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**URBIS**

# **HERITAGE IMPACT STATEMENT**

42 Raymond Avenue  
Matrville

Prepared for

**HALE CAPITAL PARTNERS**

3 March 2022

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# CONTENTS

<b>Executive Summary</b> .....	<b>1</b>
Conclusions .....	1
Recommendations .....	1
<b>1. Introduction</b> .....	<b>3</b>
1.1. Background .....	3
1.2. Site Location .....	3
1.3. Heritage Listing .....	4
1.4. Methodology .....	4
1.5. Author Identification .....	4
1.6. The Proposal.....	5
<b>2. Site Description</b> .....	<b>9</b>
2.1. The Setting.....	9
2.2. The Subject Site.....	10
<b>3. Historical Overview</b> .....	<b>11</b>
3.1. Area History .....	11
3.2. Site History.....	12
3.3. Property Owners .....	18
<b>4. Heritage Significance</b> .....	<b>20</b>
4.1. What is Heritage Significance? .....	20
4.2. Significance Assessment.....	20
4.3. Statement of Significance .....	24
4.3.1. Subject Site .....	24
4.3.2. Bunnerong Stormwater Channel No 11 .....	24
<b>5. Built Heritage Impact Assessment</b> .....	<b>25</b>
5.1. Statutory Controls .....	25
5.2. NSW Heritage Guidelines .....	25
<b>6. Historical Archaeology</b> .....	<b>28</b>
6.1. Framework for Assessment .....	28
6.2. Archaeological Potential .....	28
<b>7. Conclusion and Recommendations</b> .....	<b>30</b>
Recommendations .....	30
<b>Disclaimer</b> .....	<b>31</b>

## FIGURES

Figure 1 Locality map with the subject site outlined in red. ....	3
Figure 2 Extract of curtilage plan for the Bunnerong Stormwater Channel No 11 in magenta and subject site in red.....	4
Figure 3 Extract from Warehouse GF Plan. ....	7
Figure 4 Warehouse Level 1 Floor Plan.....	7
Figure 5 Extract from Elevations. ....	8
Figure 6 Extract from Elevations. ....	8
Figure 7 View east along Raymond Avenue. ....	9
Figure 8 View north-east along Raymond Avenue.....	9

Figure 9 View north-east towards subject site from Botany Road. ....	9
Figure 10 Example of neighbouring warehouse development. ....	9
Figure 11 View of subject site from Raymond Avenue. ....	10
Figure 12 Recent aerial imagery of subject site, October 2021. Former warehouse has been demolished. ....	10
Figure 13 Extract from land title dated September 1875. ....	13
Figure 14 Extract from land title dated 1882. ....	14
Figure 15 Extract from land title dated September 1899. ....	14
Figure 16 Bunnerong Estate, allotments for sale February 1916. ....	14
Figure 17 Extract from land title dated August 1942. ....	15
Figure 18 1943 aerial imagery of subject site. Approximate boundaries indicated in red. Bunnerong Stormwater channel indicated in blue. ....	15
Figure 19 Extract from land title dated 1951. ....	16
Figure 20 1955 aerial imagery of subject site. Approximate boundaries indicated. ....	16
Figure 21 1971 aerial imagery of subject site. Approximate boundaries indicated. ....	16
Figure 22 1977 aerial imagery of subject site. Approximate boundaries indicated. ....	17
Figure 23 1982 aerial imagery of subject site. Approximate boundaries indicated. ....	17
Figure 24 1986 aerial imagery of subject site. Approximate boundaries indicated. ....	17
Figure 25 1991 aerial imagery of subject site. Approximate boundaries indicated. ....	17
Figure 26 1994 aerial imagery of subject site. Approximate boundaries indicated. ....	17
Figure 27 1998 aerial imagery of subject site. Approximate boundaries indicated. ....	17
Figure 28 2005 aerial imagery of subject site. Approximate boundaries indicated. ....	18
Figure 29 2010 aerial imagery of subject site. Approximate boundaries indicated. ....	18
Figure 30 2015 aerial imagery of subject site. ....	18
Figure 31 2020 aerial imagery of subject site. ....	18

## TABLES

Table 1 Provided Plans. ....	5
Table 2 Property Owners. ....	18
Table 3 Assessment of Heritage Significance. ....	20
Table 4 Heritage NSW Guidelines. ....	25

# EXECUTIVE SUMMARY

Urbis has been engaged by Hale Capital Partners ('Hale') to prepare the following Heritage Impact Statement (HIS) for 42 Raymond Avenue Matraville (subject site) as part of a State Significant Development Application (SSDA) for construction of a two-storey warehouse and distribution centre comprising 19,460 m<sup>2</sup> GFA including ancillary office space, landscaping, bicycle and car parking.

The subject site is not a listed heritage item. It does, however, adjoin the Bunnerong Stormwater Channel No 11, which is identified as a heritage item on Sydney Water's State Agency *Section 170 Heritage & Conservation Register* (item no. 4570016).

This Heritage Impact Statement has been prepared to satisfy the Planning Secretary's Environmental Assessment Requirements for application SSD-31552370, in relation to *Aboriginal Cultural Heritage* (18.) and *Environmental Heritage* (19.)

The proposal generally aligns with the intentions and heritage related provisions of the *Randwick Local Environmental Plan 2012*, the *Randwick Development Plan 2013* and the NSW Heritage Guidelines for Statements of Heritage Impact.

## Conclusions

The assessment carried out in this report confirms the following:

- **Built Heritage** – The proposed development at the subject site is assessed to have no adverse impact on the Bunnerong Stormwater Channel No 11, as an item listed on Sydney Water's State Agency *Section 170 Heritage and Conservation Register* under the *Heritage Act 1977*.
- **Historical Archaeology** – Based on the high level of ground disturbance associated with the construction of the extant buildings and infrastructure, the site is assessed as having low historical archaeological potential.

For the reasons stated above, the proposed works are recommended for approval from a heritage perspective having regard to the proposed recommendations below.

## Recommendations

It is recommended that no further historical archaeological investigation need be undertaken prior to works within the site and that the development may proceed with caution, subject to the following archaeological chance finds and human remains procedures being implemented and followed:

### Archaeological Finds Procedure

Should any archaeological deposits be uncovered during any site works, the following steps must be followed:

1. All works within the vicinity of the find must immediately stop. The find must not be moved 'out of the way' without assessment.
2. The site supervisor or another nominated site representative must contact either the project archaeologist (if relevant) or Heritage NSW (Enviroline 131 555) to contact a suitably qualified archaeologist.
3. The nominated archaeologist must examine the find, provide a preliminary assessment of significance, record the item and decide on appropriate management measures. Such management may require further consultation with Heritage NSW and preparation of a research design and archaeological investigation/salvage methodology.
4. Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required and further archaeological investigation undertaken.
5. Reporting may need to be prepared regarding the find and approved management strategies.
6. Works in the vicinity of the find can only recommence upon receipt of approval from Heritage NSW.

### Human Remains Procedure

In the unlikely event that human remains are uncovered during the proposed works, the following steps must be followed:

1. All works within the vicinity of the find must immediately stop. The find must be cordoned-off and signage installed to avoid accidental impact.
2. The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW (Enviroline 131 555).
3. The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.
4. Management recommendations are to be formulated by the NSW Police, Heritage NSW and site representatives.
5. Works are not to recommence until the find has been appropriately managed.

# 1. INTRODUCTION

## 1.1. BACKGROUND

Urbis has been engaged by Hale Capital Partners ('Hale') to prepare the following Heritage Impact Statement (HIS) for 42 Raymond Avenue Matraville (subject site) as part of a State Significant Development Application (SSDA) for construction of a two-storey warehouse and distribution centre comprising 19,460 m<sup>2</sup> GFA including ancillary office space, landscaping, bicycle and car parking.

This Heritage Impact Statement has been prepared to satisfy the Planning Secretary's Environmental Assessment Requirements for application SSD-31552370, in relation to *Aboriginal Cultural Heritage* (18.) and *Environmental Heritage* (19.)

The subject site is not a listed heritage item. It does, however, adjoin the Bunnerong Stormwater Channel No. 11, which is identified as a heritage item on Sydney Water's Section 170 Heritage & Conservation Register (item no. 4570016). It has been identified that minor works to the Bunnerong Stormwater Channel No. 11 are required to ensure appropriate drainage infrastructure.

Further details of the proposed works are included in Section 1.6. This HIS has been prepared to determine the potential heritage impact of the proposed works on the Bunnerong Stormwater Channel.

## 1.2. SITE LOCATION

The subject site is located at 42 Raymond Avenue Matraville within the local government area (LGA) of the City of Randwick. The site is legally described as Lot 1 in Deposited Plan 369888, Lot 32 Sec B Deposited Plan 8313, Lot 1 Deposited Plan 511092 and Lot 2 in Deposited Plan 1082623.



Figure 1 Locality map with the subject site outlined in red.

Source: SIX Maps 2021

### 1.3. HERITAGE LISTING

The subject site is not a listed heritage item. It does, however, adjoin the Bunnerong Stormwater Channel No 11 which is identified as a heritage item on Sydney Water’s Section 170 Heritage & Conservation Register (Item 4570016).

This heritage item is the storm water canal which extends along the subject area’s north-western boundary. The subject area is not located within the vicinity of any heritage items listed on an Environmental Planning Instrument or the NSW State Heritage Register.

