



Pymble Ladies' College, Grey House Precinct (SSD-17424905)

Heritage Peer Review—Final Report

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Cultural warning

Aboriginal and Torres Strait Islander readers are advised that this report may contain images or names of First Nations people who have passed away.

Report register

The following report register documents the development of this report, in accordance with GML's Quality Management System.

Job No.	Issue No.	Notes/Description	Issue Date
21-0379	1	Heritage Peer Review—Draft Report	11 February 2022
21-0379	2	Heritage Peer Review—Final Report	22 April 2022

Quality assurance

The report has been reviewed and approved for issue in accordance with the GML quality assurance policy and procedures.

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Executive Summary

The State Significant Development Application (SSDA) for the Pymble Ladies' College Grey House Precinct development is currently being assessed by the NSW Department of Planning, Industry and Environment (DPIE). A Heritage Impact Statement (HIS) has been submitted in relation to the proposed development, and DPIE has commissioned this peer review report to review the adequacy of the HIS in assessing the potential heritage impacts of the project in response to the Secretary's Environmental Assessment Requirements.

The Grey House Precinct, although not listed as an item of local significance, is in the vicinity of a heritage conservation area and multiple items listed on the *Ku-ring-gai Local Environment Plan 2015*.

In summary, the findings of this peer review report are that the proposed development will not result in any substantive impacts on the heritage significance of the Pymble Avenue Heritage Conservation Area, the individually listed heritage items located within its boundaries, or on the (unlisted) significant buildings and spaces within the broader PLC complex.

In terms of potential heritage impacts, there would be no objections to the SSDA being approved. Moreover, given the findings of the peer review, there would be no requirement to impose consent conditions to avoid or mitigate any impacts on heritage significance.

However, despite the validity of the findings of the HIS, the report itself has a number of fundamental flaws and omissions. The research and analysis of the HIS is in some respects—especially the historical and physical analysis, and the assessment of heritage significance—inadequate and not compliant with that required by the guideline *Statements of Heritage Impact*, and by other widely utilised and accepted guidelines such as the *Australia ICOMOS Burra Charter, 2013*.

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1 Introduction

1.1 Background

The NSW Department of Planning, Industry and Environment (the Department, DPIE) has commissioned GML Heritage Pty Ltd (GML) to prepare an independent peer review of a Heritage Impact Statement (HIS) prepared by NBRS. The HIS (dated 11 August 2021) has been submitted in relation to a proposed development of the Grey House Precinct within the grounds of the established Pymble Ladies' College, Pymble. DPIE is currently assessing the State Significant Development Application (SSDA) for the project.

Although it is not listed as an item of local significance, the Grey House Precinct (or Grey House) is in the vicinity of a heritage conservation area (Pymble Avenue HCA) and multiple items listed on the *Ku-ring-gai Local Environment Plan 2015* (Ku-ring-gai LEP 2015). Further details of the heritage context are included in Section 1.6 of this report.

This report provides an independent peer review of the HIS and includes recommendations to inform DPIE's assessment of this application.

1.2 Site identification

The Grey House Precinct is within the Pymble Ladies' College (PLC) complex, located in the Ku-ring-gai Local Government Area on the southeastern side of Avon Road and west of Pymble Station, as shown in Figure 1.1 and Figure 1.2. It is identified as Lot 1 DP69541. The area of proposed works is located on the southern portion of the lot, along the southeast boundary shown in Figure 1.2.

