

Our ref: HMS ID 13073

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Advice on Amendment Report & Response to Submissions – 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 dated 17 December 2025 inviting the Heritage Council of NSW to provide advice on the above State Significant Development (SSD) amendment report and response to submissions (RtS).

The following documents were considered in our assessment:

- Relevant parts of *Amendment report- State significant development Affordable housing and build to rent Concept development application 2A Gregory Place, Harris Park*, Pacific Planning, December 2025, including the following appendices.
- Appendix A: *Response to submission report*, Pacific Planning, August 2025;
- Appendix C: *Design Amendment Report for SSD-311795510*, Pacific Community Housing, Pacific Planning, GBA Heritage, Yerrabingin, Tzannes, 01 December 2025;
- Appendix F: *Visual Impact Assessment*, Tzannes, 01 December 2025;
- Appendix Q: *Updated Statement of Heritage Impact*, GBA Heritage, 31/07/2027; and
- Appendix U: *Historical Archaeological Heritage Impact Assessment Amendment Report*, Dominic Steele Consulting Archaeology, 4 December 2025 (HAHIAA).

We note that separate architectural plans were not included as part of the amendment/RtS documentation.

As delegate of the Heritage Council of NSW, we provide the following advice:

- The SSD amendment and RtS was considered by the Heritage Council's Approvals Committee on 30 September 2025. The committee found the amended design to be a substantial improvement on the EIS scheme and a positive response to previous Heritage Council concerns. The committee passed resolution 2025-43 in response to the SSD amendment and RtS – please refer to **Attachment A**.
- Should the SSD proceed to the developed design phase it is recommended that the following issues be addressed.
 - The boundary fencing between the SSD site and Hambledon Cottage, including provision for any access points between the two properties, should be developed in consultation with Hambledon Cottage management. Heritage NSW considers that the provision of fencing along the boundary would clearly delineate the property boundary and would assist in management of both properties. We would be happy to advise further if requested.
 - A heritage interpretation plan (HIP) should be prepared at an early stage in to inform the detailed design. The HIP should be submitted as part of any future development application for detailed design.
 - Later design phases should carefully consider visual impacts on Hambledon Cottage and Experiment Farm. It is recommended that the design should be contemporary in character but sympathetic in colour and materiality and should not detract from or visually overwhelm the SHR listed items in the vicinity. Detailed design should also consider breaking down of visual mass as noted in Item 9 of the Approvals Committee resolutions (Attachment A);
- The HAHIAA assesses that the SSD site is not expected to contain substantially intact archaeological remains that meet the threshold of significance, but recommends that archaeological monitoring should be undertaken. Please refer to **Attachment B** for further advice in this regard.

As local heritage items and conservation areas are in the vicinity, advice should be sought from the relevant local council.

If you have any questions about this correspondence, please contact Anna Simanowsky, Senior Assessments Officer at Heritage NSW on (02) 9873 8500 or heritagemailbox@environment.nsw.gov.au

Yours sincerely

Corey O'Driscoll

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A/Manager

Major Projects

Heritage NSW

Department of Climate Change, Energy, the Environment and Water

As Delegate of the Heritage Council of NSW

16 January 2026

Attachment A - Gregory Place Build to Rent (SSD-31179510)

Heritage Council Approvals Committee – 30 September 2025

Resolution 2025-43

The Approvals Committee resolved to:

1. **Note** the draft Response to Submissions report prepared by Pacific Planning.
2. **Note** that the current scheme has responded to a number of concerns previously raised by the Approvals Committee and potential impacts on the context, setting and visual connections between Hambledon Cottage, Experiment Farm Cottage, and Our Lady of Lebanon Co-Cathedral have been reduced.
3. **Note** the material reduction in massing and scale of the building envelopes as part of the proponent's response to submissions, including the reduction from approximately 483 to 320 dwellings.
4. **Note** the importance of continuity of design excellence through to the construction.
5. **Support** the Connection with Country and landscape design and recommend that it inform the wider public domain
6. **Support** the proposed 30-metre-wide public park connection as a minimum, which will provide a visual link between Hambledon Cottage and Our Lady of Lebanon CoCathedral.
7. **Support** the reduction in Building C's footprint and height from 7–8 storeys to 4–6 storeys. This adjustment adds additional parkland in the vicinity of Experiment Farm Cottage and improves view lines.
8. **Support** the proposed current scheme with a maximum of 2-storey heights for buildings in the immediate vicinity of the Hambledon Cottage.
9. **Consider** in later design phases breaking up the visual mass, particularly on the northern elevation.

Attachment B - Gregory Place Build to Rent (SSD-31179510)

Recommendations – Historical Archaeology

Archaeological Work Methods Statement

1. An Archaeological Work Method Statement (AWMS) is to be completed for the project in accordance with the guideline *Archaeological Assessments* (Heritage Office and DUAP 1996) to inform and guide archaeological monitoring. The AWMS must:
 - a. identify the potential archaeological resource on site, and how it will be impacted by the proposed works.
 - b. identify research questions to guide the archaeological program.
 - c. propose a methodology for archaeological monitoring on site.
 - d. provide a methodology for post-excavation analysis and reporting.
 - e. provide an Unexpected Finds Procedure for the proposed works. This should include a provision for a stop-works procedure and notification to Heritage NSW, should substantially intact relics, or potential relics be identified.
 - f. Include a requirement for provision of an Archaeological Research Design and Excavation Methodology (ARDEM) if archaeological testing and/or open-area salvage excavation is recommended as mitigation based on the results of the monitoring. The ARDEM should detail the proposed excavations and methodology and should be developed in consultation with Heritage NSW.
2. The AWMS is to be provided to the Secretary of the Department of Planning, Housing and Infrastructure for approval in consultation with Heritage NSW.
3. A Final Excavation Report is to be prepared and provided to Heritage NSW within 12 months of the completion of archaeological investigations for accession to the Heritage Library.

Nominate an Excavation Director

4. A suitably qualified and experienced Excavation Director should be nominated for the archaeological monitoring works. The nominated Excavation Director is to meet the requirements of *Criteria for Assessing Excavation Directors* (Heritage Council of NSW 2019). The ARDEM and nominated Excavation Director should be submitted to Heritage NSW for approval prior to the commencement of archaeological works.