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**URBIS**

# **HERITAGE IMPACT STATEMENT**

28-32 Bourke Road,  
Alexandria

Prepared for

**ALEXANDRIA PROPERTY DEVELOPMENT PTY LTD**

6 July 2022

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# EXECUTIVE SUMMARY

Urbis has been engaged by Alexandria Property Development Pty Ltd to prepare the following Heritage Impact Statement (HIS) related to a proposed development at 28-32 Bourke Road (subject site).

Development consent is sought for a concept proposal for the 'Alexandria Health Centre' comprising medical centre uses and anchored by a mental health hospital. Specifically, the application seeks concept approval for:

- In principle arrangements for the demolition of existing structures on the site and excavation to accommodate a single level of basement car parking (partially below ground level).
- A building envelope to a maximum height of 45 m (RL 53.41) (including architectural roof features and building plant). The podium will have a maximum height of RL 28.41.
- A maximum gross floor area of 11,442.20 sqm, which equates to a maximum FSR of 3.85:1. The total FSR will comprise a base FSR of 2:1, a community infrastructure bonus FSR of 1.5:1 and a 10% design excellence bonus FSR (subject to a competitive design alternatives process).
- Indicative use of the building as follows:
  - Mental health hospital at levels 5-7.
  - Medical centre uses at levels 1-4; and
  - Ground level reception/lobby and pharmacy.
- Principles for future vehicular ingress and egress from Bourke Road along the site's western frontage.
- Subject to agreement on a public benefit offer submitted with this application, the proposal includes the indicative dedication of the following land to Council as envisaged by the Draft Sydney Development Control Plan 2012 – Southern Enterprise Area Amendment (Draft DCP):
  - A 2.4m wide strip of land along the site's frontage to Bourke Road for the purpose of footpath widening
  - A 3m wide lane along the site's western boundary contributing towards a 6m wide lane (it is noted that the concept proposal will allocate an additional 3 m strip of land within the site along the western boundary to enable two-way vehicle movement into and out of the site).
  - A 3m wide lane along the site's southern boundary, contributing towards a 9m wide lane.

This HIS has been prepared to fulfil the requirements of the Planning Secretary's Environmental Assessment Requirements (SEARs) for State Significant Development (SSD)-38600121, issued 7 April 2022. The SEARs notes the following requirements with respect to environmental heritage:

## **18. Environmental Heritage**

*Where there is potential for direct or indirect impacts as a result of the concept development on the heritage significance of items of environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (if potential impacts to archaeological resources are identified), prepared in accordance with the relevant guidelines, which assesses any impacts and outlines measures to ensure they are minimised and mitigated.*

The subject site is not identified as a heritage item on any statutory or non-statutory list or register. Additionally, the site is not located within the vicinity of any heritage items, nor is it located within a Heritage Conservation Area (HCA).

In accordance with the SEARs, this HIS discusses the potential heritage impact of the proposed works. This includes an assessment of the potential heritage significance of the existing buildings on the site (carried out in Section 4 of this HIS), which are industrial buildings older than 50 years. With respect to potential significance, the buildings are found to have an incidental association with the expansion of industrial development in Alexandria, however are not considered significant in their own right. The buildings have undergone several detrimental and irreversible alterations resulting in the loss of the form and character of the original warehouse buildings. The site does not meet the threshold of any of the criteria used to assess heritage significance and, therefore, does not warrant heritage listing.

A detailed impact assessment of the proposed works has been undertaken in Section 5 of this report. The proposed development has been assessed to have no heritage impact on the significance of the subject site and surrounding pertinent heritage significance. Key aspects of the assessment are listed below:

- The proposed development would not entail work to a heritage item, nor to a site within an HCA, or in the vicinity of listed heritage items. There would, therefore, be no impacts on any heritage items or conservation areas, including on any significant fabric, setting, or views.
- The proposal involves the in-principal demolition of Inter-War warehouse buildings that are over 50 years (albeit not heritage listed or located within an HCA). However, the site is found to be of no heritage significance, as based on the detailed significance assessment carried out in Section 4. As such, the proposed demolition of the existing buildings is not considered to generate any unreasonable heritage impacts.
- The proposed development is commensurate with the broader strategic objectives of redevelopment around Green Square, and demonstrates an orderly approach to development within the area.