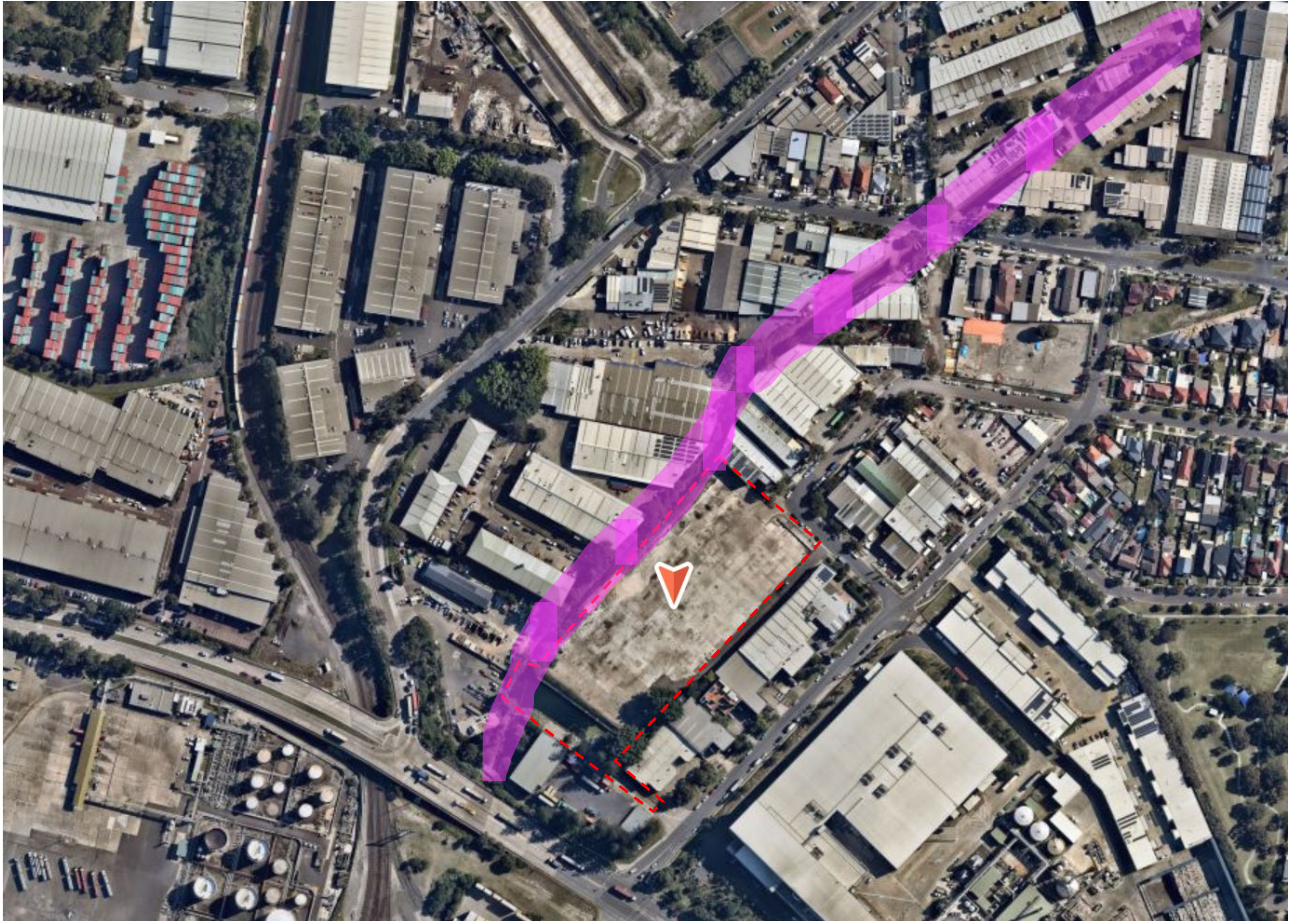


Figure 2 Extract of curtilage plan for the Bunnerong Stormwater Channel No 11 in magenta and subject site in red.

Source: Sydney Water S.170

### 1.4. METHODOLOGY

This Heritage Impact Statement has been prepared in accordance with the Heritage NSW guidelines ‘Assessing Heritage Significance’, and ‘Statements of Heritage Impact’. The philosophy and process adopted is that guided by the Australia ICOMOS Burra Charter 1999 (revised 2013).

### 1.5. AUTHOR IDENTIFICATION

The following report has been prepared by Annabelle Cooper (Consultant | Built Heritage) and Aaron Olsen (Consultant | Archaeology). Ashleigh Persian (Associate Director | Heritage) and Balazs Hansel (Associate Director | Archaeology) have reviewed and endorsed its content.

Unless otherwise stated, all drawings, illustrations and photographs are the work of Urbis.

## 1.6. THE PROPOSAL

The proposal entails the construction of a two-storey warehouse and distribution centre comprising 19,460 m<sup>2</sup> GFA including ancillary office space, landscaping, bicycle and car parking, as detailed below:

The proposal comprises the redevelopment of the site as follows:

- Construction, fit out and operation of a two-storey warehouse and distribution centre comprising approximately 19,460 m<sup>2</sup> GFA including:
  - 17,789 m<sup>2</sup> of warehouse and distribution GFA; and
  - 1,671 m<sup>2</sup> GFA ancillary office space.
- Provision of 11 bicycle parking spaces and 101 car parking spaces at ground.
- Approximately 2,250 m<sup>2</sup> of hard and soft landscaping at ground.
- Provision of one additional access crossover from Raymond Avenue.
- Provision of internal vehicle access route and loading docks.
- Upgrades to existing on-site infrastructure.
- Building identification signage.
- Operation 24 hours per day seven days per week.

### Works to Bunnerong Stormwater Channel No. 11

It has been identified that the existing in-ground drainage located on the subject site is not suitable for the proposed development. As such, it is required to create a new connection point in the Bunnerong Stormwater Channel No. 11 to facilitate stormwater discharge into the asset.

Proposed works to the Bunnerong Stormwater Channel include the following:

- Demolition of the channel wall to a width that facilitates construction of the outlet pipe;
- Laying of concrete pipe (sizing to be confirmed as part of detailed design);
- Backfilling of pipe with select granular fill; and
- Reconstruction and make good works including grouting/sparging to create a smooth interface.

Urbis has been provided with drawing documentation prepared by SBA Architects. This HIS has relied on these plans for the impact assessment include in Section 5. Extracts of the proposed plans are also provided overleaf. Full size plans should be referred to for detail.

Table 1 Provided Plans

Author	Drawing No.	Drawing Name	Revision	Date
SBA Architects	DA000	Cover page	E	01.03.22
SBA Architects	DA010	3D View 1 – Day Perspective	E	01.03.22
SBA Architects	DA011	3D View 2 – Evening Perspective	E	01.03.22
SBA Architects	DA012	3D View 3 – Street Frontage	E	01.03.22
SBA Architects	DA013	3D View 4 – Aerial Views	E	01.03.22
SBA Architects	DA014	3D Section	E	01.03.22

SBA Architects	DA050	Site Analysis Plan & Summary	F	01.03.22
SBA Architects	DA100	Warehouse GF Plan	F	01.03.22
SBA Architects	DA101	Warehouse GF Mezz Plan	E	01.03.22
SBA Architects	DA102	Warehouse Level 1 Floor Plan	E	01.03.22
SBA Architects	DA103	Warehouse Level 1 Mezz Floor	D	16.12.21
SBA Architects	DA104	Warehouse Roof Plan	F	01.03.22
SBA Architects	DA200	Office 01 Floor Plans	D	16.12.21
SBA Architects	DA201	Office 02 Floor Plans	E	01.03.22
SBA Architects	DA202	Office 03 Floor Plans	E	01.03.22
SBA Architects	DA203	Office 04 Floor Plans	E	01.03.22
SBA Architects	DA300	Elevations	C	30.11.21
SBA Architects	DA310	Sections	D	16.12.21
SBA Architects	DA401	Shadow Diagram	D	16.12.21
SBA Architects	DA500	Signage Details	C	30.11.21
SBA Architects	DA600	GFA Calculations	A	04.11.21
SBA Architects	DA601	Relationship to Existing Setting	A	04.11.21

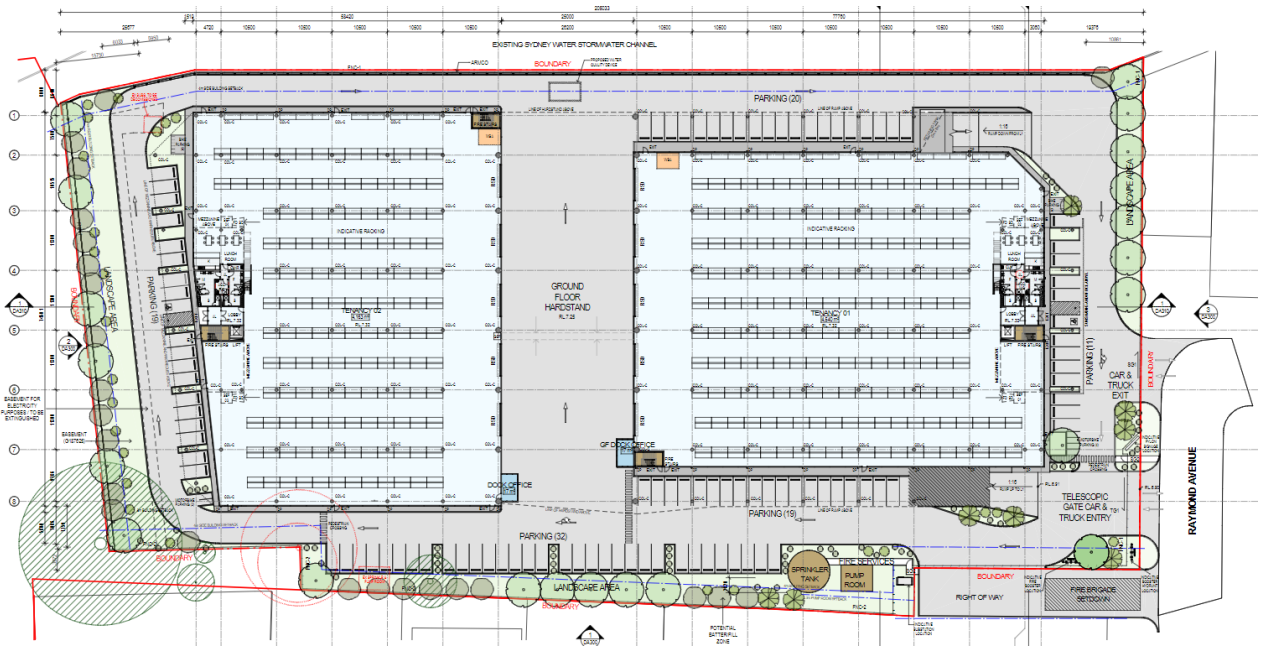


Figure 3 Extract from Warehouse GF Plan.

