

Our ref: HMS ID 13074

Tia Mills
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Department of Planning, Housing and Infrastructure
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Letter uploaded to the Major Projects Planning Portal

Advice on Amendment Report – State Significant Development

Proposal: Gregory Place Build to Rent

Major Project reference: SSD-31179510

Received: 17 December 2025

Dear Tia,

Thank you for your referral seeking advice on the above State Significant Development (SSD) amendment proposal.

In preparing this advice Heritage NSW has reviewed the following documents:

- Relevant sections of *Amendment Report 2A Gregory Place, Harris Park* - prepared by Pacific Planning, dated December 2025.
- *2A Gregory Place Harris Park NSW Aboriginal Cultural Heritage Assessment Amendment Report* – prepared by Dominic Steele Consulting Archaeology, dated December 2025.

Following the review of the above documents, Heritage NSW requests additional information to inform its advice to the Department on whether the Aboriginal Cultural Heritage Assessment Report (ACHAR) adequately addresses the Secretary's Environmental Assessment Requirements (SEARs) for the project, including the associated recommendations for the management of Aboriginal cultural heritage.

Additional information is required in relation to the following matters detailed in **Attachment A**.

Please note that the above comments relate only to Aboriginal cultural heritage regulation matters. If you have any questions about this correspondence, please contact Sarah McGuinness, Senior Assessments Officer at Heritage NSW on (02) 9873 8500 or heritagemailbox@environment.nsw.gov.au

Yours sincerely,

James Cole

James Cole
A/Practice Lead - Major Projects
Heritage NSW
Department of Climate Change, Energy, the Environment and Water
As Delegate under *National Parks and Wildlife Act 1974*
16 January 2026

Attachment A – Detailed Aboriginal Cultural Heritage Advice

Aboriginal Community Consultation

1. Heritage NSW notes that the last recorded consultation with the Registered Aboriginal Parties (RAPs) was in 2022. Heritage NSW requires that consultation with RAPs is continuous and under our policy and guidelines, breaks in consultation of over six months may not constitute continuous consultation. Please outline how continuous consultation has been maintained with RAPs throughout this assessment.
2. In accordance with the *Aboriginal cultural heritage consultation requirements for proponents 2010* (Consultation Guidelines), please provide all consultation records (including all letters and email correspondence and a consultation log) undertaken for the project.

Archaeological Assessment

3. Please provide an updated Aboriginal Heritage Information Management System (AHIMS) search. AHIMS searches are only valid for a period of 12 months.
4. Heritage NSW understand that the level of subsurface disturbance within the project area is currently not fully understood, and that additional detailed contamination assessment is recommended to inform an updated assessment of archaeological potential. To inform the management of Aboriginal cultural heritage within the project area however, a preliminary assessment of archaeological potential is required, as informed by current understanding of disturbance and contamination.

Accordingly, please update the ACHAR to include a map of areas of Potential Archaeological Deposit (PAD). The preliminary archaeological assessment should be updated following completion of additional contamination assessment and testing, with any PAD registered on AHIMS.

5. Please update the ACHAR to outline mitigation measures for managing Aboriginal cultural heritage within the project area, based on the findings of the additional contamination assessment. The ACHAR should specify mitigation measures for areas with minimal or no disturbance and contamination, as well as tailored mitigation for areas identified as contaminated.

Aboriginal Cultural Heritage Management Plan

6. Please update the ACHAR to include a recommendation for preparation of an Aboriginal Cultural Heritage Management Plan (ACHMP) to guide the management of Aboriginal cultural heritage within the project area, including any future archaeological investigations.