistance to European settlement around the Cooks River valley and the coastal parts of Sydney effectively ended in 1810, after Tedbury was shot and killed at Parramatta.⁷

Many of the first grants of land along the Cooks River were relatively large (several hundred hectares). These were added to and interspersed over the next few decades by smaller grants.⁸ Whilst some grants contained houses with small clearings of sown fields or orchards, most land was initially used for grazing and timber cutting and remained unoccupied.⁹ In 1831, fifty acres of land was granted to Brian Nowland by Lieutenant General Ralph Darling. The parish maps show that Nowland's property remained unchanged until the early 20th century. The last group of farms to be granted in the Punchbowl area, the "western farms" were granted to William and Henry Howell. Immediately north of the Howell grants was the farm of Brian Nowland. At this time, the area was known as Belmore. The population of the area grew slowly until the Canterbury Road was cut through from the Cooks River to join the Punch-Bowl Road in 1855. Timber felling continued to be a lucrative business in the region. However, the possibility of a railway line in the district encouraged numerous landowners to subdivide, and subsequently, many of the allotments were purchased by other land speculators.¹⁰

The Bankstown Railway Line was built between 1880 and 1895 when the NSW Government considered and built the line from Sydenham to Belmore. Between 1896 and 1909 the line was extended from Belmore to Bankstown, where the railway terminated for the next 19 years.¹¹ As the terminus of the 1895 railway line had been called "Belmore", when the extension of the line to Bankstown was opened in 1909, a new name had to be found for the railway station. "Punch bowl", the name given to the ford where the George's River

⁴ Paul Irish, *Aboriginal History along the Cooks River*, written for the Cooks River Alliance, MARY DALLAS CONSULTING ARCHAEOLOGISTS.

⁵ Ibid,

⁶ Ibid, 19.

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⁸ Ibid.21.

⁹ Paul Irish, *Aboriginal History along the Cooks River*, written for the Cooks River Alliance, MARY DALLAS CONSULTING ARCHAEOLOGISTS, 21.

¹⁰ Artefact Heritage, 150 The Boulevard & 34 Dudley Street, Punchbowl Historic Heritage Constraints Assessment Report to Homes NSW May 2025.

¹¹ City Rail, "The Bankstown Line: An early history, <https://web.archive.org/web/20060825131015/http://www.cityrail.info/news/060206-bankstown2.jsp>

Road crossed the Cook's River, was an old name in the region. The railway station became known as Punchbowl, and the surrounding area also became known by this name.¹²

As the rail line neared, plans were made in 1909 to subdivide land billed as "the Emerald Hills Estate". In advertisements for the auction, the land was described as "well soiled" and the potential for "fruit or vegetable culture" and "beautiful gardens" was extolled. The lots were generally a quarter of an acre.¹³ The land which had been part of Brian Nowland grant was subdivided as part of the Emerald Hills Estate in 1909. When the Emerald Hills Estate was auctioned by Arthur Rickard for F. T. Matthews in 1909, in response to the opening of the railway to Bankstown, The [sic] Broadway was especially made as ... wider than all the others in the Estate.¹⁴

The War Memorial

The war memorial in the median strip on The Boulevarde at Punchbowl was erected in 1919 to honour soldiers from Punchbowl who fought in WWI. It carries the inscription:

"To the Punchbowl soldiers who fought in the Great War, 1914-1919, their fellow citizens raised this token of appreciation."

The Punchbowl soldiers' memorial was unveiled by the State Commandant (Major-General Lee), on Saturday 20 December 1919. It was reported that several hundred people were present.

General Lee addressed the crowd saying "The work of our soldiers was of such magnitude that it will be many years before we realise what they have actually accomplished. On the blood of the men who died will the future of Australia be built." The memorial was described as "constructed of freestone, of modest but neat design, and stands about 20ft high. Over 70 names are enrolled upon it."¹⁵

¹² Artefact Heritage, 150 The Boulevarde & 34 Dudley Street, Punchbowl Historic Heritage Constraints Assessment Report to Homes NSW May 2025.

¹³ 1909 'Advertising', *The Sunday Sun* (Sydney, NSW : 1903 - 1910), 28 March, p. 3. , viewed 18 Jul 2025, <http://nla.gov.au/nla.news-article227027511>

¹⁴ State Heritage Register, 'War Memorial and Street Trees', Historical Notes, <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=1300118>

¹⁵ 1919 'PUNCHBOWL SOLDIERS' MEMORIAL', *The Sydney Morning Herald* (NSW : 1842 - 1954), 23 December, p. 7. , viewed 18 Jul 2025, <http://nla.gov.au/nla.news-article28093701>

