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A No's:17500 & 17513 File No. 12/17266

Mr Chris Ritchie A/Director Industry, Social Projects and Key Sites Department of Planning & Infrastructure GPO Box 39 SYDNEY NSW 2001

Attention: Ms Jane Flanagan

Dear Ms Flanagan,

## Exhibition of Modification Request - Pitt Town Concept Plan MPA07\_0140 MOD3

Thank you for advising the Heritage Division of the exhibition of the exhibition of the modification of the Pitt Town Concept Plan.

The following comments are provided to assist the Department in its consideration of the modification of the Pitt Town Concept Plan.

It is noted that the modification seeks approval to modify the Pitt Town Concept Plan in respect of Lot 12 DP 1021340 in the Blighton Precinct to obtain concept plan approval for subdivision into 11 rural housing lots and 1 public reserve lot with a revised internal road configuration. The proposed rural housing lots range in size from 4,000m2 to 3.02 hectares in area.

The subject land includes part of Governor Bligh's Model Farm "Blighton" and one of the earliest model farms in NSW. It was established by Governor Bligh as a venture to yield capital for his personal gain as an exemplar for the most efficient means of undertaking agricultural production in a new land. Bligh is a figure of undisputable historical importance in Australian history.

The subject land forms part of the Pitt Town Conservation Area identified in Schedule 5 of the Hawkesbury Local Environmental Plan 2012 (refer Hawkesbury Local Environmental Plan 2012 Heritage Map Sheet HER \_008C).

The subject land also forms part of a Potential Archaeological Site and Potential Place of Aboriginal Heritage Significance (refer Hawkesbury Local Environmental Plan 2012 Pitt Town Heritage Map PTH\_008C) referred to in Clause 6.9 of Hawkesbury Local Environmental Plan 2012.

Governor Bligh's Model Farm "Blighton" is not currently listed on the State Heritage Register.

The Section 75W Modification Assessment Report prepared by Glenn Falson Urban and Rural Planning Consultant dated September 2013 states that a Statement of Heritage Impact is not required at this subdivision stage because the site has been the subject of previous studies including those relating to heritage matters (page 14).

The Heritage Division does not support the view expressed in the report. The Heritage Division believes that it is critical that a Statement of Heritage Impact be prepared for the subject land because archaeological testing under a permit by the Department of Environment and Conservation has indicated the presence of an intact Aboriginal archaeological landscape of considerable antiquity in the northern portion of Lot 11 and 12 and Lots 14-16.

Given these findings, the Heritage Division believes that a Statement of Heritage Impact is required to synthesise the conclusions of previous studies and demonstrate how the conclusions have been recognised or will be managed by proposed development.

Any Statement of Heritage Impact that is prepared for the subject land should clearly identify its heritage significance, assess the impact of proposed development including subdivision and subsequent development that involves the excavation of land (dwellings, outbuildings, driveways and swimming pools) on the heritage significance of the subject land and identify how the impact of the proposed development on any relic and or Aboriginal object or Aboriginal archaeological landscape may be mitigated. The Statement should also consider the impact of proposed development on the views and vistas of adjacent heritage items such as "The Manse" located in Punt Road.

The Heritage Division further considers it important that proposed development on the subject land both recognises and appropriately interprets the heritage significance of both "Blighton" and the intact Aboriginal archaeological landscape.

Please contact Alice Brandjes on (02) 9873 8560 or alice.brandjes@heritage.nsw.gov.au if you have any further enquiries in this matter.

Yours sincerely

**Edmund Beebe** 

A/Manager Conservation Team

Heritage Division

Office of Environment & Heritage

AS DELEGATE OF THE NSW HERITAGE COUNCIL