Source: SBA Architects

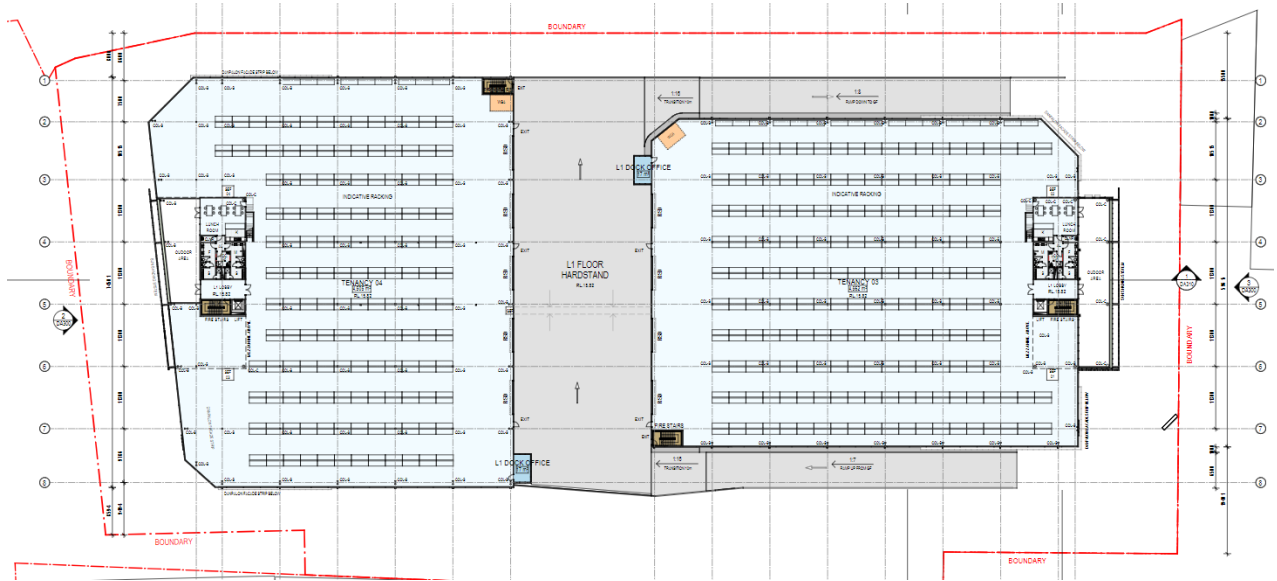


Figure 4 Warehouse Level 1 Floor Plan.

Source: SBA Architects

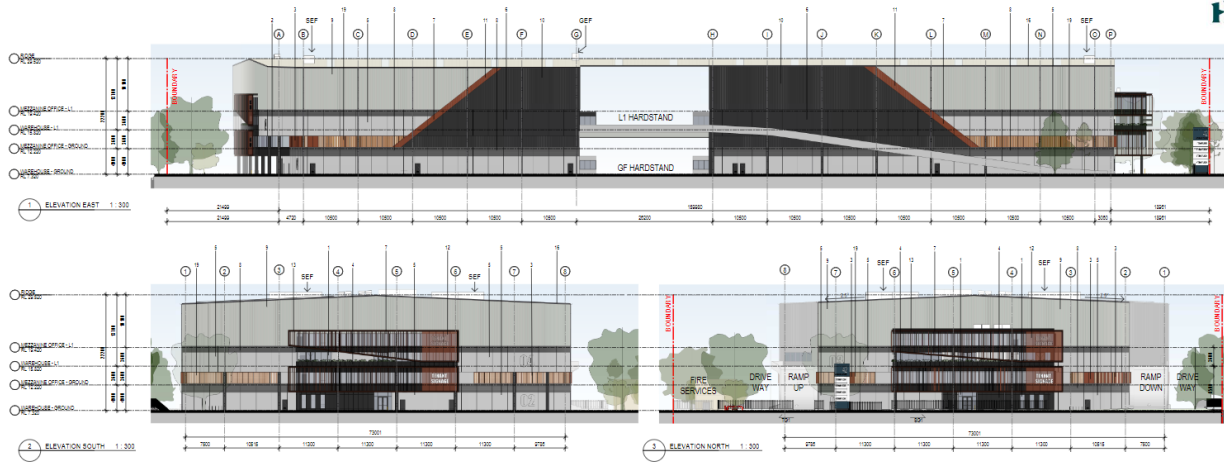


Figure 5 Extract from Elevations.

Source: SBA Architects

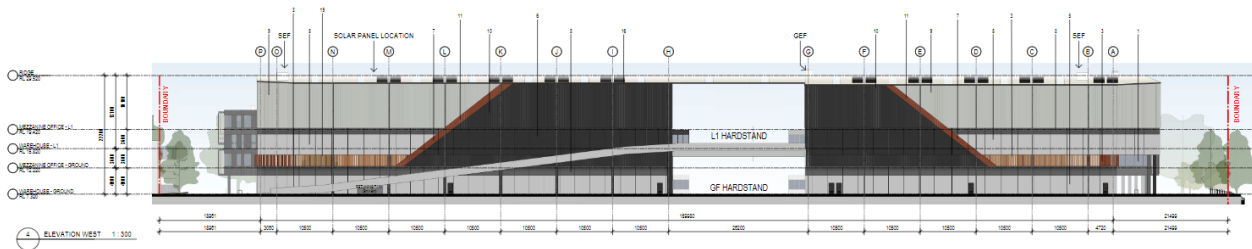


Figure 6 Extract from Elevations.

Source: SBA Architects

## 2. SITE DESCRIPTION

### 2.1. THE SETTING

The subject site is located north of Botany Road between Beauchamp Road and McCauley Street, Matraville. Raymond Avenue is accessed via McCauley Street. The area is dominated by industrial facilities and warehousing. The subject site is north of Port Botany. East of the subject site towards Purcell Park is a low scale residential area. The lots either side of the subject site are occupied by warehousing. Raymond Avenue contains on-street parking along either side of the road. Many of the allotments have driveway access and ample off-street parking. Many of the warehouses along Raymond Avenue are mid-late-century developments.



Figure 7 View east along Raymond Avenue.

Source: Google Streetview



Figure 8 View north-east along Raymond Avenue.

Source: Google Streetview



Figure 9 View north-east towards subject site from Botany Road.

Source: Google Streetview



Figure 10 Example of neighbouring warehouse development.

Source: Google Streetview

## 2.2. THE SUBJECT SITE

The subject site is currently a large, undeveloped vacant lot. The lot contains a sizeable hardstand area which occupies majority of the allotment. At the southern end of the allotment is a modest body of water that marks the end of the stormwater channel.

The Bunnerong Stormwater Channel No 11 adjoins the north-western boundary of the subject site. Bunnerong Stormwater Channel No 11 extends to the north, passing under Perry Street and to the south, underneath Botany Road. The stormwater channel is not visible from the public domain (Raymond Avenue), as it passes behind adjacent warehouse buildings. The north-western boundary of the site is vegetated, alongside the stormwater channel.



Figure 11 View of subject site from Raymond Avenue.

Source: Google Streetview

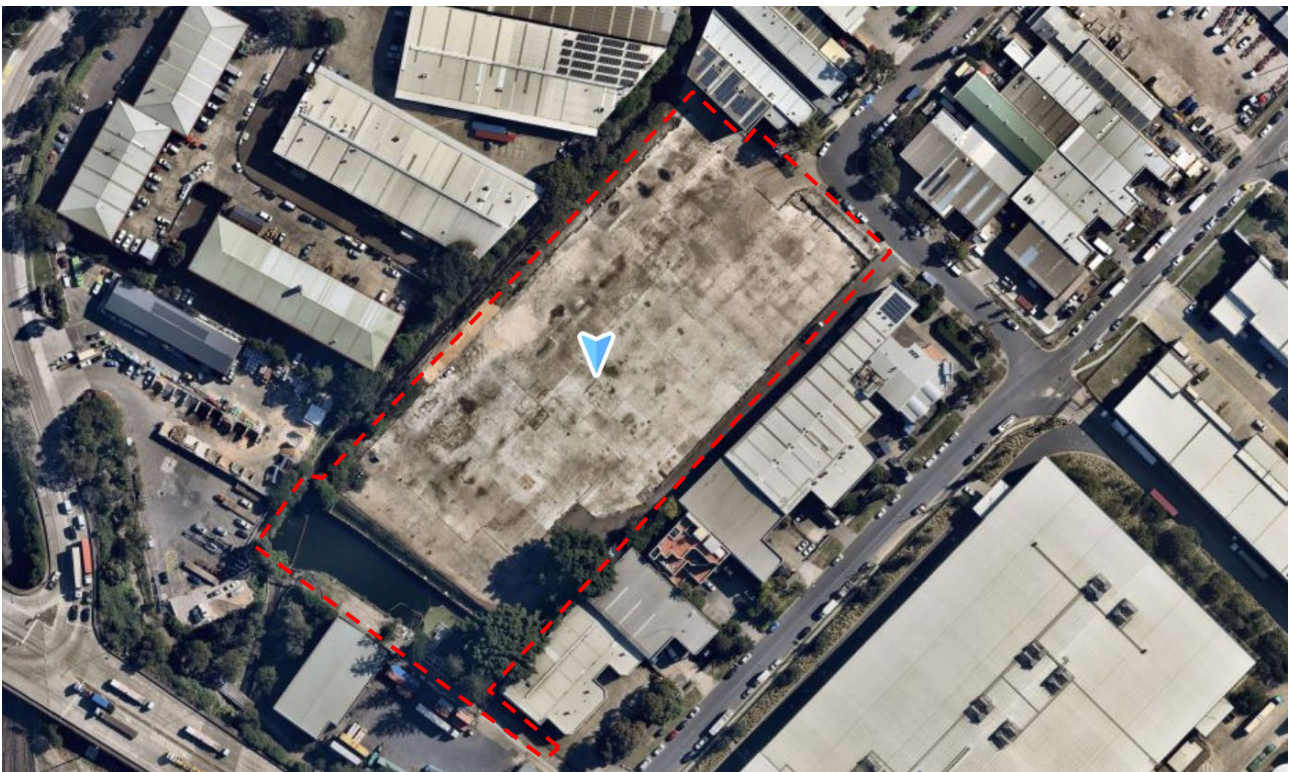


Figure 12 Recent aerial imagery of subject site, October 2021. Former warehouse has been demolished.

Source: Nearmap 2021

## 3. HISTORICAL OVERVIEW

### 3.1. AREA HISTORY

The following historical account has been reproduced from the Dictionary of Sydney, contributed by Paul Ashton, 2008.