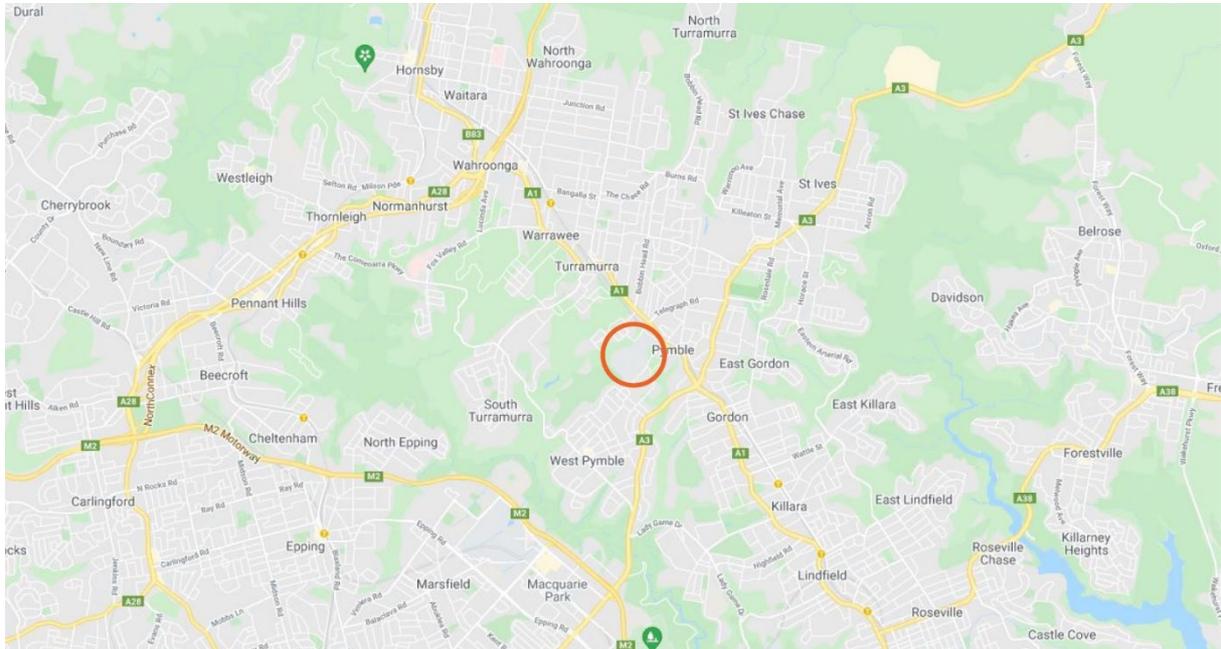


Figure 1.1 Map showing the subject site circled. (Source: Google Maps with GML overlay)



Figure 1.2 Aerial photograph showing the PLC boundary outlined in yellow. The site area is shown circled in red. (Source: Nearmap with GML overlay)

1.3 Methodology

This report has been prepared with reference to the guideline document *Statements of Heritage Impact* by the former Heritage Office and Department of Urban Affairs & Planning (1996, revised 2002). This report is also consistent with the relevant principles, guidelines and terminology of the *Australia ICOMOS Burra Charter, 2013* (the Burra Charter).

GML staff completed a site inspection on 13 December 2021.

The key issues relevant to the adequacy of the HIS as an objective, rigorous assessment of any potential heritage impacts of the proposed development are set out in Section 4.2 of this peer review report. However, where appropriate, comments regarding the adequacy of the background sections of the HIS—namely Documentary Evidence (Section 2.0) and Physical Evidence (Section 3.0)—are included below and in Section 2 and Section 3 of this peer review report.

1.4 Background documents

The following background documents and reports have been utilised in the preparation of this peer review report.

Document	Author	Date
Heritage Impact Statement—State Significant Development Application	NBRS Architecture	August 2021
Visual Impact Assessment Report	Geoscapes	August 2021
Scoping Report	Willow Tree Planning	April 2021
Architectural plans	BVN	March 2021
Landscape plans	Oculus	September 2021
State Heritage Inventory reports for 41, 51, 59, 61, 77b Pymble Avenue & Pymble Avenue HCA	Heritage NSW	Various

Comment

The HIS report does not specifically list the documentation upon which it relied in formulating its assessment of any potential heritage impacts, other than the SSDA architectural drawings prepared by BVN, dated 7 June 2021 (GML notes that the BVN drawings provided by DPIE for the purpose of preparing this review are dated 18 March 2021).

It is assumed therefore that NBRS did not have access to the Visual Impact Assessment Report (VIAR) prepared by Geoscapes, dated 11 August 2021. The VIAR contains useful information and analysis of key views that have the potential to be affected by the proposed development of the Grey House Precinct. The rigour of the analysis of views, particularly of the proposed development from within the Pymble Avenue HCA, would have been enhanced if the HVIA had been considered by NBRS in preparing the HIS.