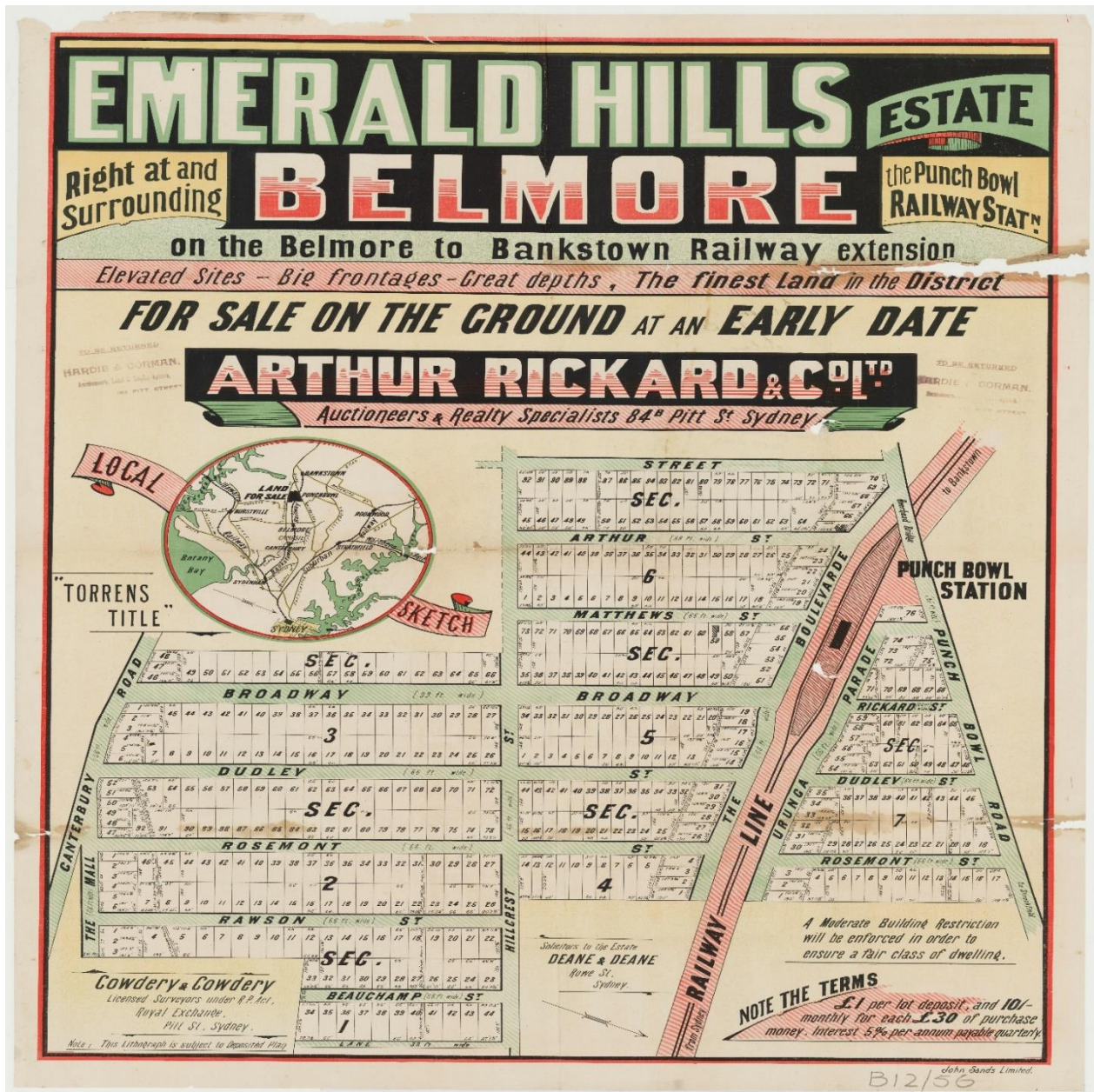


Figure 5: 1909 map of the subdivision sale of the Emerald Hills Estate in Punchbowl (Source: SLNSW Z/SP/B12/56)

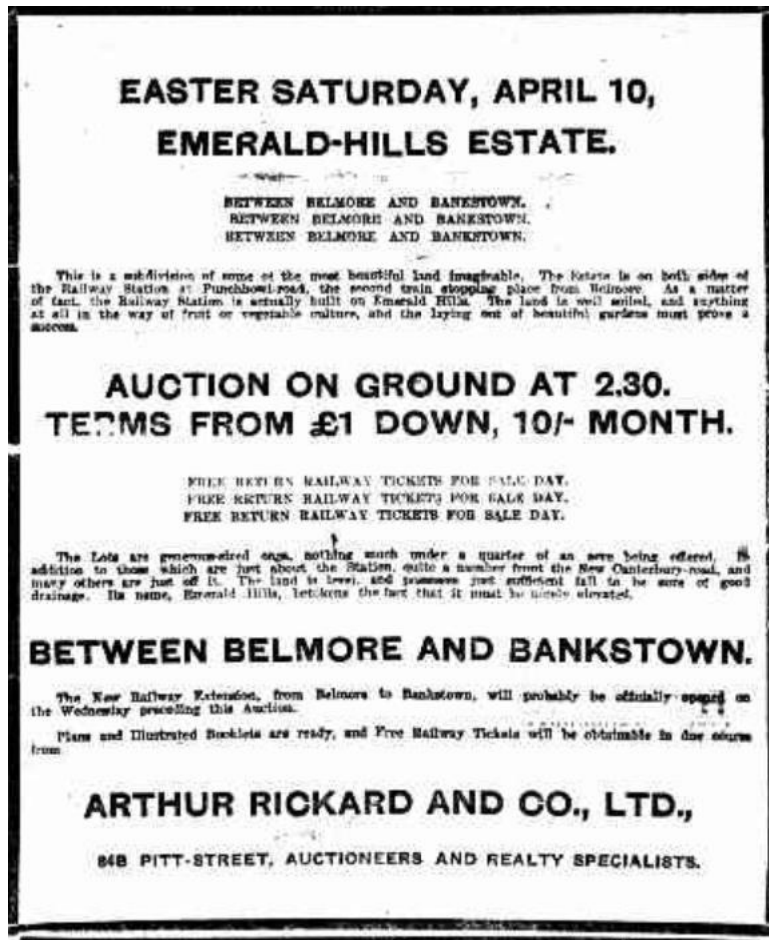


Figure 6: 1909 'Advertising', *The Sunday Sun* (Sydney, NSW : 1903 - 1910), 28 March, p. 3. , viewed 18 Jul 2025, <http://nla.gov.au/nla.news-article227027511>

Site inspection and building description

A site inspection was conducted on 30 July 2025 by Daniel Dompierre-Outridge (Heritage Consultant) of Artefact Heritage. The aim of the site inspection was to inspect the area of proposed impacts, inform a preliminary assessment of archaeological potential, and to identify heritage items and heritage significant fabric of the item and in the vicinity that may be affected by the project. The inspection was undertaken on foot and a photographic record was made.