For the reasons stated above, the proposed works are recommended for approval from a heritage perspective.

# 1. INTRODUCTION

## 1.1. BACKGROUND & PURPOSE

Urbis has been engaged by Alexandria Property Development Pty Ltd to prepare this Heritage Impact Statement (HIS) related to a proposed development at 28-32 Bourke Road, Alexandria (the site).

This HIS has been prepared to fulfil the requirements of the Planning Secretary's Environmental Assessment Requirements (SEARs) for State Significant Development (SSD)-38600121, issued 7 April 2022. The SEARs includes the following requirements with respect to environmental heritage:

### 18. Environmental Heritage

*Where there is potential for direct or indirect impacts as a result of the concept development on the heritage significance of items of environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (if potential impacts to archaeological resources are identified), prepared in accordance with the relevant guidelines, which assesses any impacts and outlines measures to ensure they are minimised and mitigated.*

This HIS relates only to built heritage matters only and has been prepared in partial fulfilment of clause 18 of the SEARs. Archaeological matters are considered in separate reports also prepared by Urbis under separate cover (comprising an Aboriginal Objects Due Diligence Assessment, and an Aboriginal Cultural Heritage Assessment).

## 1.2. SITE LOCATION

The site comprises the following individual properties:

- 28 Bourke Road, Alexandria (Lot 3 / DP324707) – containing 2 individual single-storey structures
- 30-32 Bourke Road, Alexandria (Lots 1 & 2 / DP324707) – containing 1 single-storey structure



Figure 1 – Aerial image of locality, with subject site identified  
Source: Urbis, 2021



## 1.3. HERITAGE CONTEXT

### 1.3.1. Heritage listing

The subject site is not identified as a heritage item on any statutory or non-statutory list or register.

### 1.3.2. City of Sydney warehouse study

The 2014 *Report on City of Sydney Industrial & Warehouse Buildings Heritage Study* did not identify the site as a potential heritage item, nor within the boundaries of any potential Heritage Conservation Area.

### 1.3.3. Heritage Conservation Area

The site is not located within the boundaries, or in the vicinity of, any identified Heritage Conservation Area (HCA).

### 1.3.4. Heritage items in the vicinity

The site is not located in the vicinity of any listed heritage items.

However, it is noted that the subject site is within the vicinity and visual catchment of the former Paul Roberts and Parsons warehouse building at 5 Bourke Road (to the north-east of the site). This building is identified as a potential heritage item within the 2014 warehouse study, however its listing has never been formalised.