1.5 Secretary's Environmental Assessment Requirements terms of reference

The HIS includes the following extract from the DPIE's relevant Secretary's Environmental Assessment Requirements (SEARs) for the Grey House SSDA, which sets out the scope for addressing any potential heritage impacts (Section 6.2):

Identify any archaeological potential or archaeological significance on and adjacent to the site and the impacts the development may have on this significance.

Provide a statement of significance and an assessment of the impact on the heritage significance of the heritage items on and adjacent to the site in accordance with the guidelines in the NSW Heritage Manual (Heritage Office and DUAP, 1996) and Assessing Heritage Significance (OEH, 2015).

Include an assessment of impacts upon the Pymble Avenue Conservation Area (C11) which is located to the south-east of the proposed works.

Comment

The scope required by the SEARs for the HIS includes both a clear assessment of both (i) the significance of any individually listed heritage items on and adjacent to the subject site (the Grey House Precinct), as well as (ii) any impacts on these items and the Pymble Avenue HCA. The extent to which the HIS addresses these SEARs requirements is set out in Section 4.2 of this peer review report.

It is noted that the HIS does not include an assessment of archaeological potential, significance or impacts, but includes the statement that 'a separate report has been prepared by Artefact Heritage Pty Ltd which addresses the archaeological potential and archaeological significance on and adjacent to the site' (Section 6.2).

1.6 Statutory and heritage context

1.6.1 Heritage listings

The PLC Grey House Precinct is not listed as an item of local heritage significance. However, it is in the vicinity of many heritage items listed on the Ku-ring-gai LEP 2015 outlined in Table 1.1 and in Figure 1.3.

1.6.2 Heritage items in the vicinity

Table 1.1 Heritage items in the vicinity of the site. (Source: Ku-ring-gai LEP 2015, Schedule 5)

Item	Address	Significance	Approximate Distance from Site	Item No.
Pymble Avenue Conservation Area		Local	100m southeast	C11
Dwelling House, 'Elderslie'	41 Pymble Avenue, Pymble	Local	200m northeast	I618
Dwelling House, 'Cotswolds'	51 Pymble Avenue, Pymble	Local	150m east	I619
Dwelling House, previously referred to as 'Grey House'	59 Pymble Avenue, Pymble	Local	100m southeast	I620
Dwelling House, 'Hilltop'	61 Pymble Avenue, Pymble	Local	120m south	I621
Dwelling House, 'Monrose'	77B Pymble Avenue	Local	220m south	I622