Figure 7. Photo of the south corner of the study area, facing northeast from Dudley Street



Figure 8. Photo of the western aspect of the current building occupying the study area, facing northeast



Figure 9. Photo of the north corner of the study area at the intersection of The Boulevard and Dudley Street, facing northeast



Figure 10. Photo of the streetscape of Dudley Street south of the study area, facing northeast toward 150 The Boulevard



Figure 11. Photo taken from the western edge of the study area, facing southwest in the direction of the Broadway heritage item (not visible in frame)



Figure 12. Photo of the intersection of The Boulevard and Dudley Street, facing west in the direction of Punchbowl Station (not visible in frame)



Figure 13. Photo of the study area taken from The Boulevard, facing east



Figure 14. Photo taken from Punchbowl Station on The Boulevard in the direction of the study area, facing east



Figure 15. Photo of Broadway, featuring the war memorial cenotaph (part of the "War Memorial and Street Trees" LEP item) facing southeast



Figure 16. Photo of the war memorial cenotaph on Broadway, facing southeast



Figure 17. Photo of the street trees that form part of the "War Memorial and Street Trees" LEP item on Broadway, facing south



Figure 18. Photo of the streetscape on Broadway, facing northeast in the direction of the study area (not visible in frame)

Assessment of heritage values

'War memorial and street trees' Canterbury-Bankstown LEP no. I222

Statement of Significance

The LEP entry for the 'War memorial and street trees' item on the NSW State Heritage Inventory (SHI) provides the following statement of significance:

*"An important streetscape with plantings typical of the early twentieth century in a street specially left wider than the others in the estate by the developer. Few other such streets survive in the Municipality."*¹⁶

The statement of significance is further supplemented by the following description of the item:

Planting of palms and exotics along a wide median strip up The Broadway [sic], plus palms along Hillcrest Road. Listing includes tall araucaria in front of No.28 The Broadway. War Memorial near The Boulevarde, consists of sandstone pillar with brass plate inscribed with the names of war dead. The plantings around it date from circa 1960s and are not included.

From the above extracts of the item's entry on the SHI, the heritage item has discernible heritage significance at the local level in terms of its historical, aesthetic, and social values. As a public-facing monument in an important thoroughfare, the War Memorial pillar (or cenotaph) is intended to be seen and appreciated by the public.

Proposed Canterbury-Bankstown LEP items

The entries for the 'Inter-War church 'Punchbowl Uniting Church'' and the 'Inter-War houses' items that are proposed to be added to the LEP have not yet been made available, and therefore the following is a preliminary desktop assessment of the possible values of the items.

From a review of available images of the two items, and listings for similar listed items constructed in the Inter-War period, it can be reasonably assumed that the two items proposed for listing have aesthetic significance deriving from their distinctive architectural style. Both items appear to be in good condition, though the integrity (i.e. originality) of their fabric cannot be fully assessed from a desktop review alone.

Listed heritage items constructed in the Inter-War period frequently also possess historical significance. As the church appears to still be active, it is likely that it possesses social significance in addition to aesthetic and historical significance. The church fits the Inter-War Gothic style, with pointed windows, asymmetrical massing, parapeted gables, steep roofs, crenellations, diamond patterned glass, and a large entrance arch.

Depending on their level of integrity, the two houses may also possess representative heritage value deriving from their representativeness of the Inter-War style. The houses appear to fit the California Bungalow variety of Inter-War brick houses, featuring low-pitched roofs, dark-coloured bricks, street-facing gables and porch, a projecting window frame, geometric lead-light glazing, grouped posts, terracotta finials, and Marseilles tiles.

¹⁶ "War Memorial and Street Trees", State Heritage Inventory, updated 31 July 2002, <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=1300118>

Description of the proposed works

The proposed development comprises the construction of a new residential flat building for the purpose of affordable housing. Plans and sections of the proposed development are included below in Figure 19 through Figure 22; they have been extracted from the *HAFF Punchbowl Rev A SSDA Architectural Documents Drawings* report prepared by Collins and Turner dated 22 September 2025, issued to Artefact on 12 September 2025.