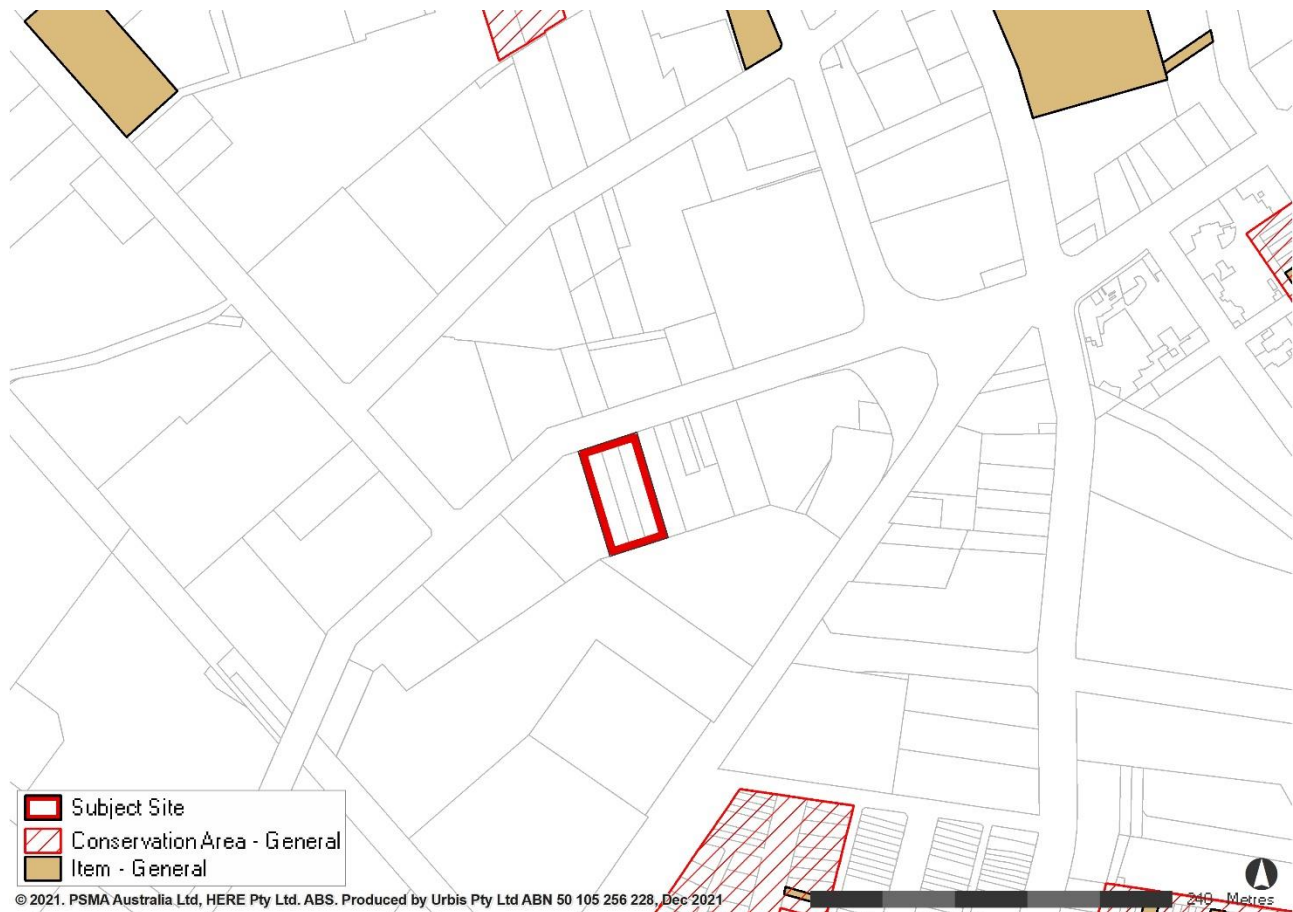


Figure 2 – Heritage map, showing subject site and surrounding heritage context – note the absence of vicinity items or HCAs

Source: Urbis, 2021



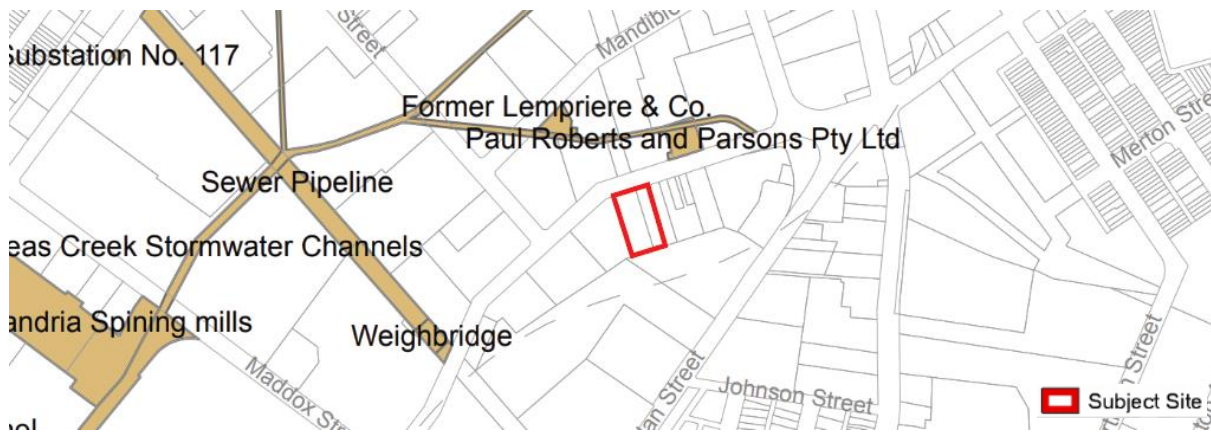


Figure 3 – Detail from 2014 Report on City of Sydney Industrial & Warehouse Buildings Heritage Study, showing subject site (outlined red) and surrounding sites which were identified as potential heritage items (shaded tan)

Source: City of Sydney 2014, with Urbis overlay

## 1.4. METHODOLOGY

This HIS 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).