*The suburb of Matraville was once principally swamps and sandhills, part of the Botany, Veterans' and Lachlan swamps system which, draining into Botany Bay, provided a significant part of Sydney's water supply in the middle portion of the nineteenth century.*

*From the 1830s, marshy parts of the watershed became sites of market gardening. Around 1840, Alexander Marjoribanks, a visitor to the colony, observed that these areas were "uncommonly fertile, producing vegetables with the exception of potatoes, sufficient to supply [Sydney] town"<sup>1</sup>.*

*By the 1860s, most market gardening had concentrated on and around the rich fringes of Veterans' Swamp which took in most of Matraville. At this time, Chinese returning from the goldfields began market gardening on leases of crown land. They came to dominate this activity in the district. It is a historical coincidence that James Matra, after whom Matraville was named, had in 1785 suggested to the British government that Chinese labourers could be introduced into the colony of New South Wales.*

#### **Matraville Garden Village**

*In 1917 Dr Richard Arthur and others managed to have the Voluntary Workers (Soldiers' Holdings) Act passed through the New South Wales parliament. This provided the Voluntary Workers Association (VWA) with 40 acres (16.2 hectares) of crown land at Matraville. There the VWA planned a model garden village, based on Port Sunlight in England, for disabled servicemen and war widows. It was constructed between January 1918 and the end of 1921 as one of two major projects undertaken by the VWA.*

*Surrounded by a few houses and buildings and some scrubby hillocks, the site was an elevated, sandy wasteland on the fourth section of the La Perouse tramline along Anzac Parade in the relatively poor municipality of Botany<sup>2</sup>.*

*In many ways it was an abandoned place. The site had nothing much to recommend it except emptiness. It was often claimed to be near other places of some appeal – Maroubra Junction, just over a kilometre away to the north-east, and not much further east, Maroubra Beach. There were also a number of forsaken souls living in iron humpies in the scrub around the site.*

*Ostensibly inspired by a debt of honour to fallen and wounded servicemen in World War I, the Matraville Garden Village was held up as both a significant artefact of the war and a model of wholesome suburban living. Promoters of the village tirelessly asserted that the 'best memorial to our fallen heroes is a comfortable little home for his widow and children on which a memorial stone can be placed'<sup>3</sup>. But the project quickly became the object of both humour and scorn.*

*Allegations of corruption and mismanagement were levelled at the VWA, and in particular Arthur and his colleague TJ Ley. Subsequently a Board of Control was established in 1918 to manage the village and in 1923 the New South Wales Public Trustee took control.*

*Amenities in the village were inadequate. Different levels of government bickered over the provision of infrastructure. Rents were raised, many residents fell into arrears and in 1926 the*

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<sup>1</sup> FA Larcombe, *The History of Botany 1788–1970*, Botany Council, Sydney, 1970, p 13.

<sup>2</sup> FA Larcombe, *The History of Botany 1788–1970*, Botany Council, Sydney, 1970, p 55.

<sup>3</sup> Richard Arthur, circular letter to Voluntary Workers' Association Branches, 1 May 1919, p 2, in Richard Arthur Papers, State Library of NSW, Mitchell Library manuscript 473, box 6

*Public Trustee attempted unsuccessfully to evict a widow. The court case attracted significant attention in the press.*

*By the close of 1926, roads at the settlement were said to be 'almost impassable'. Dilapidated homes remained unrenovated; the church hall was marked for demolition; and tendered maintenance work was reported to be 'done disgracefully'. Fresh paint was found peeling off ceilings before it had time to dry. This, at any rate, was how the village was described by the Matraville Sailors' and Soldiers' Garden Village Welfare Association in its last recorded report to the Minister for Justice on 1 January 1927.<sup>4</sup>*

*Only 93 of the 170 cottages planned for Matraville were built<sup>5</sup>. And while conditions in the village improved old difficulties continued. Eventually, in 1954, the Public Trustee recommended that: "as a result of the experience gained during the administration of this village for over thirty years, it is felt that the increasing problems... might be permanently solved by a transfer of the ownership of the cottages to eligible occupants..."<sup>6</sup>*

### **Public Housing**

*A crisis in state public housing in the early 1970s led the Askin Liberal Government to introduce a Bill into Parliament to amend the Voluntary Workers (Soldiers' Holdings) Act and transfer the settlement to the Housing Commission<sup>7</sup>. A slow process of demolition began in mid-1975<sup>8</sup>.*

*The soldiers' garden village was replaced by 440 Housing Commission flats. Only one home – a cottage at 6 Amiens Crescent – and the public school (opened in 1927) survived. Their retention was secured on the grounds of heritage value. They were, as Bob Carr, Minister for Planning and the Environment in the Wran Labor Government at the time, put it, the only remaining "tangible evidence of... the most significant social project of the immediate post-WWI period"<sup>9</sup>.*

*The last market gardens were closed in 1979 when leases were rescinded for works associated with the Housing Commission<sup>10</sup>. One survives and has a state heritage listing. Today, Matraville comprises around 3300 residential dwellings.*

## **3.2. SITE HISTORY**

The area that makes up the subject site was originally awarded to Thomas Beverly Hall and James Rothwell by Crown grant in 1856.

In September 1875, the land was sold to John Goddes as part of a large group of land holdings. In 1882, a portion of these holdings was purchased by John Walsh. In May 1899, a portion of this parcel was transferred to Aurora Matilda Amati. The stormwater channel is marked on an 1875 block plan (Figure 13).

In 1916, the area around Raymond Avenue was subdivided into smaller lots close to the road as part of the Bunnerong Estate. The land beyond these lots bound by Perry Street (north), Botany Road (south) and Long Bay Road (west) remained as a single, larger lot with some early industry indicated at Figure 16.

In May 1923, Alfred Charles Barnes purchased the area at the front of the site near Raymond Avenue (Lot 31). In February 1928 the land marked "Portion 164 of Parish" was purchased by Australian Paper

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<sup>4</sup> Matraville Sailors' and Soldiers' Garden Village Welfare Association to WJ McKell, 1 January 1927, Archives Office of NSW file 12/1297.1

<sup>5</sup> Paul Ashton, 'Repatriation Homes: Matraville Garden Village for Disabled Soldiers and War Widows', *Journal of Australian Studies*, no 60, pp 73–83.

<sup>6</sup> Under Secretary, Department of Attorney General and of Justice, Ministerial Minute, 10 August 1959.

<sup>7</sup> *Sydney Morning Herald*, 20 June 1973, p 7.

<sup>8</sup> *Messenger*, 7 May 1975.

<sup>9</sup> *Messenger*, 18 September 1985; KS Gordon (General Manager, Construction and Development, Department of Housing) to the Town Clerk, Randwick, 24 April 1986, State Records NSW 12/1297.1

<sup>10</sup> Randwick Municipal Council, *Randwick: A Social History*, University of New South Wales Press, Sydney, 1989, p 159; Shirley Fitzgerald, *Red Tape, Gold Scissors*, State Library of NSW Press, Sydney, 1997, p 18.

Manufacturers Limited. This would later make up the majority of the subject site. By 1942, both allotments were under the ownership of Australian Paper Manufacturers Limited. By December 1951, the land had been further subdivided to create the allotment which is now reflected by the subject site. The site was owned by Fibre Containers Pty Limited.

In 1943, the site remained largely undeveloped with the exception of a few structures (Figure 18). By 1955, aerial imagery indicates a large warehouse had been developed on the site. Development on the subject site remained unchanged over the mid-to-late 20<sup>th</sup> century. The warehousing was demolished in 2021<sup>11</sup>.

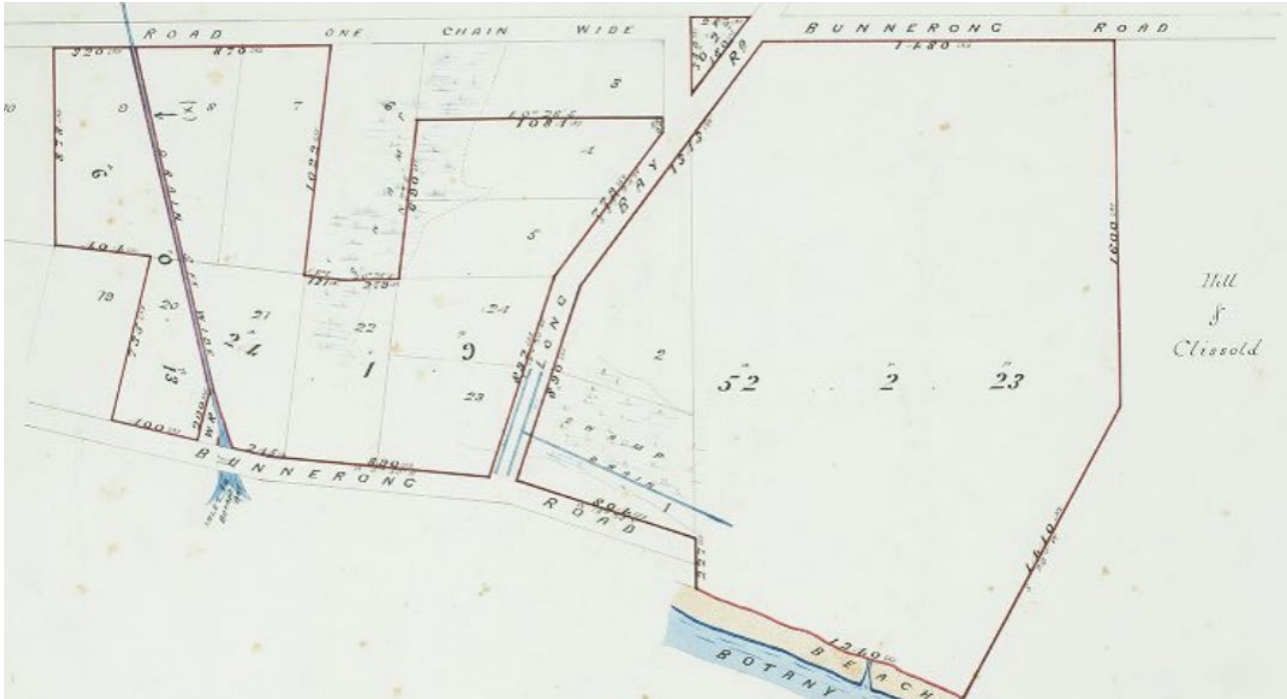


Figure 13 Extract from land title dated September 1875.

Source: NSW HLRV

<sup>11</sup> Aerial Imagery 2021, Nearmap 2021.

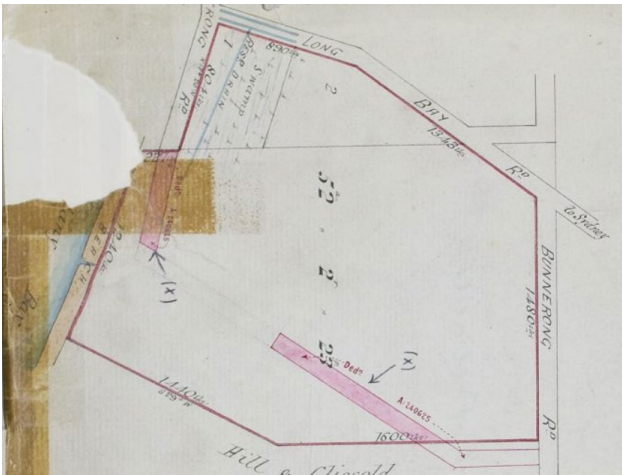


Figure 14 Extract from land title dated 1882.

