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Mr Stuart McIntosh
Planning Officer
Sydney Region West
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

By email: stuart.mcintosh@planning.nsw.gov.au

Dear Mr McIntosh

Application for Site Compatibility Certificate at 2A Gregory Place, Harris Park

Thank you for referring the abovementioned application for a Site Compatibility Certificate to the Heritage Division, Office of Environment and Heritage for comment. The proposal seeks to construct a residential development of between 4 to 35 stories consisting of 1,300 dwellings, with a component for affordable housing.

It is understood that the application for a Site Compatibility Certificate (SCC) is made under Division 5 of *State Environmental Planning Policy (Affordable Rental Accommodation) 2009* (Affordable Housing SEPP). It is understood that the SCC will facilitate the submission and consideration of a future Development Application for residential development on land that is currently zoned IN1 – General Industrial.

The former industrial buildings occupying the subject site are not identified as heritage items and are not located within a conservation area. However, the site is adjacent to State Heritage Register items *Hambledon Cottage, Grounds and Archaeology* (SHR no. 01888) located to the north and *Experiment Farm Cottage* (SHR no. 00768) located to the west. It is also noted that *Elizabeth Farm* (SHR no. 00001) is in the vicinity of the site. It is also noted that the site is adjacent to the locally listed Experiment Farm Conservation Area.

Having reviewed the relevant documentation accompanying the proposal; the current proposal is not supported and the following comments are provided:

1. The 'Heritage Assessment and Curtilage Study' by NBRSP+Partners, dated November 2016 (Heritage Report) is considered inadequate to support the application for a Site Compatibility Certificate. The following information should be included in the Heritage assessment report:
 - a. identification of all the heritage items (state and local) and conservation areas located in the vicinity of the site including *Hambledon Cottage, Grounds and Archaeology* (SHR no. 01888), *Experiment Farm Cottage* (SHR no. 00768) *Elizabeth Farm* (SHR no. 00001) and Experiment Farm Conservation Area;
 - b. significance assessment of all heritage items and conservation areas that may be affected by the proposal;
 - c. a history of Experiment Farm Cottage;
 - d. a detailed view and settings analysis to identify significant views and elements that are core the setting; including the association between heritage items

- e. a detailed assessment of the heritage impacts of the proposed design upon the all heritage items identified in 1a; with reference to views, settings and associations between the heritage items.
2. Section 5.1 of the Heritage Report states that:
- a. *“any proposed re-development of the subject site should provide for the enhancement of the visual setting of Hambledon Cottage when viewed from its lot curtilage and from Hassall Street and the open parkland to the north west of the site.”*

The current visual setting of Hambledon Cottage is of open space and low scale development, with the exception of the industrial buildings to the rear at the subject site. It is considered that the height, bulk and scale of the proposed development (two 35 storey towers) is out of context with the predominantly low-scale area. The proposal is unsympathetic to the setting of Hambledon Cottage and its grounds.

3. Section 5.1 also recommends that:
- a. *“no development of the subject site should preclude the recovery in the future of any physical or visual connection between the three Colonial properties and particularly between Elizabeth Farm and Hambledon.”*

Elizabeth Farm and Hambledon Cottage are significant for their associations with the Macarthurs whom were prominent in the 19th century development of the colony. Elizabeth Farm and Hambledon Cottage were also originally part of the Elizabeth Farm Estate. Given the associations between these two places, the recovery of views and provision of view cones is supported. It is noted that current development has obscured all views and that the only views available are from Hambledon Cottage to Elizabeth Farm of tall trees that suggest the presence of the house. Furthermore, the associations between the three colonial properties are currently maintained by the low scale development in the area which is sympathetic to the heritage items. The current planning controls in this area reflect the existing low scale development and the historic significance of the area which comprise a number of individual heritage items and conservation areas.

4. Experiment Farm Cottage directly adjoins the subject site. The cottage is of exceptional cultural significance because of its visual prominence in the surrounding landscape. There has been significant ongoing conservation of Experiment Farm since the 1920s. This included the National Trust purchasing land to the north of the cottage to reinstate views of the Parramatta River and regaining part of its original curtilage. It is considered that the proposal will detract from these conservation efforts, as the towers will dominate significant views out from Experiment Farm Cottage and its grounds.

The applicant has previously advised to consult the Heritage Council of NSW to seek feedback on the proposal. It is recommended that the applicant consults with the Heritage Council as soon as possible.

If you have any questions regarding the above matter please contact Lily Chu, Heritage Officer at the Heritage Division on 9873 8595 or at lily.chu@environment.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rochelle Johnston'.

Rochelle Johnston
Acting Director, Heritage Operations
Heritage Division
Office of Environment & Heritage

29 May 2017