Site constraints and opportunities have been considered with reference to relevant controls and provisions contained within the Sydney Local Environmental Plan 2012 (LEP) and the Sydney Development Control Plan 2012 (DCP).

## 1.5. AUTHOR IDENTIFICATION

This HIS has been prepared by Anthony Kilias (Senior Consultant) and Cecelia Heazlewood (Consultant).

## 1.6. PROPOSED DEVELOPMENT

Development consent is sought for a concept proposal for the ‘Alexandria Health Centre’ comprising medical centre uses and anchored by a mental health hospital. Specifically, the application seeks concept approval for:

- In principle arrangements for the demolition of existing structures on the site and excavation to accommodate a single level of basement car parking (partially below ground level).
- A building envelope to a maximum height of 45 m (RL 53.41) (including architectural roof features and building plant). The podium will have a maximum height of RL 28.41.
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- Subject to agreement on a public benefit offer submitted with this application, the proposal includes the indicative dedication of the following land to Council as envisaged by the Draft Sydney Development Control Plan 2012 – Southern Enterprise Area Amendment (Draft DCP):
  - A 2.4m wide strip of land along the site’s frontage to Bourke Road for the purpose of footpath widening

- A 3m wide lane along the site's western boundary contributing towards a 6m wide lane (it is noted that the concept proposal will allocate an additional 3 m strip of land within the site along the western boundary to enable two-way vehicle movement into and out of the site).
- A 3m wide lane along the site's southern boundary, contributing towards a 9m wide lane.

## 2. HISTORICAL CONTEXT

### 2.1. ALEXANDRIA SITE HISTORY

#### 2.1.1. Early Colonial agricultural land use, c.1810-c.1900s

Prior to European settlement and the establishment of Alexandria, the landscape primarily consisted of swamplands. The suburb of Alexandria was named after Princess Alexandra, who married Edward, Prince of Wales (later King Edward VII) in 1863. By the 1820s the area was supporting a number of industrial operations, including the Waterloo Flour Mills owned by William Hutchinson, Daniel Cooper and others. The area around the mill remained crown land until it was granted to William Hutchinson in 1823 as a grant of 1,400 acres. Hutchinson was a superintendent of convicts and public works at Waterloo Farm and held his land for two years before selling it to Daniel Cooper and Solomon Levey.<sup>1</sup>

Figure 4 shows that by 1843, the subject site consisted of vacant swampland. Additionally, there is a fence structure in proximity to the east of the subject site. The fence structure is likely associated with the industrial operations of the Waterloo Flour Mill / stock grazing and agistment / Chinese market gardens.