Source: NSW HLRV

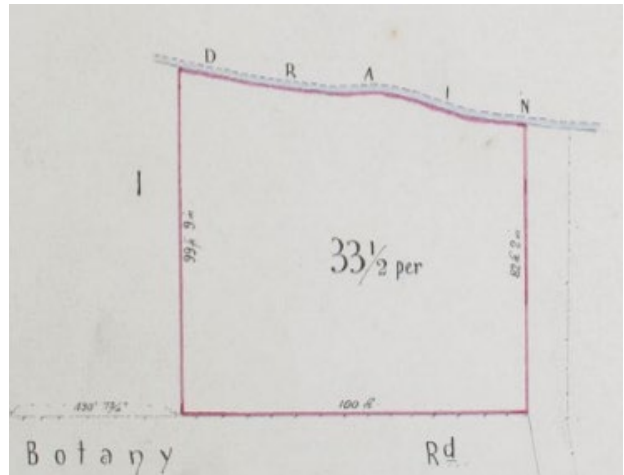


Figure 15 Extract from land title dated September 1899.

Source: NSW HLRV

## BUNNERONG ESTATE RANDWICK

**TORRENS TITLE**

*Close to the BAYS YARRA, LONG & LA PEROUSE*  
For Auction Sale on the Ground at **3 P.M.** on  
**SATURDAY 26<sup>TH</sup> FEB: 1916**  
**RAINE & HORNE** 70 PITT ST } Auctioneers  
**ALLEN & ALLEN** 135 PITT ST } in conjunction

**TERMS**  
£2 Deposit on each Lot.  
Balance in Monthly payments  
of £1 each.  
Interest at 5%.

Messrs J.A.I. Perry Bent & Co  
62 Hunter St Sydney  
Solicitors to the Estate

Shaded Lots are Sold

NOTE: - All measurements are subject to Deposited Plan

*John Miller & Co*  
Licensed Surveyors under R.P. Act.  
Royal Chambers  
3 Castlereagh St Sydney

Figure 16 Bunnerong Estate, allotments for sale February 1916.

Source: State Library of NSW

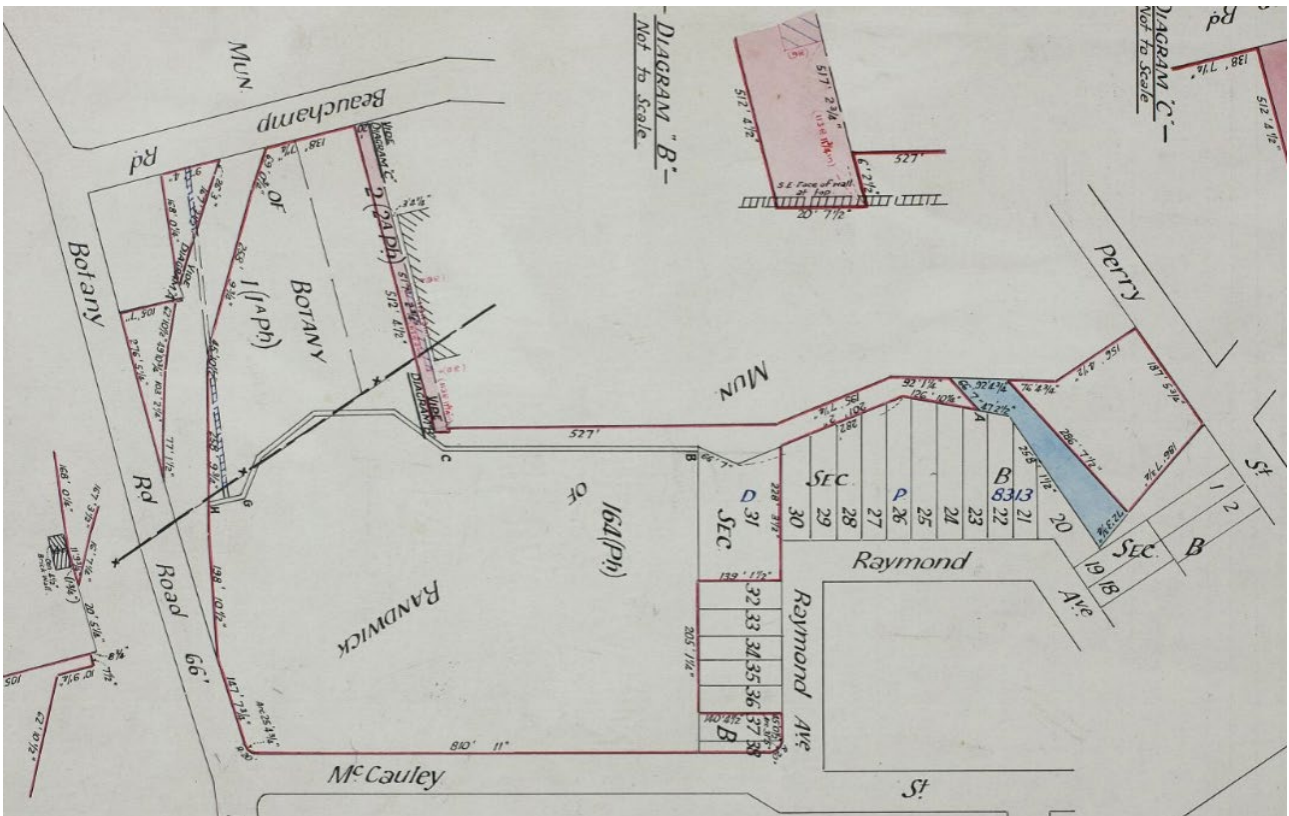


Figure 17 Extract from land title dated August 1942.

Source: NSW HLRV

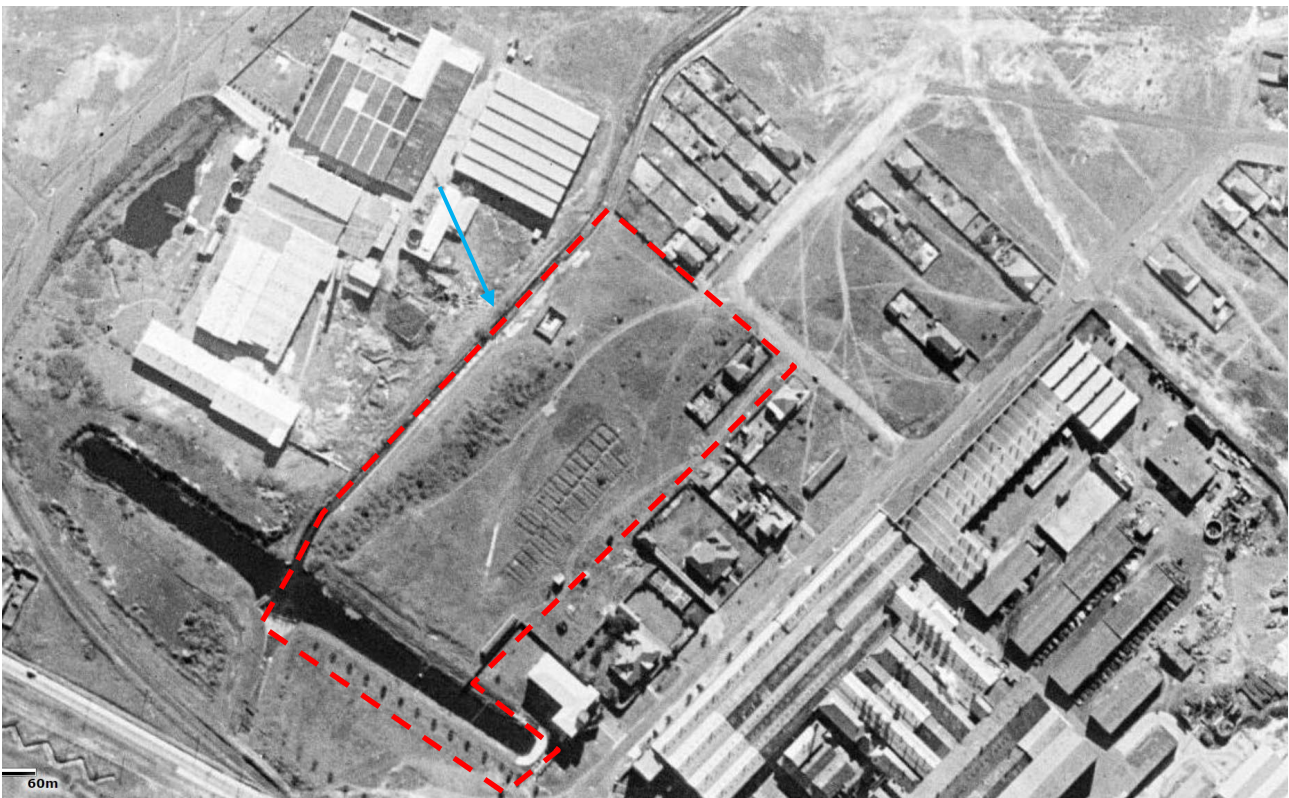


Figure 18 1943 aerial imagery of subject site. Approximate boundaries indicated in red. Bunnerong Stormwater channel indicated in blue.

Source: SIX Maps 2021

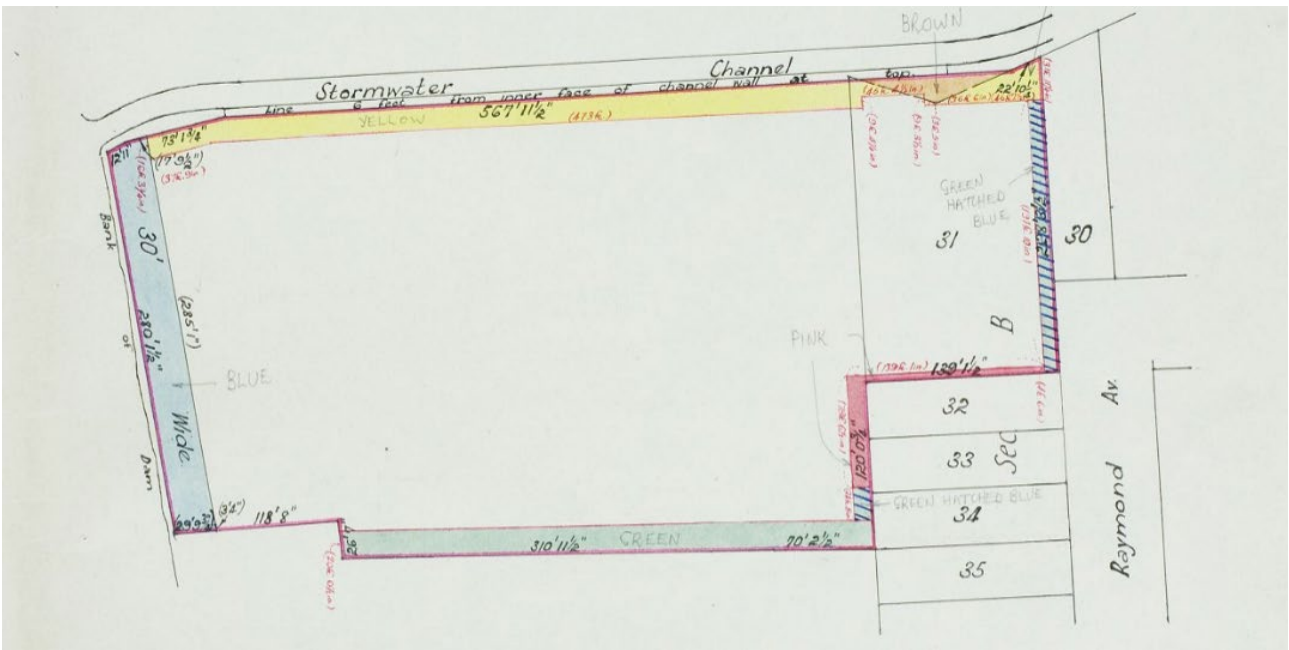


Figure 19 Extract from land title dated 1951.

