

Our Ref: HTB03.9

6 June 2025

Re: Letter of Advice Regarding SEARs Reporting – Environmental Heritage

This *Letter of Advice* has been prepared by Travers bushfire & ecology (TBE) on behalf of HT Building Pty Ltd for a combined Concept Plan approval and Stage 1 detailed works for a new multi-denominational cemetery at 430-490 Douglas Park Drive, Douglas Park (Douglas Park Memorial Park – Concept Plan and Stage 1).

SEARs Reporting

Item	Issues and Assessment Requirements – Concept Proposal	SEARs Requirement	Relevant Section of Report
23	Environmental Heritage Where there is potential for direct or indirect impacts as a result of the concept development on the heritage significance of items of environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (if potential impacts to archaeological resources are identified), prepared in accordance with the relevant guidelines, which assesses any impacts and outlines measures to ensure they are minimised and mitigated.	• Statement of Heritage Impact	Letter of Advice
		• Archaeological Assessment	Letter of Advice
Item	Issues and Assessment Requirements – Stage 1	SEARs Requirement	Relevant Section of Report
21	Environmental Heritage Where there is potential for direct or indirect impacts on the heritage significance of environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (if potential impacts to archaeological resources are identified), prepared in accordance with the relevant guidelines, which assesses any impacts and outlines	• Statement of Heritage Impact	Letter of Advice
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	measures to ensure they are minimised and mitigated.		
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The site is located at 430-490 Douglas Park Drive, Douglas Park within the Wollondilly Local Government Area (LGA). The site is irregular in shape with a total size of 16,7940m². It is legally described as Lot 2 in DP 250359. The site is mostly vacant with scattered vegetation and a single, residential dwelling with driveway accessible from Douglas Park Drive. The site comprises two street frontages, to the east is Mitchell Place and to the west is Douglas Park Drive.

This letter accompanies a State Significant Development Application that seeks approval for a combined Concept Plan approval and Stage 1 detailed works for a new multi-denominational cemetery.

Concept approval is sought for the use and operation of the site as a cemetery with a maximum, staged capacity of up to 37,107 burial plots including a crematorium, chapel, administration building, vaults, remembrance sanctuaries, general site layout and all associated groundworks, roads, parking, pathways, landscaping and ancillary buildings.

The Stage 1 works comprise the following:

- All preparatory site works including vegetation protection, enhancement and removal, demolition of existing structures, bulk excavation for burial zones, general ground works and utility service augmentation;
- Vehicular access / egress from Douglas Park Drive with separate vehicular egress only to Mitchell Place;
- Construction of internal roads, pathways and parking areas for approximately 118 car parking spaces inclusive of 1 hearse car parking space;
- Perimeter memorial pedestrian pathway with remembrance sanctuaries;
- Burial zones with a maximum capacity of 15,447 comprising shallow, single and triple layered burial plots;
- Construction of single storey chapel, single storey administration building and single storey storage shed and garage;
- Site landscaping, fencing, lighting and entry signage; and
- The cemetery operating hours, including public access, will be between the hours of 6:00am and 6:00pm, 7 days a week. The opening hours of the Chapel and Administration Building (including café) will be between 8:00am and 5:00pm, 7 days a week.
- The burial zone preparation works within Stage 1 will be carried out sequentially within each burial zone and will be based on the demand for burial plots.

For a detailed project description refer to the Environmental Impact Statement prepared by Ethos Urban.

Agency Advice: Heritage NSW, DECCW

Heritage NSW Requirement	Relevant Section of Report
Environmental Heritage The subject site is not listed on the State Heritage Register (SHR), nor is it in the immediate vicinity of any SHR items. Further, the site does not contain any known historical archaeological relics. Therefore, no heritage comments are required. The Department does not need to refer subsequent stages of this proposal to the Heritage Council of NSW.	Letter of Advice

The Department of Planning, Housing and Infrastructure, in a referral dated 6 March 2024 invited SEARs input from the Heritage Council of NSW on the Secretary's Environmental Assessment Requirements (SEARS) for the Douglas Park Cemetery - Concept Plan and Stage 1 SSD-68287712.

Heritage NSW responded in a letter dated 12 March 2024 and titled *Request for Secretary's Environmental Assessment Requirements (SEARS) for the Douglas Park Cemetery - Concept Plan and Stage 1 SSD-68287712*:

"Thank you for your referral dated 6 March 2024 inviting SEARS input from the Heritage Council of NSW on the above State Significant Development proposal.