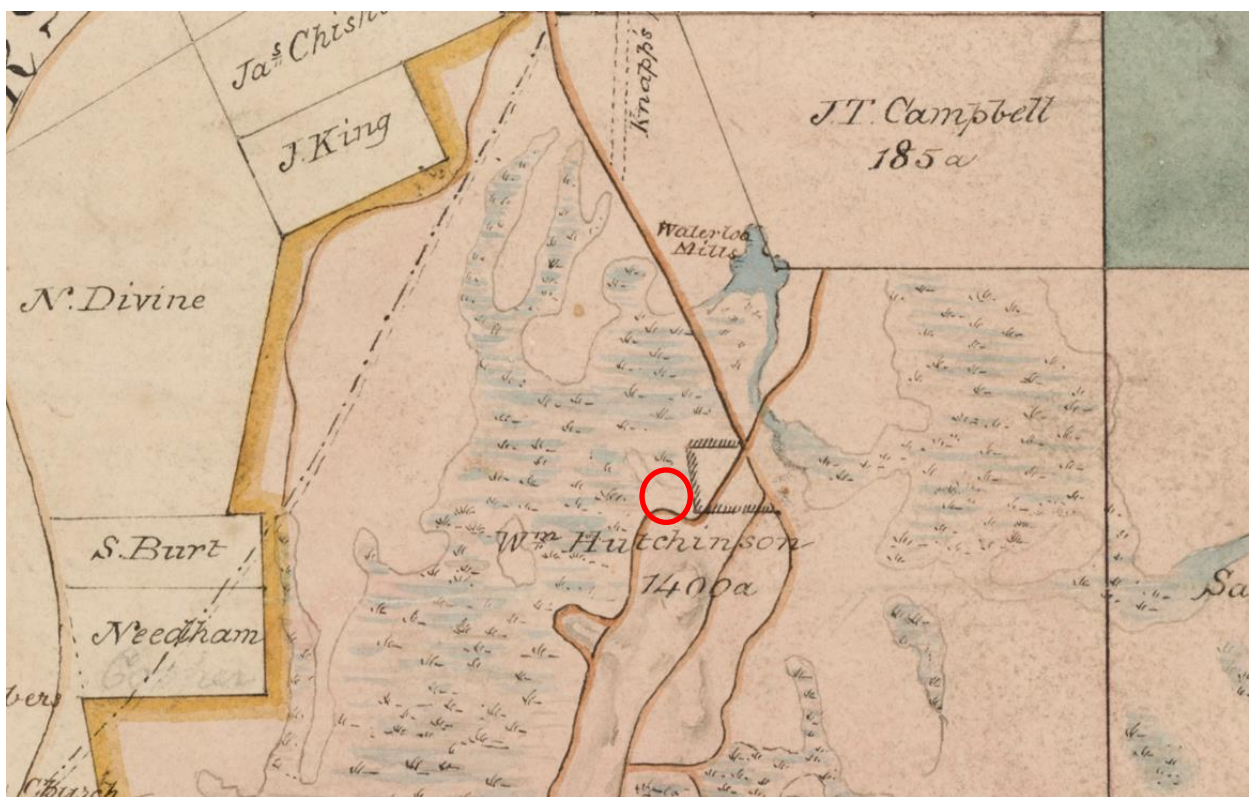


Figure 4 – Historical map from 1843, showing extent of land subdivision at that period. The approximate location of the subject site is shown in the red circle; note that waterways are extending into the subject area.

Source: HLRV, Parish of Alexandria, County of Cumberland, with Urbis overlay

In the early days of European settlement, the parish of Alexandria was mainly known for its Chinese market gardens arranged around the alluvial flats of Shea's Creek, along the northern side of present-day Bourke Road. The southern side comprised the Waterloo Estate, at that time owned by Sir D. Cooper.

<sup>1</sup> Pollon, F 1996, *The book of Sydney suburbs*, Cornstalk, Sydney.

