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Cumberland Council
PO BOX 42
MERRYLANDS NSW 2160
Attention: Heidi Bischof
Send via email: Heidi.bischof@cumberland.nsw.gov

Dear Ms Bischof,

RE: Planning proposal to amend Holroyd Local Environmental Plan 2013

Thank you for your email dated 26 August 2016 seeking Heritage Division's comments on the abovementioned works. As delegate of the NSW Heritage Council I make the following comments:

The proposal seeks amendments to Holroyd Local Environmental Plan 2013 to rezone the Bonds Spinning Mills site at Nos. 190 - 220 Dunmore Street, Pendle Hill from IN2 Light Industrial to R4 High Density Residential, B2 Local Centre and RE1 Public Recreation to enable redevelopment of specific components for residential and commercial purposes.

The Heritage Division notes that although there is no State Listed Heritage Items on the subject site, the proposed rezoning and additional height may have an impact on the heritage significance of the locally listed heritage items. There may be some adverse impacts on the surrounding historical character that should be mitigated such as land use changes, changes to the built form and additional shadows on the subject site. Further, it is considered that should additional FSR is to be approved, it should be conditional upon mitigation of the above mentioned impacts by any future proposal. This will require a careful design exercise involving designers with heritage and urban design experts.

Also, the recommendations of the Conservation Management Plan submitted with the proposal suggest that the site may be of State or potentially National significance. The proposal identifies the following items as having either exceptional or high heritage significance:

- Dunmore House,
- Ashwood House,
- Old & New Spinning Mill,
- Bonds Administration building, storage building, cutting room and cotton bale stores
- Company archives and small movable heritage,
- Factory equipment,
- Plans and drawings,

It is therefore, recommended that heritage significance of these items be assessed further as part of the planning proposal and if appropriate, consideration be given to nominate these items on the State Heritage Register.

The proposed Development Control Plan (DCP) submitted as part of the application has been reviewed and it is recommended that the following objectives and development controls as outlined below be inserted within the DCP post exhibition:

Objectives

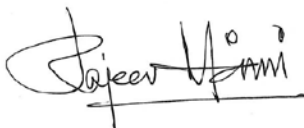
- To ensure adequate protection and best-practice management of archaeological relics.
- To identify the potential for archaeological remains.
- To minimise the potential for the disturbance of archaeological relics likely to be located on the site.

Controls

- An historical archaeological assessment should be prepared by a suitably qualified and experienced historical archaeologist to inform the stage 1 redevelopment of the site. This assessment should clearly identify and assess the potential for archaeological relics and engineering works, including providing an assessment of their significance in accordance with the NSW Heritage Division guideline *Assessing Significance for historical archaeological sites and Relics, 2009*. The Assessment should then consider what impacts, if any, the proposed activity will have on any potential archaeological resource and include appropriate recommendations for its management according to significance. The Assessment should be submitted to Council for consideration in support of the Stage 1 redevelopment application.
- Where the assessment determines that the development would disturb a potential historical archaeological resource, an application for an excavation permit under the NSW Heritage Act 1977 must be submitted to the NSW Heritage Council. A copy of the report and the permit are to be provided to Council prior to the issue of a Construction Certificate.
- The applicant is to lodge, prior to any approvals being granted, a Construction Heritage Management Plan which addresses the following:
 - a) Mitigation measures that will be in relation to the likely archaeology onsite;
 - b) The proposed monitoring in place for any archaeological relics uncovered;
 - c) Training, resources and consultation for staff on the site during excavation;
 - d) Incident management protocol; and
 - e) Methods dealing with unexpected finds during works.
- During the development, if any archaeological remains are discovered, the developer is to stop works immediately and notify the NSW Heritage Division and Council. Any such find is to be dealt with appropriately, in accordance with the NSW Heritage Act 1977, and recorded, and details given to Council prior to the continuing or works.

If you have any further enquiries regarding this matter, please contact Bronwyn Smith, Heritage Assessment Officer, Heritage Division, Office of Environment and Heritage, on (02) 9873 8604 or via email to bronwyn.smith@environment.nsw.gov.au

Yours sincerely,



Rajeev Maini
Acting Manager, Conservation
Heritage Division
Office of Environment & Heritage
As Delegate of the NSW Heritage Council
6 September 2016