

29 May 2018

Catholic Metropolitan Cemeteries Trust
c/- Urbis Pty Ltd
Tower 2, Level 23, 201 Sussex St
SYDNEY NSW 2000

REQUEST FOR ADDITIONAL INFORMATION

Environmental Planning and Assessment Regulation 2000 - Clause 54

Development Application No: 3293/2017/DA-C

Property: Lot 1 DP 218016, Lot B DP 370979, Lot 22 DP 564065
166-176 St Andrews Rd, Varroville

Development: Construction and operation of a new cemetery and parklands

I am writing to advise that a detailed assessment of your application has been undertaken, following the subject application's public exhibition and the receipt of information from Government agencies.

As a result, the following information is considered necessary to be submitted to Council to allow the further consideration of your application:

1.0 Heritage

Enclosed at **Attachment 1** are the referral comments received from the NSW Heritage Council. You are requested to provide a response to these comments and if necessary, amended/additional documentation; however, please note that Council does not expect or require the preparation of a DCP as suggested in the correspondence.

Based on the Heritage Office comments and a preliminary assessment of the DA by Council, the following matters are of particular concern:

1. Insufficient details of proposed landscape furniture have been provided to properly assess the impact of the proposal on the heritage values of the Site and adjoining Varroville State Heritage Item;
2. The proposed access road (Road No. 11), toilet block and car park area should all be relocated as currently these structures are located within the "No build" area designated to reduce the impact to the State Heritage Register Listed Item

- Varroville Homestead. This area is highly significant as part of the wider landscape of the homestead and any new structures, and specifically a car park in this area, will affect that relationship and significance;
3. The proposed road width and verges are excessive and intrusive within the wider Varroville landscape;
 4. The proposed Access C is too close to the existing driveway for Varroville Homestead and should be relocated further away;
 5. The loop road (Road No.10) connected to Road No. 3 from proposed Access C should be redesigned as a pedestrian walkway to reduce the amount of hardstand close to Varroville Homestead;
 6. To minimise the impact of the proposal on the heritage significance of Varroville House and its curtilage, you are requested to consider amending the DA to include a greater "buffer" zone surrounding Varroville House where no gravesites, walking paths, roads, car parks, picnic areas or any other works, structures or activities would be permitted other than perhaps landscaping complementary to the landscaping surrounding Varroville House.
 7. Additional information is required demonstrating how the proposed development is consistent with Clause 7.7(3) of CLEP 2015 as the proposal includes car parking structures, toilet facilities, sculptures between 2-5m high, shelters, bird hides, water stations and a soil depot within the "No Build" area designated by the LEP;
 8. Notwithstanding the above, the area south-west of Varroville House should be amended to delete the 700mm headstones and Ash Interments to minimise the adverse impact on the heritage curtilage of Varroville House and to minimise the need to use substantial vegetation screens in this part of the Site, which is inconsistent with the open landscape character of the Site and detracts from the appreciation of Varroville House sitting at the high point of this lower part of the Site;
 9. A preliminary structural impact assessment on Varroville House and associated structures must be submitted addressing all proposed works in proximity to this State Heritage Item;
 10. Further details must be provided in respect of the intended future use of the restored heritage buildings (i.e. the Outbuildings Precinct) noting that the HIS indicates use for "educational purposes" although CLEP 2015 only permits use of this part of the land for lawn cemetery and fencing;
 11. Additional Visual Impact Assessment is required specifically addressing the views to and from Varroville Homestead at 196 St Andrews Road and how they will be impacted by the proposed development. In particular, the additional assessment should consider views between the Homestead and other areas of heritage significance within the Site (such as the western dams, vineyard and other trenching areas and former driveway) as well as between the Homestead and other vantage points such as Bunbury Curran and the views/vistas as identified by the Conservation Management Plan.

The Visual Impact Assessment should include all proposed structures (e.g. café, function centre, headstones, roads, water stations, shelters, sculptures, etc) to ascertain whether views will be obscured by these structures.

In addition, assessment of impacts of the proposed landscaping across the Site is required to ascertain the impact on views as well as the overall setting of the Homestead and associated heritage features of the site when viewed from within and from outside of the Site.