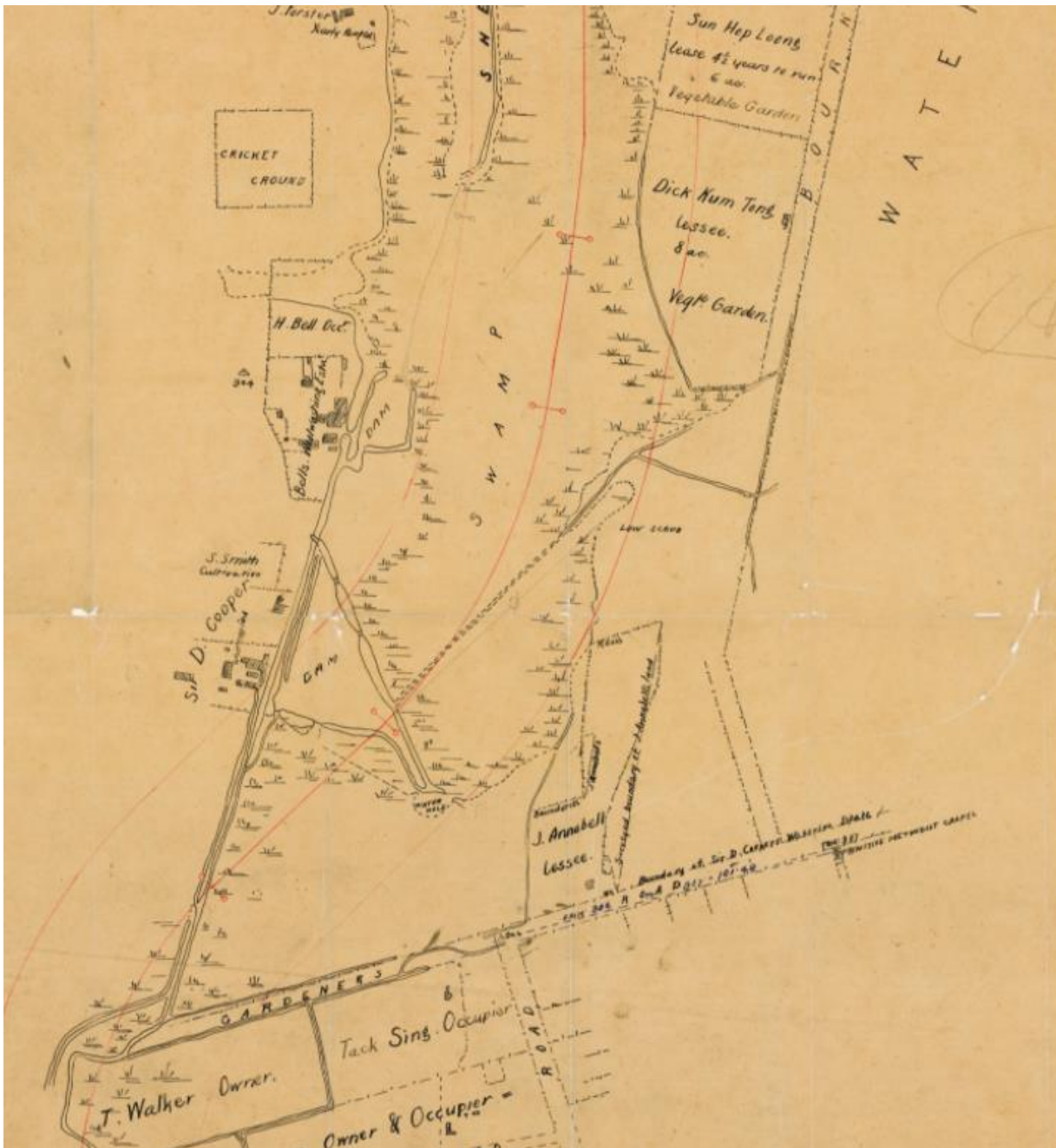


Figure 5 – Undated (assumed circa-1820s) map showing properties and their owners / occupiers around present-day Waterloo & Alexandria (Bourke Road & Gardeners Road evident), with owners and occupiers. Note that the subject site is not shown as it is located further north along Bourke Road, however would be located above the top right corner of the image.

Source: State Library of NSW (095-Z/SP/A2/92)

By the late 19<sup>th</sup> century Alexandria underwent further subdivision and residential development. Historical surveys from 1881 demonstrate the establishment of residential dwellings within former sections associated with the Waterloo Estate, primarily along Botany Bay Road. These dwellings were constructed out of brick and stone and include outbuildings.<sup>2</sup>

Mapping from this period also shows the establishment of Bourke Road along with fencing and potential structures within the present-day subject site. Although there is no detailed mapping of the subject site and

<sup>2</sup> CRM, 2013, 2-20 Botany Road Alexandria – Archaeological Assessment Historic Period, p. 31.



surrounding area during the late 19<sup>th</sup> century, newspaper articles demonstrate that Bourke Road was occupied by Chinese farmers as well as European farmers.

Newspaper accounts of the time provide some indication of residential occupation:

*“At the South Sydney Morgue this morning, an inquest was held before Mr. Henry T. Wilkinson, J.P., touching the death of a Chinaman named Hong Sin, aged 42 years, who expired suddenly at his residence, Bourke Road, Alexandria, on Sunday last.”*<sup>3</sup>

*“John Saul, a boy 8 years old, living with his parents off the Bourke Road, Alexandria, deposed that about 1:30 p.m. yesterday he was going across the bush near his home to fetch the cows when he saw the body of a man lying against a bush.”*<sup>4</sup>

Due to the establishment of Chinese market gardens along the northern side of Bourke Road, it is possible that European farmers occupied portions of land along the southern side of Bourke Road. These portions of land could include the subject site.