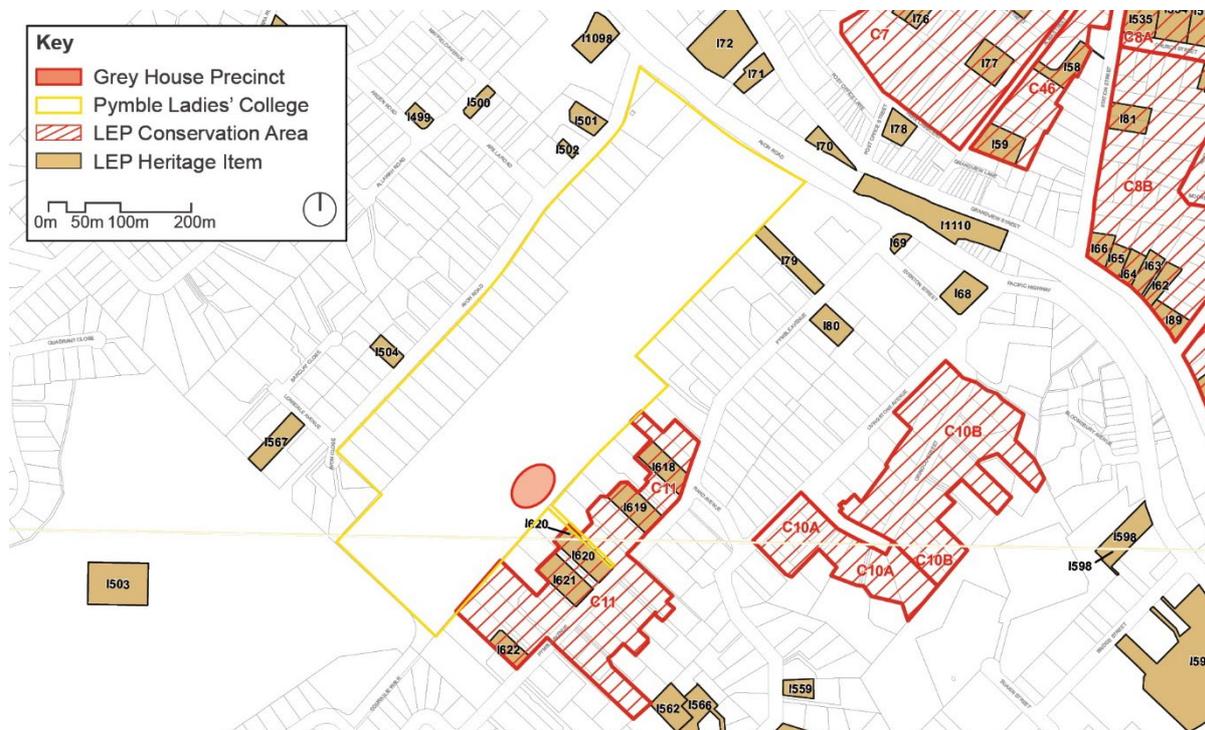


Figure 1.3 Heritage map showing the site and heritage items in the vicinity. Note: The heritage map is a composite of HER_007 and HER_008. (Source: Ku-ring-gai LEP 2015)

Comment

The HIS report lists the individual heritage listed properties, along with the Pymble Avenue HCA itself, in the vicinity of the Grey House Precinct. It indicates that this proximity would warrant consideration in respect of any visual impacts that could arise as a result of the proposed development (Section 4.1). These properties are:

- Dwelling House, 'Cotswolds', 51 Pymble Avenue, Pymble, item number I619;
- Dwelling House (previously referred to as 'Grey House'), 59 Pymble Avenue, Pymble, item number I620; and
- Dwelling House, 'Hilltop', 61 Pymble Avenue, Pymble, item number I621.

The HIS states that 'Other heritage listed items in the vicinity of the subject site are visually and physically separated from the site by intervening development, local topography, roadways and distance'. Although the analysis of key views is likely to support this presumption, it is prudent in the first instance to adopt a broader view of potential impacts in setting out the extent of the study area. In preparing this peer review report, therefore, the following additional heritage listed properties within the Pymble Avenue HCA have been included in the study area:

- Dwelling House, 'Elderslie', 41 Pymble Avenue, Pymble; and
- Dwelling House, 'Monrose', 77B Pymble Avenue, Pymble.

1.7 Limitations

This report is not a commentary on the appropriateness or otherwise of the heritage impacts arising from the proposed development of the Grey House Precinct. It is limited to a peer review of the adequacy of the HIS report but includes recommendations to inform the assessment of the heritage implications of the SSSA for the Grey House Precinct.

1.8 Authorship

This report has been prepared by Peter Romey, GML Special Adviser, and reviewed by Lynette Gurr, GML Senior Associate, with assistance by Loredana Sipione, GML Heritage Consultant and Planner. All photographs used in this report were taken by GML in December 2021.

2 The subject site

2.1 Historical context

The HIS includes a section setting out the historical development of the suburb of Pymble (Section 2.1) and the PLC complex (Section 2.2), which includes the subject site (the Grey House Precinct). The latter section is focused on the PLC complex within the current school boundaries. However, it does include the acquisition of Grey House in 1918. The house was used by the school as a residence for a series of principals. Following a later subdivision of the property, Grey House was sold.

Comment

The HIS historical context sections are generally comprehensive, particularly in regard to the incremental historical development of the PLC complex within the approximate current boundaries of the school. However, other than the section documenting the acquisition and role of Grey House, the HIS does not document the early twentieth-century development along Pymble Avenue, characterised by substantial houses on large allotments.