The subject site is not listed on the State Heritage Register (SHR), nor is it in the immediate vicinity of any SHR items. Further, the site does not contain any known historical archaeological relics. Therefore, no heritage comments are required. The Department does not need to refer subsequent stages of this proposal to the Heritage Council of NSW.

As other local items are in the vicinity, you should seek advice from the relevant local council."

The letter of advice from Heritage NSW and based on input from the Heritage Council of NSW advised that no further studies were required to undertake in relation to the Environmental Heritage SEARs # 23 that requested the preparation of a *Statement of Heritage Impact* or a *Historical Archaeological Assessment*.

With regard to the "other local items" identified in the Heritage NSW response, this refers to two items listed on the *Wollondilly Local Environmental Plan 2011* and State Heritage Inventory as items of built heritage listed as having local heritage significance:

- LEP #I70 "Stone Cottages" at 380 Douglas Park Drive, Douglas Park is located 730m east of the southeast boundary of the study area; and
- LEP #I71 "St Mary's Towers" at 415 Douglas Park Drive, Douglas Park is located 480m south of the southern boundary of the study area.

Both items of built heritage are a considerable distance, and importantly there are no view corridors to either of these two items from the study area. Based on the distance and the nature of the topography between the built heritage items and the study area, the construction

of the proposed new multi-denominational cemetery will have no impacts on the two items listed on the *Wollondilly Local Environmental Plan 2011* and State Heritage Inventory.

Accordingly, this letter detailing the response to Heritage NSW has been prepared in lieu of these two technical reports.

If you require any further information, or have any questions, please do not hesitate to the contact the undersigned on (02) 4340 5331 or at jczastka@traverseecology.com.au.

Yours faithfully



Jakub Czastka
Principal Archaeologist - **Travers bushfire & ecology**

Consultant Declaration

PROJECT DETAILS	
PROJECT NAME	
Application number	SSD- 68287712
Address of subject land	430-490 Douglas Park Drive, Douglas Park
Lot / DP	Lot 2 in DP 250359.
APPLICANT DETAILS	
Applicant name	Benima Pty Ltd
Applicant address	L2, 60 York Street, Sydney NSW 2000
REPORT DETAILS	
Name of report this declaration relates	Letter of Advice Regarding SEARs Reporting - Environmental Heritage
Report reference no.	HTB03.9
Report date	28 May 2025
Company name (inc. ABN / ACN)	ABN 85 624 419 870
Author name	Jakub Czastka
Author qualifications	BA (Honours) Archaeology
Author address	52 the Avenue, Kariong, NSW
DECLARATION BY CONSULTANT	
Name	Jakub Czastka
Registration no.	n/a
Organisation registered with	Heritage NSW
Declaration	The undersigned declares that <i>Letter of Advice SEARs Reporting - Environmental Heritage</i>: - has been prepared in accordance with the following policy, guidelines, or legislative requirements: - The Burra Charter: Australia ICOMOS Charter for Places of Cultural Significance, 2013 (The Burra Charter). - Heritage NSW, State of NSW and Department of Planning and Environment publications. 2002. <i>Statements of Heritage Impact</i>. - State of NSW and Department of Planning and Environment. 2023. <i>Guidelines for preparing a statement of heritage impact, 2023</i>. - NSW Heritage Office. 2006. <i>Historical Archaeology Code of Practice</i>. NSW Heritage Office, NSW Department of Planning. - NSW Heritage Office. 2008. <i>Levels of Heritage Significance</i>. NSW Heritage Office, Sydney. - NSW Heritage Branch. 2009. <i>Assessing Significance for Historical Archaeological Sites and 'Relics'</i>. NSW Heritage Branch, NSW Department of Planning. - contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the <i>Letter of Advice SEARs Reporting - Environmental Heritage</i> relates; - does not contain information that is false or misleading; - identifies and addresses the relevant Planning Secretary's environmental assessment requirements (SEARs) for the project;

PROJECT DETAILS

- identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments to which the *Letter of Advice SEARs Reporting - Environmental Heritage* relates;
- contains a consolidated summary of the proposed or necessary mitigation measures

Signature



Date

28 May 2025

SEARs Reporting

Item	SEARs Requirement - – Concept Proposal	Relevant Section of Report
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Item	Issues and Assessment Requirements –Stage 1	Relevant Section of Report
21	Environmental Heritage • Where there is potential for direct or indirect impacts on the heritage significance of environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (if potential impacts to archaeological resources are identified), prepared in accordance with the relevant guidelines, which assesses any impacts and outlines measures to ensure they are minimised and mitigated. • Statement of Heritage Impact • Archaeological Assessment	Letter of Advice