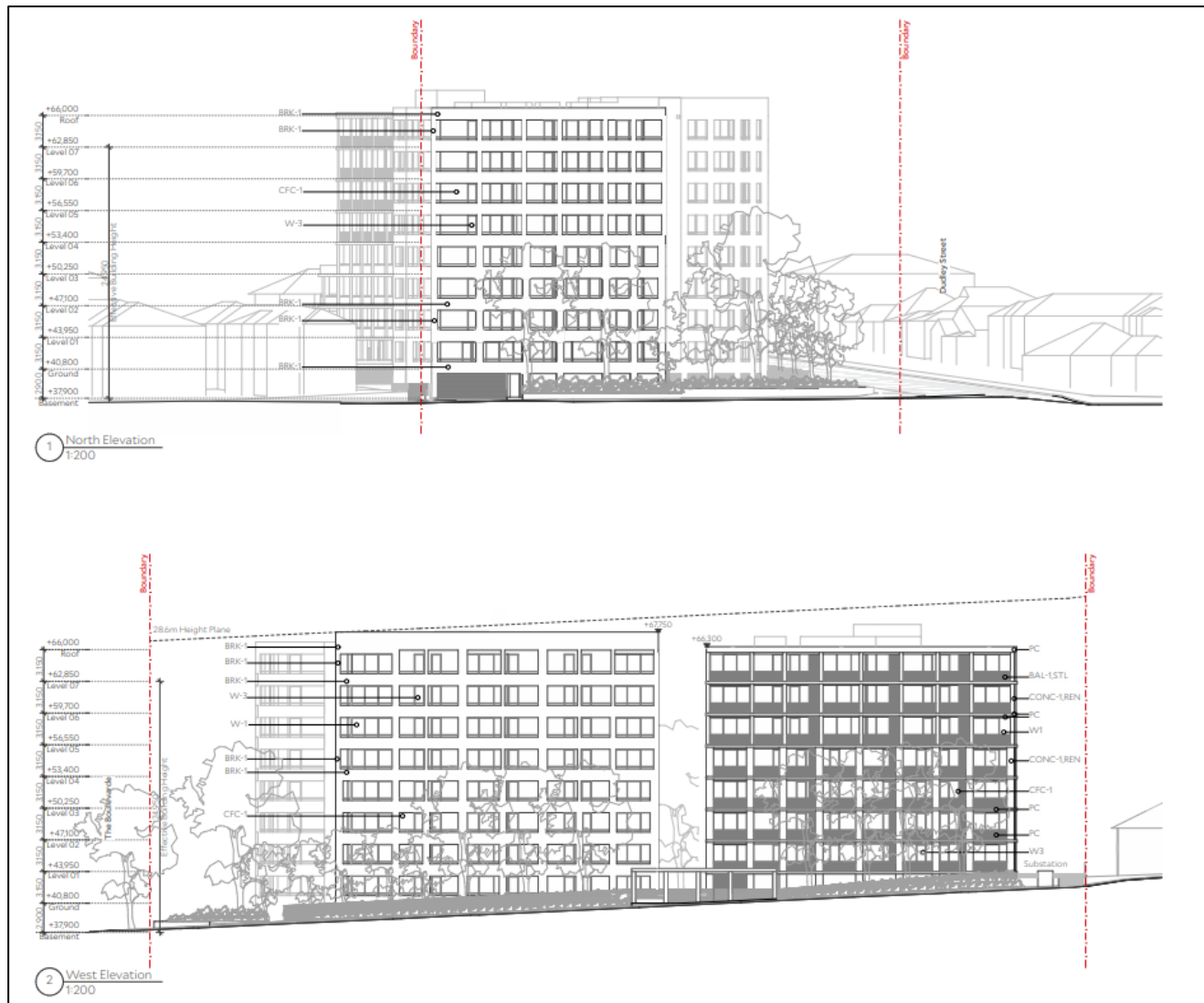


Figure 19. North and west elevations of the proposed development (Source: Collins and Turner, *Revision A 22/09/2025*)

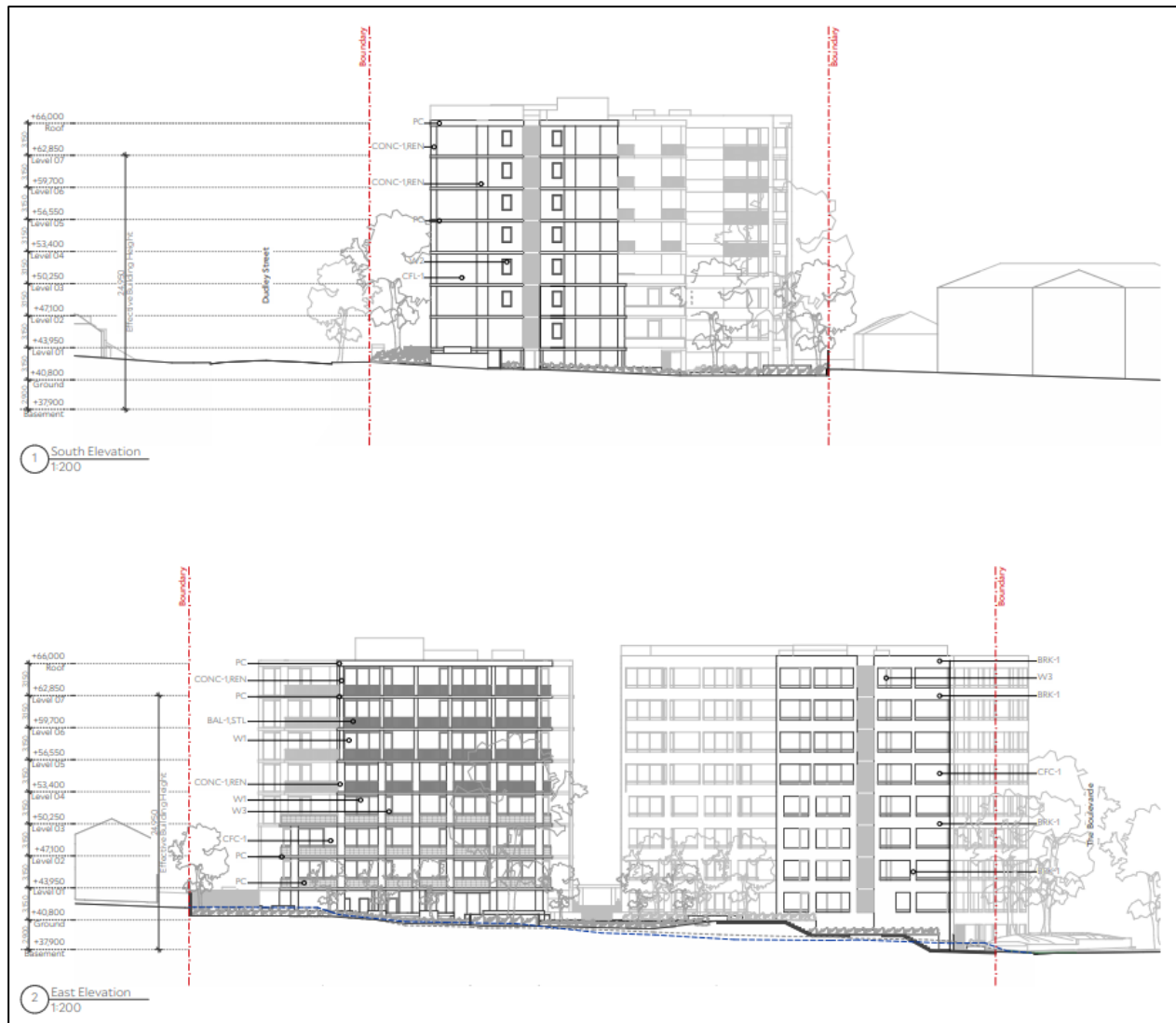


Figure 20. South and east elevations of the proposed development (Source: Collins and Turner, *Revision A 22/09/2025*)