These properties are the collective basis of the heritage significance of the Pymble Avenue HCA, yet other than including the Statement of Significance for the HCA (Section 4.2), the HIS does not address this early development. Nor does the HIS explain the late twentieth-century subdivision of the allotments on the northwest frontage of Pymble Avenue, which has resulted in these rear portions being excised from the HCA.

2.2 Site description and setting

The HIS includes the following description of the subject site under the heading Description of the Site (Section 3.2):

The subject site is located towards the southern portion of the school, along the southeast boundary. The area slopes towards the southeast and is surrounded by a number of historic as well as more contemporary school buildings. In particular, the historic, two storey, Goodlet House building is located directly to the northwest, the later single storey Junior School is located directly to the northeast and the contemporary multistorey Aquatic and Fitness Centre is located to the southwest. Additionally, a number of private residential dwellings back onto an open grassed area within the school. A pedestrian pathway, referred to as the 'GREY HOUSE WALK,' is located between 57 and 59 Pymble Avenue, and connects Pymble Avenue to the subject site.

The area of the proposed works currently contains a number of contemporary, single storey, demountable classroom structures located towards the southwest portion of the site, with an open grassed area, garden beds and pedestrian pathways located towards the northeast portion of the area of proposed works.

The HIS also includes a brief description of the broader Pymble setting of the PLC complex under the heading 'Site Context' (Section 3.2). It notes that Grey House Walk, a secondary pedestrian pathway to the school, is located between 57 and 59 Pymble Avenue.

Comment

The description of the context of the subject site within the PLC complex boundaries is adequate. However, as already noted in Section 2.1 above, the 'Physical Evidence' section of the HIS does not adequately address the immediate Pymble Avenue context of the subject site, particularly the early twentieth-century development along its northwest frontage that constitutes both individual heritage-listed properties and the Pymble Avenue HCA. The only reference to these properties in Section 3.2 of the HIS is above (as underlined by GML).

Later in the HIS, under the heading 'Significance of the Heritage Items in the Vicinity and HCA in the Vicinity (Section 6.2.1)', it is stated that:

Contributory buildings located within the Pymble Avenue Conservation Area, as well as individually listed heritage items in the vicinity of the subject site are of aesthetic significance for being good examples of houses built from the Federation era through to the mid- to late- twentieth century, set within generous garden settings.

However, given the SEARs requirement for '... an assessment of the impact on the heritage significance of the heritage items on and adjacent to the site ...' and '... upon the Pymble Avenue Conservation Area', the lack of an adequate description of this immediate heritage context compromises the adequacy of the HIS.

2.3 Views

The HIS includes the following description of the key views that could be affected by the proposed development under the heading 'Views' (Section 3.3) (as underlined by GML):

Partial views of the subject site are available from the open grassed area located between Goodlet House and the Junior School. Partial views of the subject site are also available from the rear of the private dwellings which are located directly to the southeast, with glimpses available through the tall, dense plantings positioned along the southeast school boundary.

There are no notable distant views or vistas available from, or of, the subject site. The surrounding area is characterised by mature gardens with large trees as well as the areas of retained Blue Gum Forest, and as such views from the public domain are largely screened.

Comment

As noted in Sections 2.1 and 2.2 above, the 'Views' section of the HIS does not adequately address the immediate Pymble Avenue context of the subject site, particularly the Pymble Avenue HCA. The HIS notes that partial views are available from the rear of private dwellings (as underlined by GML), but does not provide any more detail about which properties would be most affected, nor does it distinguish between those properties that are individually heritage listed and/or are within the Pymble Avenue HCA and those that are not.

It is likely that in preparing the HIS, NBRS did not have access to private properties to undertake a more informed assessment of any key views. As noted in Section 1.3 above, the HIS does not reference the VIAR prepared by Geoscapes. The VIAR contains analysis of key views that have the potential to be affected by the proposed development of the Grey House Precinct, particularly within the Pymble Avenue HCA. The rigour of the analysis of views, particularly of the proposed development from within the Pymble Avenue HCA, would have been enhanced if the VIAR had been considered by NBRS in preparing the HIS.

