

Our ref: HMS ID 12088

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Advice on Environmental Impact Statement – State Significant Development

Proposal: Berrima Hotel/Berrima Correctional Centre

Major Project reference: SSD-66876472

Received: 13 October 2025

Dear Mr Shakir,

Thank you for your referral dated 13 October 2025 inviting the Heritage Council of NSW to provide advice on the Environmental Impact Statement (EIS) for the above State Significant Development (SSD) proposal.

The proposed SSD affects the State Heritage Register (SHR) item Berrima Correctional Centre (SHR no. 00807).

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

- Relevant parts of *Environmental Impact Statement (SSD 66876472)*, Sutherland & Associates Planning, September 2025, including the following appendices:
- Appendix 5: Architectural drawings titled 'Adaptive Reuse of the former Berrima Gaol', Turner, 8/09/2025;
- Appendix 6: *Architectural Design Report*, Turner, September 2025;
- Appendix 7: Landscape plans, JMD Design, September 2025;
- Appendix 8: *Landscape Architecture Report*, JMD Design, September 2025;
- Appendix 14: *Visual Impact Assessment for a Proposed Adaptive Reuse of the former Berrima Gaol*, Ethos Urban, 22 August 2025;

- Appendix 22: *Acoustic Report for a Proposed Adaptive Reuse of the former Berrima Gaol*, Renzo Tonin & Associates, 15/08/2025;
- Appendix 32: *Heritage Impact Statement*, Urbis, 25/08/2025;
- Appendix 33: *Conservation Management Plan*, Urbis, 15/05/2024;
- Appendix 34: *Baseline Historical Archaeological Assessment*, Austral Archaeology, 14/08/2025.

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

1. On 2 September 2025 the applicant presented the SSD proposal to the Heritage Council of NSW Approvals Committee. The Approvals Committee passed Resolution 2025-37 in regard to the SSD proposal – please refer to Attachment A.
2. We recommend that the applicant be required to address the comments included in the Approvals Council's resolutions.
3. We assess that additional information is required to meet the Secretary's Environmental Assessment Requirements (SEARs) and to allow us to complete our assessment. We recommend that the applicant be required to provide the additional information and address issues as outlined in Attachment B.

As the site contains a local heritage item, and other local items 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,

Alison Lamond

Alison Lamond
 Manager
 Major Projects
 Heritage NSW
 Department of Climate Change, Energy, the Environment and Water
As Delegate of the Heritage Council of NSW
 4 November 2025

Heritage Council Approvals Committee resolution 2057-37

The Approvals Committee resolves to:

- 1. Support in principle the adaptive reuse of the former Berima Gaol as a hotel.*
- 2. Support the incorporation of Connecting with Country principles in developing the proposal.*
- 3. Request further justification for the need for a new opening in the eastern (front) gaol wall, including:*
 - A need for activation*
 - The proximity of the existing front door*
 - Functional requirement for an additional exit*
- 4. Request further information on the proposed use of Governor's and Deputy Governor's residences*
- 5. Support the use of native and exotic planting in enhancing the character of the landscape and caution against the use of over-rustic stonework detailing within close proximity of historic walls.*
- 6. Consider a less dominant form for the porte cochere.*
- 7. Ensure that archaeological conservation and interpretation opportunities are maximised.*
- 8. Support in principle the form and layout of the proposed new buildings containing hotel units at the rear of the former gaol near the Wingecarribee River escarpment, noting the State Design Review Panel's comments on further design resolution.*
- 9. Support the proposed integration of new design elements within the gaol walls, including new glazed roofing elements.*

Additional information requested and issues to be addressed

Archaeology

The *Baseline Historical Archaeological Assessment* does not fully address SEARs item 20 as it does not “... consider the impacts from the proposal on the potential archaeological resource”. The report presents an overview of archaeological potential only and does not outline the proposed redevelopment, nor consider the potential impact of the works. In addition, no assessment of maritime archaeology has been undertaken.

We recommend that the following be undertaken.

1. Update the *Baseline Historical Archaeological Assessment* (BHAA)

The BHAA should be updated to:

- a) reflect the proposed planning pathway of the project as a State Significant Development (SSD), with consideration of the relevant legislative requirements of this pathway.
- b) include a detailed impact assessment in consideration of the identified archaeological potential and all proposed works. The impact assessment should also consider indirect impacts including vibration and compaction.