Figure 21. Ground floor and 1st floor plans of the proposed development (Source: Collins and Turner, *Revision A 22/09/2025*)



Figure 22. Materials board and CGI of the proposed façade fronting on The Boulevard, facing south (Source: Collins and Turner, *Revision A 22/09/2025*)



Figure 23. CGI of the proposed façade fronting on Dudley St, facing southeast (Source: Collins and Turner, *Revision A 22/09/2025*)



Figure 24. CGI of the proposed façade fronting on Dudley St, facing northeast (Source: Collins and Turner, *Revision A 22/09/2025*)

Assessment of heritage impact

This section assesses the heritage impact of the proposed works at the study area on heritage values within the study area. Justifications are also provided for the proposed works.

Within this approach, the objective of a heritage impact assessment is to evaluate and explain how the proposed works will affect the heritage value of the study area and/or place. A heritage impact assessment should also address how the heritage value of the site/place can be conserved or maintained, or preferably enhanced by the proposed works.

Terminology

In order to consistently identify the impact of the proposed works, the terminology contained in the following table has been referenced throughout this document. The terminology and definitions are based on those contained in guidelines produced by Heritage NSW¹⁷ and are shown in Table 3.

Table 3: Terminology for assessing the magnitude of heritage impact.

Grading	Definition
Total loss of significance	Major adverse impacts to the extent where the place would no longer meet the criteria for heritage listing.
Adverse impact	Major (that is, more than minor or moderate) adverse impacts to heritage significance, defined as removing significant features, obscuring key views, or removing evidence of significant historical associations, which require substantial changes to the scope of works or design to sufficiently reduce those impacts. The material threshold applies when substantial changes to the application are required to reduce the adverse impacts to a moderate or minor level.
	Moderate adverse impacts to heritage significance. Actions in this category would include removal of an important part of a heritage item's setting or temporary removal of significant elements or fabric. The impact of these actions could be reduced through appropriate mitigation measures.
	Minor adverse impacts to heritage significance, defined as impacts to heritage significance that are minor enough that they are outweighed by other benefits of the application, for example sympathetic alterations to an original non-compliant balustrade to enable continued public use.
Little to no impact*	An alteration to heritage significance that is so minor that it is considered negligible. * Little to no impact (as opposed to no impact) acknowledges that any change will result in some level of impact/alteration to heritage significance.
Positive impact	Alterations that enhance the ability to demonstrate the heritage significance of a listed place.

¹⁷ Heritage NSW, *Material Threshold Policy*, 2020

Table 4: Terminology for heritage impact types

Impact	Definition
Physical	Impacts resulting from works located within or outside the curtilage boundaries of the heritage item, caused by removing or altering the item or fabric of heritage significance
Visual	Impact to views, vistas and setting of the heritage item resulting from proposed works within or outside the curtilage boundaries of the heritage item.
Potential	Impacts resulting from increased noise, vibrations and construction works located within or outside the curtilage boundaries of the heritage item.
Archaeological	Impacts to potential archaeological remains located within the curtilage boundaries of the heritage item.

Physical heritage impacts

As noted above, the study area occupies a section of the suburb of Punchbowl which does not contain any listed heritage curtilages. The proposed development on the lot on the corner of The Boulevarde and Dudley Street (outlined above) would therefore not result in any adverse physical heritage impacts within the study area.

The proposed development would be unlikely to result in adverse physical impacts to the 'War memorial and street trees' heritage item (LEP no. I222), or the two items proposed to be listed on the LEP (i.e. the 'Inter-War church 'Punchbowl Uniting Church' at 11-15 Broadway and the 'Inter-War houses' at 22-24 Broadway). This is due to the distance between the study area and the items, which are located over 100 metres apart.

Physical impacts: Little to no impact

Visual heritage impacts

As noted above, the study area does not contain any listed heritage curtilages, and therefore there would be no adverse visual heritage impacts within the study area caused by the proposed development. Furthermore, although the proposed development would alter the streetscape of The Boulevarde and Dudley Street, this streetscape does not possess any discernible heritage significance.

The proposed development would feature a flat façade inset with squared windows and balconies, and a material palette that would include primarily brown bricks and glass. Due to its height when complete (8 storeys), the proposed development would be visible from within the curtilage of the 'War memorial and street trees' heritage item, which extends from The Boulevarde in the north to Canterbury Road in the south. The memorial is a monument intended to be seen and appreciated by the public, as is the row of street trees that extends down the centre length of Broadway. It would also be visible to the two proposed LEP items on Broadway (i.e. the 'Inter-War church 'Punchbowl Uniting Church' at 11-15 Broadway and the 'Inter-War houses' at 22-24 Broadway). The church in particular would have a line of sight to the upper levels of the proposed development.

The construction of the proposed development, though visible itself above the extant buildings fronting on Broadway, would not impede the visibility of the heritage item. The memorial has aesthetic significance as a recognisable, early-20th century monument in the community, and although the proposed development would have a dissimilar character (being a 21st century development), it is unlikely that it would result in an intrusive addition to the heritage item's visual curtilage, which has experienced modifications over the course of

decades. The proposed development would therefore likely have **little to no adverse** visual impacts on the significance of the heritage item.