2.4 Heritage significance

The HIS includes the following description of heritage significance for both the PLC complex itself, the individual heritage listed properties in the vicinity and the Pymble Avenue HCA, under the heading 'Heritage Status' (Section 4.1):

The subject property is not listed as an item of local heritage significance, however it is located in the vicinity of the Pymble Avenue Conservation Area (item number C11) and in the vicinity of a number of heritage listed items, as identified in Schedule 5 of the Ku-ring-gai Local Environmental Plan (LEP) 2015.

The Statement of Significance for the Pymble Avenue HCA is extracted from the Ku-ring-gai Council website (Section 4.2), but the HIS relies on the Heritage NSW database to set out the significance of the individual heritage listed properties in the vicinity (Section 4.3). With the exception of 59 Pymble Avenue (for which the significance is briefly quoted as 'Reasons for listing; cultural, architectural'), the database forms provide no significance summaries. For these properties, the HIS simply states that 'There is no Statement of Significance...'

Comment

The statement that the subject property (ie neither the PLC complex nor any of the buildings within its curtilage) is/are not listed as heritage items is correct. However, the complex does contain a number of buildings and spaces that are highly likely to be of heritage significance, notwithstanding that they are not listed. In addition, the complex itself is likely to be of historic heritage significance at least. The significance section of the HIS should have acknowledged this as a precursor to the 'Assessment of Heritage Impact' (Section 6.0), notwithstanding that later in the HIS, under the heading 'The Design Response of the New Proposal (Section 6.2.3), it is stated that 'The existing school site does, however, contain a number of historic buildings, including The Chapel, The Colonnade, and the three boarding houses (Goodlet, Lang and Marden Houses)'.

A more concerning omission is, however, the absence of any assessment of significance for the individual heritage listed properties in the vicinity (ie within the Pymble Avenue HCA). In determining whether there are any potential impacts on the heritage significance of a place, it is a fundamental requirement to first understand the nature and level of that significance. It is not acceptable to rely on secondary sources that are lacking in detail (as is the case for the Heritage NSW database forms for the individual heritage listed properties within the Pymble Avenue HCA) to determine significance, then to simply note that the database forms provide no significance summaries.

In a later section (Section 6.2.1), the HIS includes the generic statement that these properties are:

... good examples of houses built from the Federation era through to the mid- to late-twentieth century, set within generous garden settings. Their historic and aesthetic significance is understood and appreciated primarily from the public domain, looking northwest from Pymble Avenue.

The HIS concludes (Section 6.2.2) that there will be no visual impacts on significance (mainly due to physical separation and the screening of key views by extant vegetation), despite the fact that the nature and level of this significance have not been established.

The lack of a clear assessment of significance for these individual properties, particularly under the 'Heritage Status' heading, compromises the compliance of the HIS with the methodology set out in the Burra Charter and the guideline *Statements of Heritage Impact*.

3 Review of heritage impact

The following section of this peer review report examines the heritage impact sections of the HIS (Section 6.0). These sections are broadly set out to outline:

- the potential impacts on the individual heritage listed properties and the Pymble Avenue HCA within the immediate vicinity of the subject site; and
- the extent to which the design of the new building is compatible with its context within the PLC complex, especially the Grey House Precinct.

This section of the HIS concludes with an assessment of the extent to which the proposed development is compliant with the relevant controls and guidelines for assessing heritage impacts, particularly the guideline *Statements of Heritage Impact*, the *Ku-ring-gai LEP 2015* and *Ku-ring-gai Development Control Plan 2020* (Ku-ring-gai DCP 2020).

3.1 Impact on heritage items in the vicinity

The HIS includes a generic summary of the significance of the individual heritage listed properties and contributory buildings in the vicinity of the subject site, located within the Pymble Avenue HCA (Section 6.2.1).

The HIS notes that, as there are no changes to any fabric associated with these heritage properties, their 'physical fabric, overall form and garden settings ... will therefore be retained.' It goes on to state (Section 6.2.2) that:

...due to the distance and topography between the subject site and the Conservation Area and heritage items in the vicinity, the proposal will be physically separated from these significant properties. The proposal will therefore, have no impact on views from Pymble Avenue of the heritage items in the vicinity and properties located within the Conservation Area in the vicinity.