Source: NSW HLRV



Figure 20 1955 aerial imagery of subject site. Approximate boundaries indicated.

Source: NSW Historical Imagery



Figure 21 1971 aerial imagery of subject site. Approximate boundaries indicated.

Source: NSW Historical Imagery

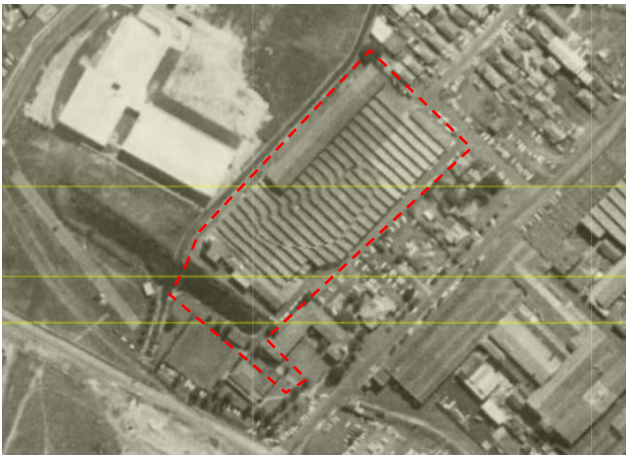


Figure 22 1977 aerial imagery of subject site. Approximate boundaries indicated.

Source: NSW Historical Imagery



Figure 23 1982 aerial imagery of subject site. Approximate boundaries indicated.

Source: NSW Historical Imagery



Figure 24 1986 aerial imagery of subject site. Approximate boundaries indicated.

Source: NSW Historical Imagery



Figure 25 1991 aerial imagery of subject site. Approximate boundaries indicated.

Source: NSW Historical Imagery



Figure 26 1994 aerial imagery of subject site. Approximate boundaries indicated.

Source: NSW Historical Imagery



Figure 27 1998 aerial imagery of subject site. Approximate boundaries indicated.

Source: NSW Historical Imagery



Figure 28 2005 aerial imagery of subject site. Approximate boundaries indicated.

Source: NSW Historical Imagery



Figure 29 2010 aerial imagery of subject site. Approximate boundaries indicated.

Source: NSW Historical Imagery

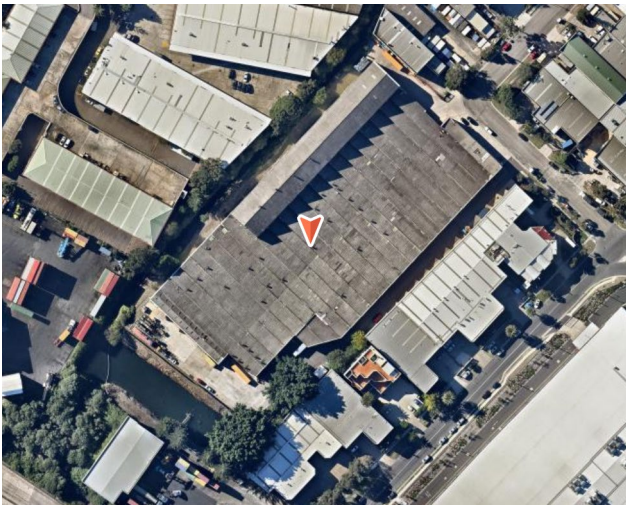


Figure 30 2015 aerial imagery of subject site.

Source: NSW Historical Imagery

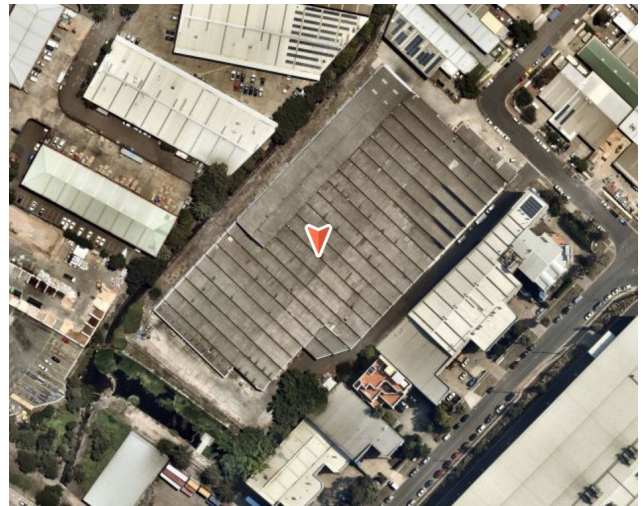


Figure 31 2020 aerial imagery of subject site.

Source: NSW Historical Imagery

### 3.3. PROPERTY OWNERS

Table 2 Property Owners

Date	Owner	Reference
January 1856	Thomas Beverly Hall & James Rothwell	Crown grant
September 1875	John Goddes	Vol: 231 Fol: 127
September 1882	John Walsh	Vol: 596 Fol: 200
May 1899	Aurora Matilda Amati	Vol: 1280 Fol: 205

May 1923	Alfred Charles Barnes (Lot 31)	Vol: 3450 Fol: 226
February 1928	Australian Paper Manufacturers Limited (Portion 164 of Parish)	Vol: 4110 Fol 174
August 1942	Australian Paper Manufacturers Limited (Lot 31 & Portion 164 of Parish)	Vol: 5331 Fol: 41
December 1949	Fibre Containers Pty Limited	Vol: 5331 Fol: 41
May 1951	Fibre Containers Pty Limited	Vol: 6329 Fol: 46

# 4. HERITAGE SIGNIFICANCE

## 4.1. WHAT IS HERITAGE SIGNIFICANCE?

Before making decisions to change a heritage item, an item within a heritage conservation area, or an item located in proximity to a heritage listed item, it is important to understand its values and the values of its context. This leads to decisions that will retain these values in the future. Statements of heritage significance summarise the heritage values of a place – why it is important and why a statutory listing was made to protect these values.

## 4.2. SIGNIFICANCE ASSESSMENT

The Heritage Council of NSW has developed a set of seven criteria for assessing heritage significance, which can be used to make decisions about the heritage value of a place or item. There are two levels of heritage significance used in NSW: state and local. The following assessment of heritage significance has been prepared in accordance with the 'Assessing Heritage Significance' guides.

Table 3 Assessment of Heritage Significance

Criteria	Significance Assessment
<p><b>A – Historical Significance</b></p> <p><i>An item is important in the course or pattern of the local area's cultural or natural history.</i></p>	<p>The subject site originally formed part of the land awarded to Thomas Beverly Hall and James Rothwell by Crown Grant (1856). While the land is inherently associated with the broader development of the Matraville area, no aspects of the site today maintain any meaningful association with the area's local history.</p> <p>The site was formerly occupied by a large warehouse dating to c.1950s. While this warehouse was likely associated with Matraville's and indeed broader Sydney's industrial history, the warehouse was demolished in 2021.</p> <p>Accordingly, the subject site does not meet the criterion for heritage listing under Criterion A.</p>
<p><u>Guidelines for Inclusion</u></p> <ul style="list-style-type: none"> <li>▪ shows evidence of a significant human activity <input type="checkbox"/></li> <li>▪ is associated with a significant activity or historical phase <input type="checkbox"/></li> <li>▪ maintains or shows the continuity of a historical process or activity <input type="checkbox"/></li> </ul>	<p><u>Guidelines for Exclusion</u></p> <ul style="list-style-type: none"> <li>▪ has incidental or unsubstantiated connections with historically important activities or processes <input checked="" type="checkbox"/></li> <li>▪ provides evidence of activities or processes that are of dubious historical importance <input type="checkbox"/></li> <li>▪ has been so altered that it can no longer provide evidence of a particular association <input checked="" type="checkbox"/></li> </ul>

Criteria	Significance Assessment
<p><b>B – Associative Significance</b></p> <p><i>An item has strong or special associations with the life or works of a person, or group of persons, of importance in the local area's cultural or natural history.</i></p>	<p>Though the subject site was historically associated with Australia's paper manufacturing industry for a considerable time, the subject site fails to maintain any meaningful association with the life or works of a person, or group of persons of importance to the suburb of Matraville.</p> <p>The subject site does not meet the requisite threshold for heritage listing under Criterion B.</p>
<p><u>Guidelines for Inclusion</u></p> <ul style="list-style-type: none"> <li>▪ shows evidence of a significant human occupation <input type="checkbox"/></li> <li>▪ is associated with a significant event, person, or group of persons <input type="checkbox"/></li> </ul>	<p><u>Guidelines for Exclusion</u></p> <ul style="list-style-type: none"> <li>▪ has incidental or unsubstantiated connections with historically important people or events <input checked="" type="checkbox"/></li> <li>▪ provides evidence of people or events that are of dubious historical importance <input checked="" type="checkbox"/></li> <li>▪ has been so altered that it can no longer provide evidence of a particular association <input checked="" type="checkbox"/></li> </ul>
<p><b>C – Aesthetic Significance</b></p> <p><i>An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the local area.</i></p>	<p>The former warehouse located on the site was demolished in 2021. The subject site is currently vacant.</p> <p>The subject site does not meet the requisite threshold for heritage listing under Criterion C.</p>
<p><u>Guidelines for Inclusion</u></p> <ul style="list-style-type: none"> <li>▪ shows or is associated with, creative or technical innovation or achievement <input type="checkbox"/></li> <li>▪ is the inspiration for a creative or technical innovation or achievement <input type="checkbox"/></li> <li>▪ is aesthetically distinctive <input type="checkbox"/></li> <li>▪ has landmark qualities <input type="checkbox"/></li> <li>▪ exemplifies a particular taste, style or technology <input type="checkbox"/></li> </ul>	<p><u>Guidelines for Exclusion</u></p> <ul style="list-style-type: none"> <li>▪ is not a major work by an important designer or artist <input type="checkbox"/></li> <li>▪ has lost its design or technical integrity <input checked="" type="checkbox"/></li> <li>▪ its positive visual or sensory appeal or landmark and scenic qualities have been more than temporarily degraded <input checked="" type="checkbox"/></li> <li>▪ has only a loose association with a creative or technical achievement <input type="checkbox"/></li> </ul>