The proposed development would be of a design that contrasts with the Inter-War styles of the two proposed LEP items. The simple geometric form of the proposed development would not be sympathetic to the more complex style of the items, which feature pitched roofs and articulated facades. However, the proposed development would likely not be prominently visible from the proposed heritage items due to distance of the items from the study area, as well as the presence of street trees and extant two-storey buildings on Broadway. The proposed heritage items would likely experience **little to no adverse** visual impact as a result of the proposed development.

In addition, although the proposed development would contribute to massing in the streetscape which would be visible from the 'War memorial and street trees' and proposed LEP heritage items, when complete the proposed development would be within the allowable maximum building height limit proposed under the Punchbowl Transport Oriented Development (TOD) Precinct rezoning (Figure 25). Views of the proposed development from the heritage item would be partially obstructed by extant vegetation and buildings on Broadway. Moreover, given the distance between the item and the study area, the proposed development would not cause significant overshadowing of the item, as illustrated below in Figure 26.

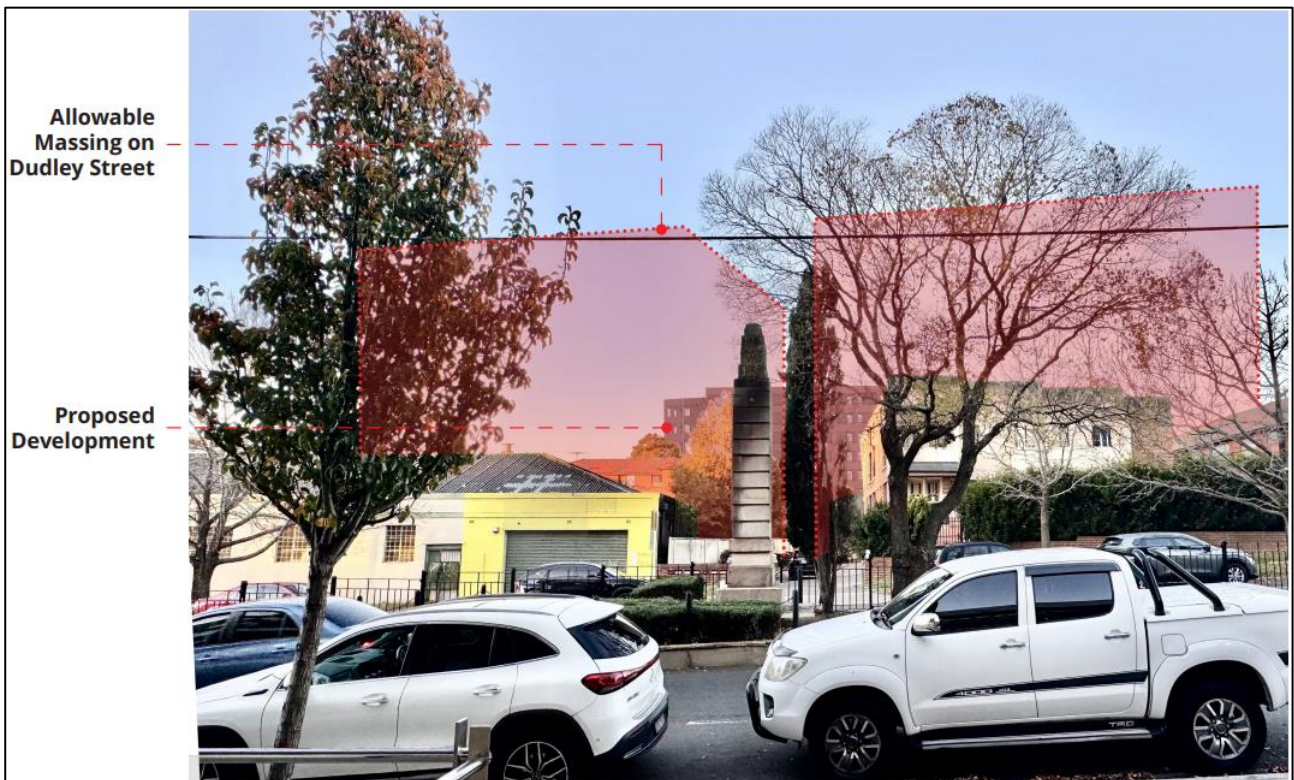


Figure 25. CGI of the proposed development and allowable massing in the TOD precinct seen from the 'War memorial and street trees' heritage item curtilage (Source: Collins and Turner, *HAFF Punchbowl Cenotaph View Analysis*, 2025)



Figure 26. Shadow diagram of the proposed development (Source: Collins and Turner, Revision A 22/09/2025)

Overall, the proposed development would retain the visibility of the 'War memorial and street trees' item, as well as that of the two proposed heritage items on Broadway. The presence of vegetation and buildings would reduce the visibility of the proposed development from Broadway, and there would be no overshadowing of the heritage items' curtilages. As a result, the proposed development would have **little to no adverse** visual impact on the significance of heritage items in the vicinity of the study area.

Visual impacts: Little to no impact

Potential heritage impacts

Potential impacts in the context of this project refer to impacts caused by construction-related vibrations. The minimum distance for cosmetic damage from construction related vibration has been established to be items located less than 25 m away from the construction work as determined by Transport for NSW in their *Construction Noise and Vibration Guideline (Roads)* prepared in September 2024.

As the study area is located over 25 m from the nearest listed heritage item, it is considered that there would be **little to no** potential/vibrational impacts to heritage curtilages as a result of the proposed works.

Potential impacts: Little to no impact

Summary of heritage impacts

This section assesses the potential physical and visual impacts of the proposed works on heritage items within the study area itself and its vicinity. The heritage impacts of the proposed works are outlined in Table 2.

Table 2: Assessment of heritage impact.