Comment

As noted in Section 2.4 of this peer review report, a fundamental requirement of heritage impact methodology is to understand the nature and level of heritage significance of a place prior to determining any potential impacts on that significance. The absence of any assessment of significance for the individual heritage listed properties in the vicinity of the subject site is contrary to the accepted methodology, and compromises the compliance of the HIS with the guidelines set out in the Burra Charter and *Statements of Heritage Impact*.

Nevertheless, the following statement in the HIS (Section 6.2.1) is correct:

The proposal does not involve any changes to any fabric associated with the heritage items in the vicinity, nor any changes to fabric associated with individual properties located within the neighbouring Conservation Area.

Regarding any potential visual impacts on individual heritage listed properties and contributory buildings in the vicinity of the subject site, and on the Pymble Avenue HCA itself, the HIS asserts that the proposed development will ‘... have no impact on views from Pymble Avenue’. This is supported by statements such as the following, that the subject site:

... is physically separated from the heritage items in the Pymble Avenue Conservation Area by an additional row of dwellings which are located to the southeast of the subject site’ and ‘due to the distance and topography between the subject site and the Conservation Area and heritage items in the vicinity, the proposal will be physically separated from these significant properties.

Other than a map (Figure 44), the HIS presents no graphic evidence to support these statements.

However, the VIAR report (which is not referenced in the HIS) contains analysis of key views that have the potential to be affected by the proposed development of the Grey House Precinct, particularly within the Pymble Avenue HCA. Even though this report was not specifically prepared to address potential impacts on the views or settings of heritage items, it does include credible photographic and simulated images of key views from within the Pymble Avenue HCA. It concludes that, although a number of properties would be subject to high or moderate view impacts, these properties are not individually listed heritage items and/or within the HCA. The only property that would be affected is 57 Pymble Avenue, which is located within the Pymble Avenue HCA but is not individually listed. In any case the visual impact is rated as moderate/minor ie:

The one property assessed that is located within the C11 conservation area, has been judged to receive only moderate/minor visual impacts from the development and these are not considered to be significant. Based on the analysis of the photography and conservation area plans, this is expected to be a similarly low visual impact outcome within the C11 area (Section 9.0 of the VIAR).

In summary, therefore, the statement that ‘... there are no visual impacts upon the heritage items and Pymble Avenue Conservation Area in the vicinity’ (Section 6.2.2 of the HIS) is supported.

3.2 Compatibility with Pymble Ladies' College context

The HIS includes an overview of the siting, scale and design of the proposed new building within the Grey House Precinct (Section 6.2.3). It states that the aim of the development is to 'add a new building to the site which will be identifiably new, and which respectfully responds to the historic buildings which exist on the site, particularly Goodlet House.' In assessing the compatibility of the new building with its context, the HIS asserts that:

The proposal involves the addition of a building with an articulated form that takes advantage of the steep topography of the site, which will reduce the overall bulk of the development, and ensures it does not overpower the reading of more historic buildings on the site, including the nearby Goodlet House.

Comment

The subject property (ie the Grey House Precinct within the broader PLC complex) is not listed as a heritage item, even though the PLC complex contains a number of buildings and spaces that are highly likely to be of heritage significance. Notwithstanding the probable heritage significance of some of these buildings and spaces, the proposed development will replace existing demountable structures within a detached area of the site and be physically separated from significant buildings such as Goodlet House.

The HIS presents no graphic evidence to support the above assessments, and (as noted in Section 2.4 of this peer review report) provides no analysis of the likely heritage values of the PLC complex or the buildings and spaces within its boundaries. However, on the basis of a site inspection and a review of other available documentation, it is reasonable to conclude that the steep topography and location away from significant buildings and spaces would be unlikely to compromise the heritage significance of the Grey House Precinct or the significant building and spaces in this part of the PLC complex.

In summary, the statement that the proposed new building 'is in keeping with the existing setting of the school site' and 'does not impact views of the heritage items in the vicinity' is supported.