Figure 6 – Map of the country around Sydney, 1881 from Reconnaissance by Lieut. Parrott, Volr. Engineers. The approximate location of the subject site is circled in red.

Source: NLA MAP RM 903, with Urbis overlay

<sup>3</sup> The Australian Star, 11 December 1888, “A FATAL MEAL”. Available at <https://trove.nla.gov.au/newspaper/article/228413516?searchTerm=Bourke%20Road%2C%20Alexandria>

<sup>4</sup> Evening News, 14 July 1887, “Death from Apoplexy”. Available at <https://trove.nla.gov.au/newspaper/article/108007120?searchTerm=Bourke%20Road%2C%20Alexandria>



## 2.1.2. Industrial phase, c.1900s-c.1943

By the beginning of the 20<sup>th</sup> century, Alexandria began to develop as an industrial centre. This development led to Alexandria being referred to as the 'Birmingham of Australia', after the British Midlands industrial hub.<sup>5</sup> Following the construction of a tramway from the Sydney CBD to the area in 1882, the Botany Road Trust undertook a program of pavement and kerbing construction along the route. The tram service ceased operations in 1949 and was replaced by government operated buses.<sup>6</sup>

Early newspaper articles demonstrate the establishment of factories along Bourke Road at the beginning of the 20<sup>th</sup> century.

*"The fire that broke out at 1:30 this morning in the margarine factory of Kitchen & Sons, Ltd., Bourke Road, Alexandria, was discovered by the watchman at the adjoining works of the Co-Operative Wholesale Society."*<sup>7</sup>

Throughout the Inter-War period Sydney's industry expanded to the south, occupying the former swampy areas around Waterloo and Alexandria. The land was cheap, provided good access to water supplies, and importantly removed noxious industries from the inner city.<sup>8</sup> The subdivision of the Cooper-Levey Estate freed up much of the land in south Sydney and led to the rapid development of the area in the Inter-War period, with large expanses of land converted into industrial sites.

The subject site was likely used as an industrial complex during this period.

## 2.2. SUBJECT SITE

### 2.2.1. 28-30 Bourke Road

Historically the subject area was found to have been occupied by several commercial and industrial proprietors including chemical and metal product manufacturers, zinc and lead merchants, sprayers, adhesives manufacturers and a car tyre fitter's workshop.<sup>9</sup>

An early land survey of the area from 1893 indicates that there was an industrial presence in the area by this time, however, there is little development on the subject site itself outside of a few outbuildings and sheds. Land title records from 1929 indicate that the subject site was originally contained within 'Lot C' of an earlier subdivision of the area.<sup>10</sup> In the same year, the original purchaser, Norman Rigg Smith, subdivided the allotment to create the three separate allotments contained within the subject site.<sup>11</sup> Lots 1 and 3 were sold to investor, Aubin Rene Lhuede, and Lot 2 was sold to engineer, Norman William Parsons. In 1935, it appears Parsons teamed up with associates, Harold Frederick Charles Roberts and Ernest William Paul, to create Paul Roberts Parsons Ltd.<sup>12</sup> In 1938, Paul Roberts Parsons Ltd purchased Lot 1 to expand their area. It appears that their company specialised in fine metal engineering work. Lot 3 was purchased by metal merchant, James Booth in 1932, and in 1937 was transferred to F H Booth and Son Pty. Ltd.<sup>13</sup>

Industrial designer and manufacturing company, Gilkon Pty Ltd purchased Lots, 1, 2 & 3 off Paul Roberts Parsons Ltd and F H Booth and Son Pty. Ltd 1969.<sup>14</sup> Mooney Properties Pty Ltd, purchased the site in 1989.<sup>15</sup>

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<sup>5</sup> Whittaker, Anne-Marie Pictorial History: South Sydney. Alexandria, NSW Kingsclear Books 2002:121

<sup>6</sup> Dept Environment & Heritage Heritage Act - s.170 NSW State agency heritage register 27 Sep 2005

<sup>7</sup> The Sun, 29 July 1913, "BURNT OUT". Available at

<https://trove.nla.gov.au/newspaper/article/229676595?searchTerm=Bourke%20Road%2C%20Alexandria>

<sup>8</sup> City Plan Heritage, 2014. *City of Sydney Industrial & Warehouse Buildings Heritage Study*, 26.