Criteria	Significance Assessment
<p><b>D – Social Significance</b></p> <p><i>An item has strong or special association with a particular community or cultural group in the local area for social, cultural or spiritual reasons.</i></p>	<p>The subject site was formerly the location of a large warehouse since approximately the 1950s. The subject site does not demonstrate any identifiable, meaningful associations with the community of Matraville, or any other particular cultural group of the local area for social, cultural or spiritual reasons.</p> <p>The subject site does not meet the requisite threshold for heritage listing under Criterion D.</p>
<p><u>Guidelines for Inclusion</u></p> <ul style="list-style-type: none"> <li>▪ is important for its associations with an identifiable group <input type="checkbox"/></li> <li>▪ is important to a community’s sense of place <input type="checkbox"/></li> </ul>	<p><u>Guidelines for Exclusion</u></p> <ul style="list-style-type: none"> <li>▪ is only important to the community for amenity reasons <input checked="" type="checkbox"/></li> <li>▪ is retained only in preference to a proposed alternative <input type="checkbox"/></li> </ul>
<p><b>E – Research Potential</b></p> <p><i>An item has potential to yield information that will contribute to an understanding of the local area’s cultural or natural history.</i></p>	<p>The former warehouse located on the site was demolished in 2021. The site is therefore limited in its potential to yield meaningful information about the cultural and/or natural history of Matraville.</p> <p>The subject site does not meet the requisite threshold for heritage listing under Criterion E.</p>
<p><u>Guidelines for Inclusion</u></p> <ul style="list-style-type: none"> <li>▪ has the potential to yield new or further substantial scientific and/or archaeological information <input type="checkbox"/></li> <li>▪ is an important benchmark or reference site or type <input type="checkbox"/></li> <li>▪ provides evidence of past human cultures that is unavailable elsewhere <input type="checkbox"/></li> </ul>	<p><u>Guidelines for Exclusion</u></p> <ul style="list-style-type: none"> <li>▪ the knowledge gained would be irrelevant to research on science, human history or culture <input checked="" type="checkbox"/></li> <li>▪ has little archaeological or research potential <input checked="" type="checkbox"/></li> <li>▪ only contains information that is readily available from other resources or archaeological sites <input checked="" type="checkbox"/></li> </ul>
<p><b>F – Rarity</b></p> <p><i>An item possesses uncommon, rare or endangered aspects of the local area’s cultural or natural history.</i></p>	<p>This part of Matraville is recognised as an industrial area, both historically and today. Large industrial sites are not uncommon throughout the suburb. The subject site cannot be considered rare in this context.</p> <p>The subject site does not meet the requisite threshold for heritage listing under Criterion F.</p>

Criteria	Significance Assessment
<p><u>Guidelines for Inclusion</u></p> <ul style="list-style-type: none"> <li>▪ provides evidence of a defunct custom, way of life or process <input type="checkbox"/></li> <li>▪ demonstrates a process, custom or other human activity that is in danger of being lost <input type="checkbox"/></li> <li>▪ shows unusually accurate evidence of a significant human activity <input type="checkbox"/></li> <li>▪ is the only example of its type <input type="checkbox"/></li> <li>▪ demonstrates designs or techniques of exceptional interest <input type="checkbox"/></li> <li>▪ shows rare evidence of a significant human activity important to a community <input type="checkbox"/></li> </ul>	<p><u>Guidelines for Exclusion</u></p> <ul style="list-style-type: none"> <li>▪ is not rare <input checked="" type="checkbox"/></li> <li>▪ is numerous but under threat <input type="checkbox"/></li> </ul>
<p><b>G – Representative</b></p> <p><i>An item is important in demonstrating the principal characteristics of a class of NSWs (or the local area's):</i></p> <ul style="list-style-type: none"> <li>▪ <i>cultural or natural places; or</i></li> <li>▪ <i>cultural or natural environments.</i></li> </ul>	<p>The former warehouse located on the subject site was demolished in 2021. The subject site is currently vacant. It does not reflect well the characteristics of any particular typology.</p> <p>The subject site does not meet the requisite threshold for heritage listing under Criterion G.</p>
<p><b>Guidelines for Inclusion</b></p> <ul style="list-style-type: none"> <li>▪ is a fine example of its type <input type="checkbox"/></li> <li>▪ has the principal characteristics of an important class or group of items <input type="checkbox"/></li> <li>▪ has attributes typical of a particular way of life, philosophy, custom, significant process, design, technique or activity <input type="checkbox"/></li> <li>▪ is a significant variation to a class of items <input type="checkbox"/></li> </ul>	<p><u>Guidelines for Exclusion</u></p> <ul style="list-style-type: none"> <li>▪ is a poor example of its type <input type="checkbox"/></li> <li>▪ does not include or has lost the range of characteristics of a type <input checked="" type="checkbox"/></li> <li>▪ does not represent well the characteristics that make up a significant variation of a type <input type="checkbox"/></li> </ul>

Criteria	Significance Assessment
<ul style="list-style-type: none"> <li>▪ is part of a group which collectively illustrates a representative type <span style="float: right;"><input type="checkbox"/></span></li> </ul>	
<ul style="list-style-type: none"> <li>▪ is outstanding because of its setting, condition or size <span style="float: right;"><input type="checkbox"/></span></li> </ul>	
<ul style="list-style-type: none"> <li>▪ is outstanding because of its integrity or the esteem in which it is held <span style="float: right;"><input type="checkbox"/></span></li> </ul>	

## 4.3. STATEMENT OF SIGNIFICANCE

### 4.3.1. Subject Site

The subject site has been assessed against the criteria set out by the Heritage Council of NSW, and this assessment has determined that the subject site does not meet the requisite threshold for heritage listing.

### 4.3.2. Bunnerong Stormwater Channel No 11

The following statement of significance has been reproduced from Sydney Water's Section 170 Heritage and Conservation Register.

*The Bunnerong stormwater drainage system is representative of stormwater channels in the Sydney Water Corporation system constructed by the PWD between 1930-1935 as part of the Unemployment Relief Program. The Depression period saw one of the greatest expansions in Sydney's stormwater system due to the Prevention and Relief of Unemployment Act 1930.*

*This Act enabled a workforce to be utilised at little cost to the MWS&D Board. The implementation of this Act led to the Minister for Public Works authorising the construction of many new stormwater channels within the Board's area of operations. Other examples of channels constructed during this period include Birds Gully, Haslam's Creek, Moore Park, Centennial Park to Park Road and Queens Park.*

*Tremendous benefits followed this action by the State Government and large areas of inner and suburban Sydney gained widespread improvements in their stormwater drainage systems. The operational curtilage of the stormwater channel includes the channel bed, walls and coping. The visual curtilage will vary along the length of the channel depending on the surrounding land uses<sup>12</sup>.*

<sup>12</sup> Sydney Water, Section 170 Heritage and Conservation Register, Bunnerong Stormwater Channel No 11.

## 5. BUILT HERITAGE IMPACT ASSESSMENT

Below, the potential impact of the proposal is assessed against the applicable heritage-related statutory and non-statutory planning controls which relate to the site and the proposed development.

### 5.1. STATUTORY CONTROLS

The proposal generally aligns with the intentions and heritage related provisions of the *Randwick Local Environmental Plan 2012*, the *Randwick Development Plan 2013* and the Heritage NSW Guidelines for Statements of Heritage Impact.

The proposed warehouse is assessed to have no adverse impact on the Bunnerong Stormwater Channel No. 11. The proposed development is appropriately set-back from the north-western boundary of the subject site, such that the development is at no risk of overwhelming or visually obscuring the stormwater channel.

The proposed development is assessed to have no impact on the operation of the stormwater channel. Overall, the proposal is assessed to have no adverse impact on the heritage significance of the Bunnerong Stormwater Channel No. 11 as part of Sydney's early stormwater drainage system.

### 5.2. NSW HERITAGE GUIDELINES

The proposed works are addressed in relation to relevant questions posed in Heritage NSW's (former Heritage Office/Heritage Division) 'Statement of Heritage Impact' guidelines.

Table 4 Heritage NSW Guidelines

Clause	Discussion
<p>The following aspects of the proposal respect or enhance the heritage significance of the item or conservation area for the following reasons:</p>	<p>The proposed development entails the construction of a two-level industrial complex on the subject site. The subject site is currently vacant.</p> <p>It has been identified that the existing in-ground drainage at the subject site is not suitable for the proposed development. The proposal requires minor works to the Bunnerong Stormwater Channel No. 11. It is proposed to create a new connection point to the Bunnerong Stormwater Channel to facilitate stormwater discharge into the asset. The new connection point is to be designed to be similar to that of the existing connection point at the northern end of the site. Details of the new connection point are to be developed as part of future detailed design. The new connection point is to be located mid-way along the Bunnerong Stormwater Channel which runs parallel to the north-western axis of the site.</p> <p>It is understood the proposed works do not increase impervious surfaces and that the anticipated flow from the site is to be equal to, or lesser than that facilitated by the existing arrangement. The proposed works are therefore assessed to have no adverse impact on the functionality or integrity of the stormwater channel.</p> <p>The new connection point and associated physical impacts maintain the original use and intended purpose</p>