The impact assessment should be informed by:

- i. A Ground Penetrating Radar (GPR) survey, as recommended in the BHAA.
 - ii. Results of test excavation (see item 2).
- c) Following update of the assessment in consideration of project impacts, clear and detailed mitigation measures should be developed relevant to the distinct areas of archaeological sensitivity. Specific mitigation measures for known or suspected burials should also be developed.

2. Undertake test excavations

Test excavation should be undertaken prior to project approval to inform the EIS. The results of the test excavations should be used to inform decision-making and identify appropriate conservation outcomes and mitigation measures commensurate with the assessed significance of the identified archaeological resource. Heritage NSW advises that the current approach for the management of any identified State significant archaeology and/or burials is preservation and conservation in situ as a preferred heritage outcome.

3. Prepare an Archaeological Research Design and Excavation Methodology (ARDEM)

An ARDEM should be prepared in accordance with the guideline *Archaeological Assessments* (Heritage Office and DUAP 1996) to inform and guide archaeological excavations, which includes test excavations. The ARDEM should:

- a) Identify research questions to guide the archaeological program
- b) Propose a methodology for archaeological investigations on site, including a sampling strategy for the test excavations as appropriate.

- c) Propose a methodology for excavation and management of known or suspected burials, in accordance with the requirements of the *Coroners Act 2009*.
- d) Consider the inclusion of an artefact discard policy and procedure.
- e) Include clear triggers and hold points for the identification of substantially intact (and, if present, State significant) archaeological deposits/relics and/or burials. The hold points should require, and allow for, consideration of redesign to avoid impacts. Heritage NSW would appreciate an opportunity to comment on the proposed management approach decided upon by the proponent.
- f) Provide a methodology for post-excavation analysis and reporting.
- g) Include provision for an addendum to the ARDEM if open-area salvage excavation is recommended as mitigation based on the results of the testing. The Addendum should detail the proposed salvage excavations and methodology and should be developed in consultation with Heritage NSW.

The ARDEM should be prepared following updates to the BHAA.

4. Nominate an Excavation Director

A suitably qualified and experienced Excavation Director should be nominated for test excavations. 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 test excavations.

5. Undertake and assessment of the potential impacts on maritime archaeology

An assessment of maritime archaeology and the potential impacts of the proposed works on such resource should be prepared by a qualified maritime archaeologist.

Should impacts to maritime archaeology be identified, appropriate mitigation measures should be developed.

Visual Impact Assessment

- 6. The *Visual Impact Assessment* does not assess visual impacts from viewpoints along the Wingecarribee River. We recommend visual impact assessments be undertaken from key viewpoints along the river, including viewpoints from any State heritage items within the view catchment of the SSD.

Proposed arbor

- 7. The landscape drawings show an arbor is proposed to be erected within the gaol's front garden close to the proposed new opening in the gaol wall. Please provide additional details of the arbor to illustrate its design and its visual permeability, noting that the new opening in the gaol wall is intended to increase permeability into the site. Please assess the heritage impacts of the proposed arbor.

Proposed glasshouse

8. The glass house will be a new structure outside of the gaol walls. Please provide additional details of the proposed glasshouse and its scale in relation to existing adjacent structures. Please assess the heritage impact of the glasshouse.

Guard's tower internal changes

9. It is noted that the upper floors and access stairs are to be demolished from within the guard's tower. As views from the top floor of the tower were key to its purpose at the gaol please justify the removal of access to the uppermost floor and the views from its windows, and assess the associated heritage impacts.

Construction within the gaol walls

10. Please provide information on the methodology proposed for construction within the gaol walls and whether additional openings in the walls would be required for vehicular access and/or to facilitate construction.
11. Please provide information on how it is proposed that the gaol walls would be protected from damage during construction including the excavation of the lift shaft and tunnel to the carpark.

Interpretation Plan

12. Prepare an interpretation plan. It is noted that interpretation has been integrated into parts of the design but no interpretation plan has been submitted with the EIS. Noting that CMP Policy 150 states that '*A Heritage Interpretation Strategy and /or Plan should be prepared for Berrima Gaol in tandem with any major changes to the site including adaptive reuse*', we consider that an interpretation plan should be prepared for the SSD.