2.0 Traffic

2.1 Peak Visitation Periods and Cumulative Impacts

The Transport Impact Assessment (TIA) does not consider potential traffic generation during special holidays and All Saints Day. Nor does it consider the cumulative traffic impacts on the road network from visitors as well as the potential traffic generation from funerals, especially when the burial plot capacity increases over the various stages of construction. An amended TIA that considers these peaks and cumulative impacts is required prior to determination of the DA.

2.2 Intersection Analyses

The TIA only models the impact of the proposal on one intersection and this is insufficient to assess the impacts of the proposed development. A revised TIA must be submitted which assesses the following intersections:

- St Andrews Road / Campbelltown Road (NB: the RMS has indicated that there are no current plans to extend St Andrews Road to Camden Valley Way);
- Spitfire Drive / Thunderbolt Drive;
- Spitfire Drive / Raby Road; and
- Raby Road / Thunderbolt Drive.

In addition, further information regarding the forecast split of traffic using the four proposed Site Access points must be submitted and if necessary, all access points should be modelled.

All intersections shall be modelled in SIDRA with all assumptions included in the revised TIA report. Modelling is to be based on at least a 20 year design horizon with respect to background growth. Background growth estimates shall be obtained in discussion with Council as Council has a traffic model and recent traffic data which may be of assistance.

A digital copy of all SIDRA modelling files must be provided for further investigation by Council.

2.3 Sight Distances

The TIA indicates that all new Site access driveways will not comply with the Austroads required Sight Distances and will require relocation of the boundary treatments and trimming/ removal of the roadside vegetation. However, no details in this regard have been submitted as part of the DA.

Further details regarding the extent of vegetation and boundary treatment amendments is required prior to determination of the DA and this may necessitate amended architectural, landscape and civil engineering plans.

2.4 Road Widening

Insufficient details have been provided with regard to the proposed design for Access B including details of impact on trees, drainage and whether any localised road widening is required.

3.0 Stormwater

3.1 Chapel Location

The proposed Chapel straddles an existing overland flow path. Site inspection of the small headwater catchment located in the adjoining Council land showed evidence of significant Hewlettian (saturation excess) flow, as well as interflow, contributing to overland flow. The soil layer hydraulic conductivities provided in the Soil Landscapes of the Wollongong Port Hacking 1: 100,000 sheet would be expected to result in significant Hewlettian flow in the right circumstances.

In this regard the hydrologic model used to generate overland flow only accounts for Hortonian (infiltration excess) flow. Hewlettian flow can be dominant in small headwater catchments such as the subcatchments draining to the road above the Chapel.

This possibility and how overland flow can be diverted away from the Chapel must be addressed in an amended Flood Assessment.

3.2 Technical Information Required

The following technical information is required:

1. The TUFLOW model developed for the proposal must be submitted to Council. The model should show results of the full range of rainfall events considered for the study, the minimum duration of rainfall event should be 15minutes. The Max files must be sent with the model results. The results layers should be readable in MapInfo.
2. The MUSIC model is required to be submitted for review.

4.0 Vegetation Removal/Land Slip Risk

Insufficient information has been submitted to properly assess the risk of land slip in areas of moderate and high stability risk, particularly in regard to the extensive revegetation works proposed, which are not referred to in the Stability Assessment. An amended Stability Assessment and an amended Vegetation Management Plan are required providing detailed recommendations in regard to vegetation removal and replanting areas, practices and timeframes and drainage control.

Furthermore, additional information is required to assess the stability of the existing dams and if necessary, detailed recommendations for suitable stability measures must be prepared.

5.0 Landscape Design Response

The Landscape Design Response_(LDR) does not include the presence of Picton Soil Landscape at the north western vegetated part of the site which has limitations of steep slopes, mass movement (slump) hazard, water erosion hazard, localised shallow soils, localised surface movement potential; some impermeable and highly plastic subsoils. There are localised soil erosion tunnels and rills on the ephemeral drainage lines on the site which needs to be carefully managed in the VMP and remediated on the site.

6.0 Acoustic

The Acoustic Assessment only addresses Stage 1 of the proposal and this is insufficient to enable approval to be granted to subsequent stages. Furthermore, the Stage 1 shown in the Acoustic Report does not correlate to Stage 1 shown on other documentation submitted with the DA. An updated acoustic report is required should approval be sought for development outside the "Stage 1" area identified in the Acoustic Report.

The Acoustic Assessment recommends that noise mitigation measures are required to mitigate adverse external road noise impacts although no detailed recommendations are included and no other documentation submitted with the DA provides information in regard to how the design has been amended to include such

mitigation and contrary to the SEE suggestion, Conditions of Consent cannot be imposed to address this matter.