Clause	Discussion
	<p>of the channel, ensuring its ongoing viability as a part of Sydney Water infrastructure.</p> <p>Physical impacts to the channel will be undertaken with minimum required intervention and made good where necessary to the satisfaction of Sydney Water.</p> <p>Overall, the above minor works are considered to have no detrimental heritage impact in facilitating the broader scheme whilst ensuring the continued function of the Bunnerong Stormwater Channel No. 11.</p>
<p>The following sympathetic solutions have been considered and discounted for the following reasons:</p>	<p>The Bunnerong Stormwater Channel No. 11 is listed on the NSW Section 170 Register. The item runs parallel to the north-western boundary of the subject site. The proposed industrial complex is assessed to have no detrimental impact on the stormwater channel. As such, no further sympathetic solutions have been considered or discounted.</p>
<p><b>New development adjacent to a heritage item</b></p> <p>How does the new development affect views to, and from, the heritage item?</p> <p>What has been done to minimise negative effects?</p> <p>How is the impact of the new development on the heritage significance of the item or area to be minimised?</p> <p>Why is the new development required to be adjacent to a heritage item?</p> <p>How does the curtilage allowed around the heritage item contribute to the retention of its heritage significance?</p> <p>Is the development sited on any known, or potentially significant archaeological deposits?</p> <p>If so, have alternative sites been considered? Why were they rejected?</p> <p>Is the new development sympathetic to the heritage item?</p> <p>In what way (e.g. form, siting, proportions, design)?</p> <p>Will the additions visually dominate the heritage item?</p> <p>How has this been minimised?</p>	<p>The proposed development at the subject site comprises a sizeable two-level industrial complex. The complex is to comprise a large warehouse building with central breezeway at ground and first floor. At ground parking facilities are to be located around the perimeter of the building. Additional parking is located along the eastern boundary of the site.</p> <p>The proposed complex does not materially impact the stormwater channel. Interpretation of the stormwater channel does not rely on the surrounding industrial context. Development along the north-western axis of the site is appropriately setback from the boundary such that sufficient physical separation is maintained around the stormwater channel.</p> <p>Notwithstanding the above, it has been identified that the existing drainage infrastructure is not suitable for the proposed complex.</p> <p>The significance of the stormwater channel is vested primarily in its utility as part of Sydney's early stormwater drainage systems. The operational curtilage includes the channel bed, walls and coping. The visual curtilage varies along the length of the channel depending on the surrounding land uses. The new connection point and associated physical impacts maintain the original use and intended purpose of the channel, ensuring its ongoing viability as a part of Sydney Water infrastructure.</p>

Clause	Discussion
<p>Will the public, and users of the item, still be able to view and appreciate its significance?</p>	<p>The new connection point does not impact on the historical significance of Bunnerong Stormwater Channel No 11.</p>
<p><b>New landscape works (including car parking and fences)</b></p> <p>How has the impact of the new work on the heritage significance of the existing landscape been minimised?</p> <p>Has evidence (archival and physical) of previous landscape work been investigated? Are previous works being reinstated?</p> <p>Has the advice of a consultant skilled in the conservation of heritage landscapes been sought? If so, have their recommendations been implemented?</p> <p>Are any known or potential archaeological deposits affected by the landscape works? If so, what alternatives have been considered?</p> <p>How does the work impact on views to, and from, adjacent heritage items?</p>	<p>New landscaping at the subject site comprises primarily hardstand areas and above ground parking facilities. Minimal planting is to be located along sections of the northern, eastern and southern boundaries. Landscaping elements are limited to the boundaries of the subject site and do not physically or visually impact Bunnerong Stormwater Channel No 11. Adequate separation from the stormwater channel is maintained along the north-western boundary of the site. Landscaping works associated with the proposed development are at no risk of overwhelming or diminishing the significance of Bunnerong Stormwater Channel No. 11.</p>

## 6. HISTORICAL ARCHAEOLOGY

In addition to the extant built structures and open space within the curtilage of the site, there may also be archaeological evidence relating to existing or earlier (now demolished) buildings and uses. The following is a high-level assessment of the historical archaeological potential of the subject area.

### 6.1. FRAMEWORK FOR ASSESSMENT

The *NSW Heritage Manual* (Heritage Office and Department of Urban Affairs and Planning, 1996) defines historical archaeological potential as:

*The degree of physical evidence present on an archaeological site, usually assessed on the basis of physical evaluation and historical research.*

Archaeological research potential of a site is the extent to which further study of relics likely to be found is expected to contribute to improved knowledge about NSW history which is not demonstrated by other sites, archaeological resources or available historical evidence. The potential for archaeological relics to survive in a particular place is significantly affected by later activities that may have caused ground disturbance. These processes include the physical development of the site (for example, phases of building construction) and the activities that occurred there.

The archaeological potential of the subject area is assessed based on the background information presented in Section 3 and graded according to the following scheme:

- **Nil Potential:** the land use history demonstrates that high levels of ground disturbance have occurred that would have destroyed any archaeological remains; or archaeological excavation has already occurred and removed any potential resource.
- **Low Potential:** the land use history suggests limited development or use, or there is likely to be quite high impacts in these areas; however, deeper sub-surface features such as wells, cesspits and their artefact bearing deposits may survive.
- **Moderate Potential:** the land use history suggests limited phases of low to moderate development intensity, or there have been some impacts in the area. Some archaeological remains are likely to survive, including building footings and shallower remains, in addition to deeper sub-surface features.
- **High Potential:** substantially intact archaeological deposits could survive in these areas.

The potential for archaeological remains or 'relics' to survive in a particular place is significantly affected by land use activities that may have caused ground disturbance. These processes include the physical development of the site (e.g. phases of building construction) and the activities that occurred there. The following definitions are used to consider the levels of disturbance:

- **Low Disturbance:** the area or feature has been subject to activities that are likely to have had a minor effect on the integrity and survival of archaeological remains.
- **Moderate Disturbance:** the area or feature has been subject to activities that may have affected the integrity and survival of archaeological remains. While archaeological evidence may be present, they are likely to have been disturbed.
- **High Disturbance:** the area or feature has been subject to activities that would have had a major effect on the integrity and survival of archaeological remains. Archaeological evidence are likely to be significantly disturbed or destroyed.

The following assessment of archaeological potential of the present subject area has been undertaken based on the above framework.

### 6.2. ARCHAEOLOGICAL POTENTIAL

As discussed in Section 3 above, the first land grants associated with the site date to the 19<sup>th</sup> century. However, significant development of site likely did not occur until the early 20<sup>th</sup> century. An aerial photograph of the subject area from 1943 (Figure 18) shows that the subject area has been largely cleared of vegetation by this time, although it remained mostly undeveloped. A small cluster of residential buildings is evident in the north-east corner of the subject area on Raymond Avenue, along with several other isolated buildings.

An array of rectilinear features running parallel to the south-eastern boundary may be livestock yards, suggesting the subject area was used for grazing at this time.

All early buildings and other infrastructure on the site were demolished in ca. 1960s with the construction of the existing hardstand and warehouse, as evidenced by an aerial photograph of the site from 1955 (Figure 20). The remains of the early buildings on the site, infrastructure (e.g. paths and fences) and casual finds associated with the site's early use are likely to have been destroyed by the subsequent development of the site to build the warehouse and hardstand.

A geotechnical investigation of the subject area was undertaken by PSM confirms the high level of disturbance.<sup>13</sup> The report presents the findings from concrete coring and cone penetration testing (CPT). The geotechnical investigation found a disturbed fill layer to a minimum depth of 0.8 to 1.4 m below the existing ground surface. The depth of ground disturbance within the subject area significantly reduces the likelihood of historical archaeological remains being retained.

Based on the high level of ground disturbance associated with the construction of the extant buildings and infrastructure, the site is assessed as having **low historical archaeological potential**.

It is therefore recommended that no further investigation historical archaeological investigation need be undertaken prior to works within the site and that the development may proceed with caution, subject to the following archaeological chance finds and human remains procedures being implemented and followed:

### **Archaeological Finds Procedure**

Should any archaeological deposits be uncovered during any site works, the following steps must be followed:

1. All works within the vicinity of the find must immediately stop. The find must not be moved 'out of the way' without assessment.
2. The site supervisor or another nominated site representative must contact either the project archaeologist (if relevant) or Heritage NSW (Enviroline 131 555) to contact a suitably qualified archaeologist.
3. The nominated archaeologist must examine the find, provide a preliminary assessment of significance, record the item and decide on appropriate management measures. Such management may require further consultation with Heritage NSW and preparation of a research design and archaeological investigation/salvage methodology.
4. Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required and further archaeological investigation undertaken.
5. Reporting may need to be prepared regarding the find and approved management strategies.
6. Works in the vicinity of the find can only recommence upon receipt of approval from Heritage NSW.

### **Human Remains Procedure**

In the unlikely event that human remains are uncovered during the proposed works, the following steps must be followed:

1. All works within the vicinity of the find must immediately stop. The find must be cordoned-off and signage installed to avoid accidental impact.
2. The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW (Enviroline 131 555).
3. The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.
4. Management recommendations are to be formulated by the NSW Police, Heritage NSW and site representatives.
5. Works are not to recommence until the find has been appropriately managed.

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<sup>13</sup> PSM, 2021. *42 Raymond Avenue, Matraville. Results of Detailed Geotechnical Investigation*

## 7. CONCLUSION AND RECOMMENDATIONS

A detailed assessment of the proposed works has been undertaken in Section 5 and 6 of this report. The assessment carried out in this report concludes the following:

- **Built Heritage** – The proposed development at the subject site is assessed to have no adverse impact on the Bunnerong Stormwater Channel No 11, as an item listed on Sydney Water State Agency *Section 170 Heritage and Conservation Register* under the Heritage Act 1977.
- **Historical Archaeology** – Based on the high level of ground disturbance associated with the construction of the extant buildings and infrastructure, the site is assessed as having low historical archaeological potential.

For the reasons stated above, the proposed works are recommended for approval from a heritage perspective having regard to the proposed recommendations below.

### RECOMMENDATIONS

It is recommended that no further historical archaeological investigation need be undertaken prior to works within the site and that the development may proceed with caution, subject to the following archaeological chance finds and human remains procedures being implemented and followed:

#### Archaeological Finds Procedure

Should any archaeological deposits be uncovered during any site works, the following steps must be followed:

1. All works within the vicinity of the find must immediately stop. The find must not be moved 'out of the way' without assessment.
2. The site supervisor or another nominated site representative must contact either the project archaeologist (if relevant) or Heritage NSW (Enviroline 131 555) to contact a suitably qualified archaeologist.
3. The nominated archaeologist must examine the find, provide a preliminary assessment of significance, record the item and decide on appropriate management measures. Such management may require further consultation with Heritage NSW and preparation of a research design and archaeological investigation/salvage methodology.
4. Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required and further archaeological investigation undertaken.
5. Reporting may need to be prepared regarding the find and approved management strategies.
6. Works in the vicinity of the find can only recommence upon receipt of approval from Heritage NSW.

#### Human Remains Procedure

In the unlikely event that human remains are uncovered during the proposed works, the following steps must be followed:

1. All works within the vicinity of the find must immediately stop. The find must be cordoned-off and signage installed to avoid accidental impact.
2. The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW (Enviroline 131 555).
3. The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.
4. Management recommendations are to be formulated by the NSW Police, Heritage NSW and site representatives.
5. Works are not to recommence until the find has been appropriately managed.

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