

8 July 2024

Attention: Melanie James  
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**PROPOSED LANDCOM - BUILT TO RENT DEVELOPMENT AT 53, 57 BOLONG ROAD AND 4  
BEINDA STREET, BOMADERRY – DA 2024/1326**

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**HERITAGE LETTER**

Dear Melanie,

It is noted that a development application for a residential development (Built to Rent) by Landcom at 4 Beinda Street, Bomaderry has been submitted to Shoalhaven Council for assessment under DA 2024/1326. This letter has been prepared to address the submission received from Max Cochrane and the heritage impact assessment prepared by Louise Thom Heritage dated June 2024 pertaining to the heritage impacts of the proposed development on the heritage significance of 'Flawcraig', currently known as 'Greenleaves' located at 59 Bolong Street, Bomaderry.

**1. Heritage impact of the proposed development along the southern boundary of the site**

- Heritage 21 notes from the submissions received and the heritage impact statement prepared by Louise Thom that the main point of contention is the 6m setback from the southern boundary. It has been noted that this 6m setback would cause privacy impacts on the heritage item located adjacent to the proposed site of development. The architectural drawings have been revised and new privacy screening panels have been introduced to multiple south facing apartments to ensure that the proposed development does not negatively impact the privacy of the heritage item.
- The 1996 '*Heritage Curtilages*' document prepared by the then Heritage Office of the Department of Urban Affairs and Planning (currently known as Heritage NSW), defines the different curtilages that are applicable to heritage items. 'Flawcraig' has a heritage curtilage limited to its lot boundaries. Any development outside of its lot boundaries would have minimal impact on its heritage significance.

The proposed development does not encroach on the lot boundaries and would be setback 6m from the southern boundary to ensure that there are minimal impacts on the heritage significance of the heritage item. Additionally, 'Flawcraig' is sited approximately 15m from its northern boundary and a 6m setback would be introduced along the southern boundary within the proposed site of development. This would ensure that an approximate 21m separation between the heritage item and the new apartment buildings is provided. As such, Heritage 21

believes that there would be appropriate separation between the new development and the heritage item located adjacent to the subject site.

Heritage 21 is also of the opinion that the alteration of the existing setting by the proposed bulk and scale of the new development would have minimal impact on the heritage significance of the item located in the vicinity of the site.

As outlined, in the Louise Thom heritage impact assessment report (pg.22-23), the northern boundary and the landscaping along this boundary of the heritage item is of little significance. Any impacts of the proposed development in terms of bulk and scale would be limited to these areas of little significance. The proposed development would not include any physical intervention and would not be impacting any of the areas of high or moderate heritage significance.

- The proposed mitigation measures outlined in the submission suggest that the southern setback of 6m should be increased to 8m and the new development should be moved further north. However, these changes would have major negative impacts on the significant trees located along the northern boundary, along Beinda Street. Reducing the northern setback within the proposed development would impact the root zones of the large mature trees along the northern boundary and would lead to their removal. The removal of these trees would be significant negative impact and would remove the landscape buffer that currently is provided for the new development.
- The proposed mitigation measures in the submissions outline that a solid 3-4m high boundary wall should be constructed along the southern boundary. However, Heritage 21 is of the opinion that this solid boundary wall would have visual impacts on the existing heritage dwelling which has open landscape setting with a timber fence that is of a low height. We believe, introducing a solid boundary wall of 4m for privacy purposes would have a visual impact on the heritage item.

## **2. Heritage impact of the proposed development from the north-east along Bolong Road**

The following images taken by Heritage 21 during the site visit undertaken on 23 February 2024, outline the views from the north-east along Bolong Road towards 'Flawcraig'. The subject dwelling is setback from the eastern boundary along Bolong Road and consists of dense vegetation and landscaping which obscure views to the heritage item from the north-east along Bolong Road. The below images indicate that there are limited views to the heritage item from the north-east along Bolong Road. The proposed introduction of the new apartment buildings as such would have minimal impacts in the opinion of Heritage 21 on the heritage item. The new development would not obstruct these views to the heritage item.



**Figure 1.** View to the heritage item from the north-east along Bolong Road indicated by the red arrow. Note the heritage item is set behind the mature trees and the direct views to the house are obscured as it is setback from the street.



**Figure 2.** View to the heritage item from the north-east along Bolong Road indicated by the red arrow. Note the heritage item is set behind the mature trees and the direct views to the house are obscured as it is setback from the street.

### **3. Heritage significance of the existing dwelling located at 53 Bolong Road, Bomaderry**

A heritage significance assessment has been undertaken by Heritage 21 in Section 4.2 of the Statement of Heritage Impact (SOHI) report submitted along with the development application and the statement of significance summarises that other than the historical development of the site for residential purposes, the existing dwelling located at 53 Bolong Street does not fulfill any of the criteria against which heritage significance can be assessed. The images included in Section 3.4 of the SOHI also indicate the poor condition of the existing dwelling and how it has been significantly altered, leading to the loss of its original fabric. As such, the removal of the existing dwelling at 53 Bolong Road, Bomaderry would not lead to the removal of any heritage significant fabric.

Please do not hesitate to contact the below if any further information is required for this application.

**Ankita Powale**  
**Senior Heritage Consultant**

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Master of Urbanism (Heritage Conservation)