3.3 Compliance with controls and guidelines

The HIS includes a section addressing the extent to which the proposed development is compliant with the relevant controls and guidelines for assessing heritage impacts,

particularly the guideline *Statements of Heritage Impact*, the Ku-ring-gai LEP 2015 and Ku-ring-gai DCP 2020.

Comment

The following section is limited to an overview of the content of these more generic sections of the HIS, as the more specific issues are dealt with in the earlier HIS sections.

In regard to the guideline *Statements of Heritage Impact*, the HIS concludes (Section 6.3) that:

- There will be no physical or visual impacts associated with the heritage items in the vicinity ...
- Views to and from the heritage items in the vicinity, and to and from properties located within the Pymble Avenue HCA, will be retained.
- The cultural significance of the Pymble Avenue HCA in the vicinity of the subject site, will be retained and conserved.

Moreover, the steep topography and location of the proposed new building away from significant buildings and spaces would be unlikely to compromise the heritage significance of the Grey House Precinct or the significant building and spaces in this part of the PLC complex.

However, as pointed out in Sections 2.1, 2.2, 2.3 and 2.4 of this peer review report, the research and analysis utilised to formulate these conclusions is in some respects (especially the assessment of heritage significance) not compliant with that required by the guideline, and by other widely utilised and accepted guidelines such as the Burra Charter.

In spite of these qualifications, the HIS's conclusions that the proposal complies with the relevant high-level heritage criteria set out in the Ku-ring-gai LEP 2015 (Section 6.4) and Ku-ring-gai DCP 2020 (Section 6.5) are generally supported.

4 Conclusion and recommendations

4.1 Conclusion

This independent peer review of the HIS, prepared by NBRS (dated 11 August 2021), has been commissioned the NSW DPIE. The HIS has been submitted in relation to a proposed development of the Grey House Precinct within the grounds of the PLC.

The Grey House Precinct, albeit not listed as an item of local significance, is in the vicinity of a HCA and multiple heritage items listed on the Ku-ring-gai LEP 2015.

The key findings of the HIS (Section 7) are as follows:

The proposed removal of the existing demountable buildings and the addition of a new multi-level 'Grey House Precinct' school building and associated landscaping on the site will have no adverse impacts on the setting of the Heritage Conservation Area nor heritage items in the vicinity. The legibility, visibility and amenity of the neighbouring Conservation Area and heritage items in the vicinity will be retained.

Views to and from individual properties located within the Conservation Area in the vicinity, and views to and from heritage items in the vicinity, will also be retained.

As set out in Section 3 of this peer review report, these findings are generally supported. The subject site is physically separated from the individually listed heritage items in the Pymble Avenue HCA by a row of dwellings, with associated mature plantings, which are on allotments that have been subdivided from the original large allotments, the remnants of which constitute the current Pymble Avenue HCA.

The conclusion that key views from outside and within the HCA will not be adversely affected is confirmed by the findings of the separate VIAR prepared by Geoscapes (dated August 2021).

However, despite the validity of the findings of the HIS, the report itself has a number of fundamental flaws and omissions. As pointed out in Sections 2.1, 2.2, 2.3 and 2.4 of this peer review report, the research and analysis utilised to formulate these conclusions is in some respects (especially the historical and physical analysis, and the assessment of heritage significance) inadequate and not compliant with that required by the guideline *Statements of Heritage Impact*, and by other widely utilised and accepted guidelines such as the Burra Charter.

4.2 Recommendations

The SSDA for the PLC Grey House Precinct development is currently being assessed by DPIE. The HIS has been submitted in relation to the proposed development, and this peer review report has been commissioned by DPIE to review the adequacy of the HIS in assessing the potential heritage impacts of the project in response to the SEARs issued by the Secretary.

As set out in Section 4.1 above, the findings of this peer review report are that the proposed development will not result in any substantive impacts on the heritage significance of the Pymble Avenue HCA, the individually listed heritage items within its boundaries, or the (unlisted) significant buildings and spaces within the broader PLC complex.

In terms of potential heritage impacts, therefore, there would be no objection to the SSDA being approved. Moreover, given the findings of the peer review, there would be no requirement to impose consent conditions to avoid or mitigate any impacts on heritage significance.