The Acoustic Assessment does not include any assessment of potential noise impacts associated with site activities such as grave digging, lawn mowing, hedge trimming, etc which are likely to cause significant disturbance to surrounding properties, particularly the residence at Varroville House.

An amended Acoustic Assessment must be submitted addressing the above matters prior to determination of the DA and where necessary amended plans may also be required. Where any proposed mitigation measures involve removal or addition of vegetation or other built structures, other relevant amended supporting plans and reports must also be submitted.

7.0 Bushfire

7.1 Road Access

Additional information is required to demonstrate that all internal roads for each stage will be through roads or dead ends no longer than 100m with a 12m outer radius turning circle, noting that some roads in Stage 1 and Stage 4 will be dead ends until later stages are completed.

7.2 APZs

The Bushfire report must be amended to detail how the proposed APZs around buildings will be achieved given the requirement to maximise the conservation of trees – e.g. will this be through weed removal, modification of understorey, trimming of canopy. A detailed plan of proposed APZ works is required and this must be consistent with the FFAR and the VMP.

8.0 Contamination

A Detailed Site Inspection (DSI) by Douglas Partners September 2017 has recommended a Remediation Action Plan (RAP) be prepared to address:

- Fuel/ oil spillage near TP 14 - RAP to inform how to remediate and validate;
- Lead (at TP17) and zinc contamination (at TP 17, 39 and 41) - RAP to inform how to remediate and validate (NB: Drawing 9 in Appendix A shows the Test Pit locations but omits TP 39);
- Dieldrin and Aldrin pesticides near the homestead and sheds;
- Asbestos near the former homesteads and sheds - RAP to identify HazMat Survey prior to demolition and disposed of by licensed contractor and ground surface inspection after demolition and hand removal;
- Poly Aromatic Hydrocarbons (PAH) in surface soils next to timber power poles - RAP to investigate and delineate impact, remediate and validate.

The DSI also recommends an Unexpected Finds Protocol be prepared.

A RAP must be prepared and submitted prior to determination of the DA and will not be considered as a Deferred Commencement matter.

9.0 Flora and Fauna

9.1 Inconsistencies

1. The submitted Statement of Environmental Effects (SEE) indicates that 35ha of native vegetation will be conserved whereas the Flora and Fauna Assessment Report (FFAR) indicates that there is 23.53ha of native vegetation of which 1.73 ha

will be impacted resulting in retention of 21.8ha. The actual area of native vegetation to be retained must be clarified.

2. The SEE indicates that 119 trees are proposed to be removed although the FFAR indicates that 35 trees are to be removed. The actual number of trees to be removed must be clarified.

9.2 Natural Burials

Council is not supportive of burials under remnant CPW trees and further information is required in this regard

The SEE indicates that there will be burials around each remnant tree at the rate of 5 every five years at double depth and that there will be ash interment although no justification has been provided why there will be reburials after 5 years as comparable cemeteries in Kemps Creek and Gungahlin ACT have a 30 year reburial period in natural burial areas.

There is also no description of whether the burials will be horizontal or vertical and no assessment of the impact of leachate or deep digging on the remnant trees in either the Arborists Report or the FFAR.

9.3 Migratory Species

The FFAR must be amended to include an assessment of the impact of removal of the dam/s on EPBC migratory species such as Cattle Egret, waterbirds, frogs or on aquatic fauna utilising the dam.

9.4 Habitat Trees

The FFAR indicates that 15 significant habitat trees and 87 habitat trees (Table 4.5) occur on the site with 35 trees requiring removal according to the Tree Assessment Report (TAR), six of which occur along the roads HT2 (T413), HT4 (T1437), HT5 (T1438), T1362, SHT9 (T1364) and T1365. The exact location of the habitat trees to be removed must be mapped within the FFAR at A3 scale with a readable Legend.

The map (Figure 4) appears to contain an error where HT2 should read as T415 (not T413) in the text to align with Table 4.5 and the TAR. Figure 4 must be amended to include the location of HT2 (T413), HT4 (T1437), HT5 (T1438), T1362, SHT9 (T1364) and T1365. Figures 3 & 4 must be resubmitted at A3 scale with mapping labels legible.