Item Name	Item/Listing Number	Potential physical impacts	Potential visual impacts
'War memorial and street trees'	Canterbury-Bankstown LEP 2023 no. I222	The works have been assessed as having little to no physical impacts to the item.	The works have been assessed as having little to no visual impacts to the item.

Cumulative impacts

Cumulative impacts refer to the combined or overlaid or added actions and interactions within a particular place associated with the past, present and the reasonably foreseeable future.

Though the proposed development is a standalone project, it is likely that future developments will take place in the surrounding area, which will be of a similar height and size. **Error! Reference source not found..** These future developments would be undertaken within the proposed draft planning provisions of the TOD program, which is accelerating approvals for residential developments in precincts surrounding transportation corridors in NSW, including Punchbowl. Taken together, the proposed and future developments would considerably alter the character and streetscapes of the suburb of Punchbowl in the vicinity of the rail corridor and Punchbowl Railway Station. This would also result in a commensurate increase of structural massing in the visual curtilage of the 'War memorial and street trees' heritage item.

Questions to be considered in a statement of heritage impact

Heritage guidelines¹⁸ prepared by the NSW Heritage Office (now Heritage NSW, DPHI) outline design considerations for projects that involve new developments in the vicinity of heritage items.

Design considerations are discussed in Table 3 below.

Table 3. Heritage considerations for the proposal (Source: Heritage NSW, 2023)

Heritage Consideration	Discussion
General considerations for the proposal	
<i>Do the proposed works include removal of unsympathetic alterations and additions? How</i>	The proposed works would not involve alterations to heritage fabric, and would result in little to no adverse physical and visual impacts to the heritage significance of heritage items in the vicinity of the study area.

¹⁸ 'Guidelines for preparing a statement of heritage impact', Department of Planning and Environment, 2023

Heritage Consideration	Discussion
<i>does this benefit or impact the heritage item and its significance?</i>	
<i>Do the proposed works affect the setting of the heritage item, including views and vistas to and from the heritage item and/or a cultural landscape in which it is sited? Can the impacts be avoided and/or mitigated?</i>	The proposed development would result in alterations to the visual curtilage of The Boulevarde and Dudley St. However, neither road is a listed heritage item or in a HCA, and there are no significant views associated with them in the study area. The proposed works would be visible to the 'War memorial and street trees' heritage curtilage in the vicinity of the study area, however it is unlikely that the proposed development would be intrusive in this setting given previous modifications to the Broadway streetscape over the course of the 20 th century. The visibility of the War Memorial pillar would not be reduced by the proposed development, nor would the heritage item as a whole experience considerable overshadowing.
<i>Are the proposed works part of a broader scope of works?</i>	Although the proposed development would be undertaken under the proposed draft provisions of the TOD program's planning controls, it is a standalone SSD project subject to its own SEARs.
<i>Does this proposal relate to any previous or future works? If so, what cumulative impact (positive and/or adverse) will these works have on the heritage significance of the item?</i>	The proposed development is the latest development in a streetscape that has experienced modifications over the past several decades. However, the proposed development is not related to any specific past or future project. There are likely to be little to no cumulative heritage impacts as a result of the proposed works.
<i>Are the proposed works to a heritage item that is also significant for its Aboriginal cultural heritage values? If so, have experts in Aboriginal cultural heritage been consulted?</i>	This report does not include an assessment of Aboriginal cultural heritage values.
<i>Has the applicant checked if any other approvals or a separate process to evaluate the potential for impacts is required?</i>	This report includes advice on the appropriate approval pathway for the proposed development. It fulfils the heritage impact reporting requirement included in the SEARs for the project.
<i>Do the proposed works trigger a change of use classification under the National construction code that may result in prescriptive building requirements? If so, have options that avoid impact on the heritage values been investigated?</i>	The proposed development would not trigger a change of use classification.
<i>If the proposed works are to a local heritage item, are the requirements of the development control plans or any local design guidelines that may apply to the site considered?</i>	The proposed works are taking place in the vicinity of a heritage item listed on the Canterbury-Bankstown LEP 2023. However, no specific provisions of the Canterbury-Bankstown DCP were found to apply to the location of the study area. Furthermore, as the proposed works would have little to no adverse physical and visual impacts to the heritage significance of the items, it is assessed that the proposed works would be in compliance with the general heritage provisions outlined in Part 4 of the DCP.

Heritage Consideration	Discussion
<i>Will the proposed works result in adverse heritage impact? If so, how will this be avoided, minimised or mitigated?</i>	The study area does not contain any listed heritage curtilages, and would have little to no adverse physical heritage impacts. Furthermore, the proposed development would have little to no adverse visual impacts on heritage items in its vicinity, as it would not cause substantial overshadowing or reduce the visibility of the 'War memorial and street trees' heritage item.

Design consideration questions for specific types of work that are relevant to the proposal are addressed according to Heritage NSW guidelines¹⁹ in Table 4 below. Though the *Guidelines for preparing a statement of heritage impact* includes a list of specific considerations for proposed works adjacent to a heritage item, it does not include an equivalent list for proposed work in the vicinity of heritage items. Table 4 contains question that have been slightly modified to suit the current project and heritage context.

Table 4. Considerations for specific types of work

Development	Discussion
Works in the vicinity of a heritage item or within the heritage conservation area (listed on an LEP)	
<i>Will the proposed works affect the heritage significance of the heritage item in the vicinity or the heritage conservation area?</i>	The proposed development would not cause considerable overshadowing of the 'War memorial and street trees' heritage item, and would not reduce its visibility in the Broadway streetscape. The proposed development would therefore have little to no adverse visual impact on the aesthetic or social significance of the heritage item in its vicinity.
<i>Will the proposed works affect views to, and from, the heritage item? If yes, how will the impact be mitigated?</i>	The proposed development would not obstruct the visibility of the 'War memorial and street trees' item, as there are already a number of extant buildings that block sightlines between the study area and the heritage item at ground level. The proposed development would have little to no adverse visual impact on the heritage item in this regard.
<i>Will the proposed works impact on the integrity or the streetscape of the heritage conservation area?</i>	The proposed works are not taking place in a heritage conservation area, and although they would alter the appearance of the extant streetscape, they would not affect significant fabric belonging to a listed heritage item. There would be little to no adverse physical and visual heritage impacts as a result of the proposed works.

