

Our ref: HMS ID 11701

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Advice on Environmental Impact Statement – State Significant Development

Proposal: Residential Development with In-fill Affordable Housing - 21, 23 & 25 McIntosh Street and 55 Werona Avenue, Gordon

Major Project reference: SSD-83478456

Received: 4 September 2025

Dear Mr Tran,

Thank you for your referral dated 4 September 2025 inviting the Heritage Council of NSW to provide advice on the Environmental Impact Statement (EIS) for the above State Significant Development (SSD) proposal.

The following reports were considered in our assessment:

- Relevant parts of *Environmental Impact Statement*, Gyde Consulting, 17 July 2025, including the following appendices.
 - Appendix H: *Arboricultural Impact Appraisal and Method Statement*, Ezigrow, 22 May 2025;
 - Appendix I: *Historical Archaeological Assessment*, Biosis, 21 May 2025 (HAA);
 - Appendix J: *21-25 McIntosh Street and 55 Werona Street Gordon SSDA Design Report*, PMDL Architecture, July 2025 Revision C
 - Appendix K: Architectural drawings for McIntosh and Werona Ave Residential Development, PMDL Architecture, issued for SSDA (various dates);
 - Appendix S: *21, 23 and 25 McIntosh Street and 55 Werona Avenue, Gordon SSDA - Heritage Impact Statement*, Urbis, 11 July 2025; and
 - Appendix U: Landscape Documentation Set for SSDA, Studio IZ, issue A 27/05/2025.

- Updated shadow diagrams, drawings DA 50.70 rev C and DA50.71 rev C, PMDL Architecture, 11/09/2025 (received by email).

We have also referred to *Eryldene Conservation Management Plan 2023* in our assessment.

Advice – Heritage Council of NSW Approvals Committee

The Heritage Council of NSW Approvals Committee considered the EIS for the proposed SSD at their meeting on 30 September 2025 and passed Resolution 2025-44 as follows.

The Approvals Committee resolves to:

1. **Note** that the proposed design concept for Residential Development 21, 23 & 25 McIntosh Street and 55 Werona Avenue, Gordon – SSD-83478456 does not respond to the local character and there needs to be an alternate and sympathetic design approach.
2. **Advise** DPHI that the proposed SSD will adversely impact the State Heritage Register (SHR) listed Eryldene, which is internationally recognised for the significance of its house and gardens.
3. **Advise** that the bulk and scale of the proposed SSD would make it prominent and intrusive from within Eryldene’s garden and diminish the experience of this exceptionally significant garden and its associated structures and buildings. It would also adversely impact on the wider context and setting of the place.
4. **Advise** DPHI that overshadowing of Eryldene’s garden would have an adverse impact on the viability and sustainability of the vegetation, resulting in an adverse heritage impact, especially on the unique and internationally recognised camelia collection.
5. **Recommend** that the SSD be re-conceptualised to substantially reduce the height of buildings in locations A and B by at least three stories to reduce the visual impacts of the setting and amenity of Eryldene and alleviate overshadowing.
6. **Recommend** that the revised scheme should include large trees for canopy replenishment, particularly along the site’s south-western boundary to provide visual screening.
7. **Recommend** that any proposal should be tested with photomontages in relation to context, setting, and views within and around Eryldene.

In addition the Approvals Committee is concerned that the potential impacts of the SSD on the significant vegetation within the gardens of Eryldene, including its internationally significant collection of camelias, has not been adequately assessed in the EIS, including impacts related to overshadowing and changes to ground water hydrology. We recommend that additional expert assessment be provided in this regard.

Advice – Historical Archaeology

The HAA has identified areas of low and moderate potential archaeological associated with occupation of the SSD site from the 1920s onwards but assesses that none of the potential archaeological remains would likely be of local or state significance. The report recommends that an unexpected finds protocol be implemented during construction. The HAA assessment and recommendations are supported.

As the site is in the vicinity of local heritage items advice should be sought from the relevant local council.

If you have any questions about this correspondence, please contact Anna Simanowsky, Senior Assessments Officer at Heritage NSW on (02) 9873 8500 or heritagemailbox@environment.nsw.gov.au

Yours sincerely,

Alison Lamond

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As Delegate of the Heritage Council of NSW

3 October 2025