9.5 Moist Shale Woodland EEC

The presence of Moist Shale Woodland on the site is of note as this does not occur elsewhere in the Campbelltown LGA. The FFAR however does not provide an adequate justification for its identification. It states *'There was not a lot of difference in species make up between the Cumberland Plain Woodland and Moist Shale Woodland.'* ...*'However, the soil type, aspect and topography are more suited to this vegetation unit as opposed to Cumberland Plain Woodland vegetation however.'*

No reference has been made to the NSW Scientific Committee Final Determination or any systematic floristic study to justify the identification of Moist Shale Woodland as being present on the site. There is no mention of what the soil type is or how this links to the identification of the vegetation community. The species list does not indicate which quadrats or random meander the species were located within and does not demonstrate how this vegetation community identification was derived.

The FFAR must be amended to provide discussion and evidence of how the identification of this community was determined as being present on the site.

If the vegetation is found not to be MSW then a number of the DA documents will require updating to reflect this.

9.6 Koala Habitat

The FFAR has not examined the draft Campbelltown Comprehensive Koala Plan of Management 2016 that maps the land at Varroville as being land to which the Plan applies. It also maps the land as 'Potential koala habitat – Secondary (Class B)'. Both the CKPoM and SEPP 44 Guidelines (Circular B35) Section 2.1, state that to investigate whether that potential koala habitat is core koala habitat requires a survey to be undertaken on the site in accordance using standard reportable techniques of koala survey.

Therefore a koala survey must be undertaken on the site in order to investigate whether the site is core koala habitat, using standard reportable techniques of koala survey in accordance with Circular B35 - SEPP 44 Koala Habitat Protection Guidelines - Section 2.1 *Investigating Potential Koala Habitat for Core Koala Habitat (i)-(iv)*, such as RG-bSAT technique outlined in Appendix D of the CKPoM.

9.7 Asset Protection Zones

A map of the APZs must be provided as an overlay within the FFAR and the impacts of APZ establishment and maintenance need to be described along with methods to minimise the impacts.

10.0 Watercourse Assessment Report

The Watercourse Assessment Report (WAR) needs to link the proposed revegetation of vegetation along watercourses to being undertaken in accordance with the Vegetation Management Plan.

There are many inconsistencies and mislabelling within the WAR such that it cannot be relied upon in its current form, as follows:

- Section 3.2.1 Recommended Management states '*Remove Dam 9 or convert to a landscape feature; Retain Dam 7 is proposed to be removed*' which conflicts with Section 3.3.1 Recommended Management which states '*Retain Dam 9 as an ornamental feature and stormwater control*'. From these statements it is not possible to determine if Dams 7 and/ or 9 are being removed or retained;
- Section 3.2 states '*Two (1) large online dams built with functional spillways*' – Clarification is required as to whether this means one (1) or two (2) dams and whether it refers to Dams 2 and 4, or Dams 4 and 5, or Dam 4 only;
- Photo 17 is unclear as its caption states that it refers to Dam 9 and Dam 10 however, the figure labels them as Dam 8 and Dam 9. Dam 9 in Photo 30 does not resemble Dam 9 in Photo 17;
- The text describes Dam 9 as occurring within Catchment A3 and also as occurring within Catchment B;
- Photo 32 shows Dam 12 and Section 3.3.1 has recommended management as '*Dam 12 should be filled or reconstructed as a landscape feature* - Is the intent to fill the dam or keep it as a landscape feature? Furthermore, there is no Dam 12 mapped in Figure 5 – Validated watercourses.

It is unclear which dams are being retained or removed as the SEE states that there will be drainage to six (6) out of 11 dams on the site. It has not described what will happen to the remaining five dams. It refers to the [Watercourse Assessment](#) stating

that there are 11 watercourses, 11 dams and 15 drainage lines on the site. However, the WAR text has 12 dams on site (not 11 as in the SEE) and is unclear about the intention regarding dams 7, 9 & 12.

An amended WAR is required that includes a table summarising the correct information relating to each water feature that clearly indicates its name, catchment, size, description of condition and recommended action. The SEE must also be updated with the correct information.

11.0 Tree Assessment Report

The Tree Assessment Report (TAR) states that there will be 28 trees removed for the development and 91 trees removed due to safety reasons; totalling 119 trees. It states that there are 89 hollow-bearing trees on the site but does not quantify the number of hollow bearing trees to be removed. The number of hollow bearing trees to be removed must be identified in an amended TAR.