¹⁹ Heritage NSW, *Guidelines for preparing a Statement of Heritage Impact*, 2023

Assessment against DCP policies

Chapter 4.4, of the Canterbury-Bankstown DCP provides the following development controls pertaining to developments in the vicinity of heritage items. Table 5 below outlines the policy details.

Table 5. Assessment of proposal against DCP policies (Source: *Canterbury-Bankstown DCP 2023*)

Policy #	Are works consistent with DCP policy? (Yes/No?)	Comments
1.1 The design of development must:		
a) <i>Respond to the setting, setbacks, form, scale, and style of nearby places of heritage significance</i>	Yes	The proposed development would not obstruct the visibility of the 'War memorial and street trees' heritage item in the vicinity of the study area, as the extant developments fronting on Dudley Street and Broadway already obstruct sightlines between the study area and the heritage item. The development, when complete, would not exceed the allowable height under the proposed draft planning controls for the site of part of the proposed Punchbowl TOD amendments.
b) <i>maintain significant views to and from the place of heritage significance;</i>	Yes	The proposed development would not encroach on significant views to and from the 'War memorial and street trees' heritage item.
c) <i>ensure adequate setbacks from the site of the place of heritage significance to retain its visual setting;</i>	Yes	The proposed development would be constructed 115 metres from the 'War memorial and street trees' heritage item, and would be located on a different street than that of the heritage item. Though visible to the heritage item, the proposed development would not be intrusive in its visual setting
d) <i>retain original or significant landscape features that are associated with the place of heritage significance or that contribute to its setting;</i>	Yes	The proposed works would not affect or alter significant landscape features associated with the 'War memorial and street trees' heritage item.
e) <i>use materials, finishes and colours selected to avoid</i>	Yes	The proposed development would primarily make use of brick finishes with masonry accents (Figure 22). These types of materials

Policy #	Are works consistent with DCP policy? (Yes/No?)	Comments
1.1 The design of development must:		
<i>strong contrast with the place of heritage significance in order to retain its visual importance or significance.</i>		(brick in particular) would have been prevalent in construction in the Punchbowl area when the 'War Memorial and Street Trees' heritage item was established in 1919. In using the proposed materials as part of the façade, the proposed development echoes construction methods that are familiar to the item, and would not cause a strong contrast with its heritage significance.

Conclusion

This short-form SoHI has come to the following conclusions:

There are **no** listed heritage items within the study area, however there is **one** heritage item of local significance in its vicinity listed on the Canterbury-Bankstown LEP 2023:

- 'War memorial and street trees', Broadway (between The Boulevarde and Canterbury Road (Broadway)), Punchbowl, LEP no. I222

Based on the proposed development drawings for The Boulevarde, Punchbowl, Affordable Housing project which were issued on 29 August 2025, the proposed works would result in the following heritage impacts:

- There would be **little to no adverse** visual and physical impacts on the heritage significance of the listed 'War memorial and street trees' item in the vicinity of the study area.
- There would be **little to no adverse** visual and physical impacts on the heritage significance of the proposed 'Inter-War church 'Punchbowl Uniting Church'' and 'Inter-War houses' LEP items in the vicinity of the study area.

Per the Historic Heritage Constraints Assessment prepared Artefact in May 2025 (attached below as Appendix A), the study area has **nil-low** potential to contain significant historical archaeological remains.

Approval pathway

The project is being undertaken as part of a SSD Application (SSD-83256463) for the proposed construction of a residential flat building for the purposes of affordable housing in the study area at 150 The Boulevarde and 34 Dudley St in Punchbowl, NSW. This short-form SoHI has been prepared to satisfy the reporting requirements outlined in the SEARs for the project which were issued on 12 May 2025.

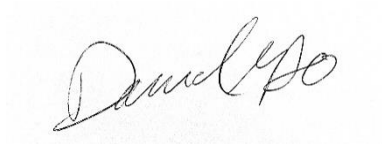
Recommendations and mitigation measures

The following recommendations and mitigation measures are provided in order to minimise the possibility of adverse impacts to the heritage items in the vicinity of the study area:

- If any inadvertent damage occurs to heritage items located in the vicinity of the study area due to the proposed works (including the locally listed 'War memorial and street trees', LEP no. I222), the damage must be reported immediately to the Project Manager and the relevant heritage specialists. Damage is to be made good in accordance with specialist heritage advice.
- An unexpected heritage finds procedure should be prepared and incorporated into the Construction Environment Management Plan (CEMP) to be implemented through the works.
- A brief heritage induction should be prepared to advise contractors of what to do in the event that an unexpected heritage find is encountered. The heritage induction should be delivered as part of the project environmental induction given at project commencement.

Please do not hesitate to contact us if you have any questions.

Kind Regards,



Daniel Dompierre-Outridge
Heritage Consultant

ARTEFACT HERITAGE AND ENVIRONMENT

Telephone: 61 2 9518 8411

Email: Daniel.dompierre@artefact.net.au

Address: Suite 56, Jones Bay Wharf, 26-32 Pirrama Rd. Pyrmont NSW 2009

Web: www.artefact.net.au

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Appendix A

(150 The Boulevarde & 34 Dudley Street, Punchbowl Historic Heritage Constraints Assessment, prepared by
Artefact May 2025 inserted here in PDF copy)