The statement that 'no tree will have the TPZ impacted by the proposed development' implies that there is no reason to remove trees due to the development and this shall be clarified and if correct, amended plans and supporting reports must be submitted.

The Schedule 2 map 'Tree Survey and Assessment (Overview)' must be submitted at A3 size or larger with legible legends, all codes appearing as the top layer and identified in the legend.

How tree management will be addressed through the five development stages of the 150-year planning time frame must be addressed in an amended TAR including replacement of the trees removed as part of the development and ongoing tree replacement as trees senesce through time.

12.0 Vegetation Management Plan

The VMP must be amended to extend to 20 years as it states that the restoration program will be at least 20 years. The plan must be reviewed every five years.

Any development consent will be subject to a condition requiring a new VMP to be prepared at every new development phase throughout the 150-year life of the planning approval.

Section 3.1.1 Management Zone A – Escarpment Reserve must be amended to include the weed removal techniques that are appropriate for the steep land within this zone. It must detail how vegetation restoration and soil erosion control techniques are to be coordinated in the large erosion gullies within the zone.

The VMP must be amended to recognise that riparian restoration is to be undertaken in a manner so as to not destabilise or further destabilise creek banks and that techniques such as *'All weeds will be stripped from the riparian corridor within the site'* are inappropriate.

The VMP must be amended to include appropriate techniques for riparian restoration including staged removal of small areas of the riparian zone weeds using manual techniques such as 'cut and paint' and 'drill and frill', bagging and removal of weed propagules from the site, reuse of logs to stabilise the creek bank. In revegetation areas along the creek the use of pegged and overlapped jute matting

and long-stem planting should be included as a suitable technique. The VMP must specify planting density of trees, shrubs and ground covers for the riparian zones in addition to CPW and MSW areas.

13.0 Landscape Species Plan

The Landscape Species Plan must be amended to change the colours used as there are three similar shades of green and there are no codes on the plan making it impossible to evaluate where the different tree species are proposed for planting. For example, where are the Turpentine trees, a species that is not indigenous to the site, proposed for planting?

14.0 Landscape Masterplan

The Overall Site Plan must be amended to have clearer hatching as it is not possible to read the map to distinguish between the four types of burial zones in the legend. There is no legend key for the orange circular symbol within the natural burial area.

Although the legend indicates a symbol for Cumberland Plain Woodland to be cleared and there are areas of CPW to be cleared referred to in the FFAR, there are no areas of clearing shown on the site plan.

15.0 Public Art Strategy

The proposed Public Art Strategy includes indicative maximum heights for sculptures up to 10m in height which exceeds the LEP building height of 9m. Further information is required for all proposed sculptures and gateways (including to St Andrews Road), particularly where it is intended to exceed the 9m building height limit or alternatively, consent for sculptures will be subject to future development application/s.

16.0 Additional Information

16.1 Fencing and Gates

Detailed fencing and gate (including adjoining walls) designs including materials and finishes are required to be submitted prior to determination.

16.2 Materials and Finishes

A detailed Materials and Finishes Schedule for all buildings must be submitted prior to determination.

16.3 Reflectivity

Details of reflectivity of all materials proposed to be used must be provided (e.g. glazing, metal sheeting, sculptures, landscape furniture etc) and an assessment undertaken in accordance with Clause 7.6 of CLEP 2015.

16.4 Waterbody Safety

An assessment relating to safety near waterbodies must be submitted for consideration by Council's Executive Manager Infrastructure, including depth of waterbodies, fencing, safety equipment, etc, noting that there are playgrounds areas proposed near waterbodies contrary to the assertions within the Landscape Design Response document submitted with the DA.

16.5 Pathways Through Vegetation

Further details relating to the proposed pathways through vegetation on the upper slopes of the northern part of the Site must be submitted including an assessment of the visual impact of these pathways cutting through vegetation to be retained/revegetated, drainage, landslip/stability, materials, etc.

In addressing the aforementioned matters, the following information is required to be submitted to Council to enable the further consideration of your application:

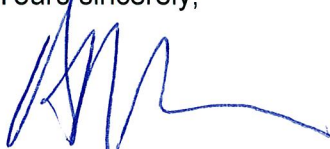
- a. A covering letter stating how the revised information you are supplying to Council satisfies each point listed above.
- b. Four copies of all amended plans and associated documentation, with plan and document version numbers and dates updated.
- c. Electronic copies of all amended plans and documentation shall be submitted to council@campbelltown.nsw.gov.au.
- e. All plans shall be folded to A3 size (not rolled) and shall be collated into sets and stapled.

Your response to this matter is requested within 28 days from the date of this letter.

Please be advised that Council has secured a time and date to brief the Sydney Western Sydney Planning Panel on the proposal. This date is in early June and will ensure that the application's processing through the Panel Secretariat will continue.

If you require any further information, please contact me on (02) 4645 4566.

Yours sincerely,



Andrew MacGee

Acting Executive Manager Urban Release and Engagement



File No: SF17/50704
DOC No: 17/548255
DA No: 3293/2017

Mr Fletcher Rayner
Executive Manager Urban Release
Campbelltown City Council
PO BOX 57
CAMPBELLTOWN NSW 2560

Attention: Andrew MacGee
Email: council@campbelltown.nsw.gov.au

Dear Mr Rayner

RE: VARROVILLE CURTILAGE EXTENSION & LAWN CEMETERY DEVELOPMENT APPLICATION (DA) – HERITAGE COUNCIL COMMENTS.

I write regarding the Development Application referred to the Heritage Council of NSW for the Varroville Lawn Cemetery development application. The Heritage Council of NSW would like to thank you and your team for referring this matter for comment.

At its meetings on 6 December 2017 & 7 February 2018, the Heritage Council of NSW considered the above presentation and provided the following advice:

The Heritage Council recommends that:

1. A Development Control Plan (DCP) be developed in consultation with the Heritage Division prior to the Development Application being finalised to further reduce the impacts on the existing Varroville House in terms of setbacks, built form, materials, noise, hours of operation and maintenance. To provide guidelines for the development of the subject site, the DCP should incorporate the following documentation:
 - An endorsed Conservation Management Plan
 - Plan of Management
 - Landscape Masterplan
 - Interpretation Plan
 - Sustainability Strategy
2. The landscape master plan referred to in point 1 should include details of all landscape furniture, including but not limited to details on the proposed shelters, signage (both way finding and interpretation), seating, and all other landscape ancillary uses. The Heritage Council is concerned that insufficient detail has been provided at this stage in the proposal to adequately assess the impacts of the changes and furniture on the overall significance of the wider Varroville landscape.

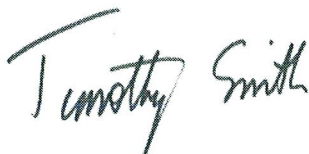
3. Rather than test excavation and exposure of the potential relics, redesign of Precincts 3 & 4 to remove the impacts in the first place is a better option. The Heritage Council considers in-situ conservation to be the best way of managing the archaeological resource into the future.
4. The proposed access road, toilet block and carpark area should all be relocated as currently these structures are located within the designated "No build" area. This area was designated as a "No build" area to reduce the impact to the State Heritage Register Listed Item - Varroville Homestead. Furthermore, this area where these structures are proposed is highly significant as part of the wider landscape of the homestead and any new structures, and specifically a car park in this area, will affect that relationship and significance.

It is recommended that further investigation be undertaken in this regard and an amended plan be referred to the Heritage Council or its delegate for approval prior to any development consent being issued.

5. The Heritage Council considers that the proposed road width and verges are excessive and intrusive within the wider Varroville landscape and recommends that further investigation be given to reducing their width. This is to ensure that the proposed road network fits smoothly in the natural landscape features of the site and are not unnecessarily visually intrusive.
6. The Heritage Council considers that the proposed Access C is too close to the existing driveway for Varroville Homestead and should be relocated further away from the homestead to ensure that the residents of Varroville enjoy their current quality of life without excessive noise that cars would generate given the proposed hours of operation of the cemetery.
7. The Heritage Council considers that the loop road (indicated on the plans as Road No.10) which is connected to Road No. 3 from proposed Access C should be redesigned as a pedestrian walkway to reduce the amount of hardstand close to Varroville Homestead for the reasons outlined in point 6, above.

If you have any questions regarding the above matter please contact Bronwyn Smith, Senior Heritage Assessment Officer at the Heritage Division, Office of Environment and Heritage on 9873 8604 or at Bronwyn.smith@environment.nsw.gov.au.

Yours sincerely



Tim Smith OAM
Director, Heritage Operations
Office of Environment and Heritage
As Delegate of the NSW Heritage Council
19 February 2018