<sup>9</sup> EP RISK, 2022, p. i.

<sup>10</sup> NSW Land Registry Services, Vol Fol 4250 104

<sup>11</sup> Ibid.

<sup>12</sup> NSW Land Registry Services, Vol Fol 4352 106

<sup>13</sup> NSW Land Registry Services, Vol Fol 4359 123

<sup>14</sup> Ibid.

<sup>15</sup> EP RISK, 2022, p. 11.



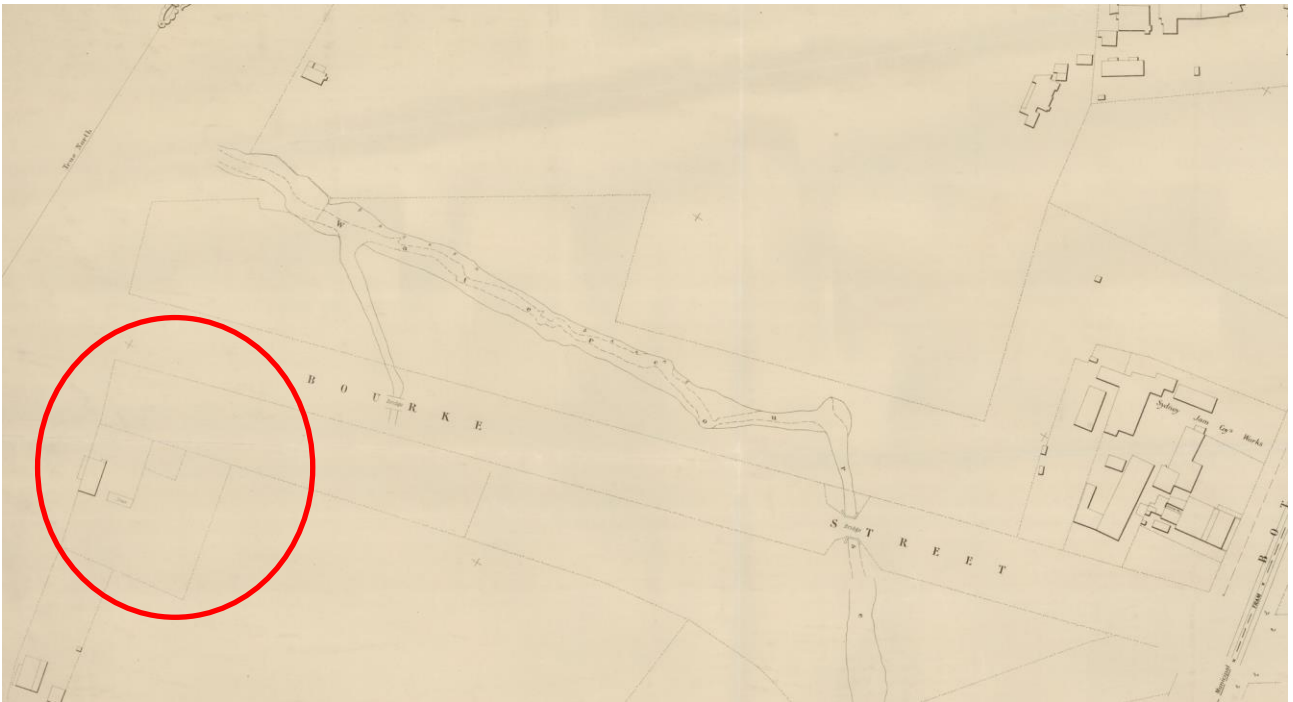


Figure 8 – Extract from 1893 survey drawing, with approximate location of subject site indicated in red. There was little development in the area, except for some small outbuildings and sheds.  
 Source: City of Sydney Archives, with Urbis overlay

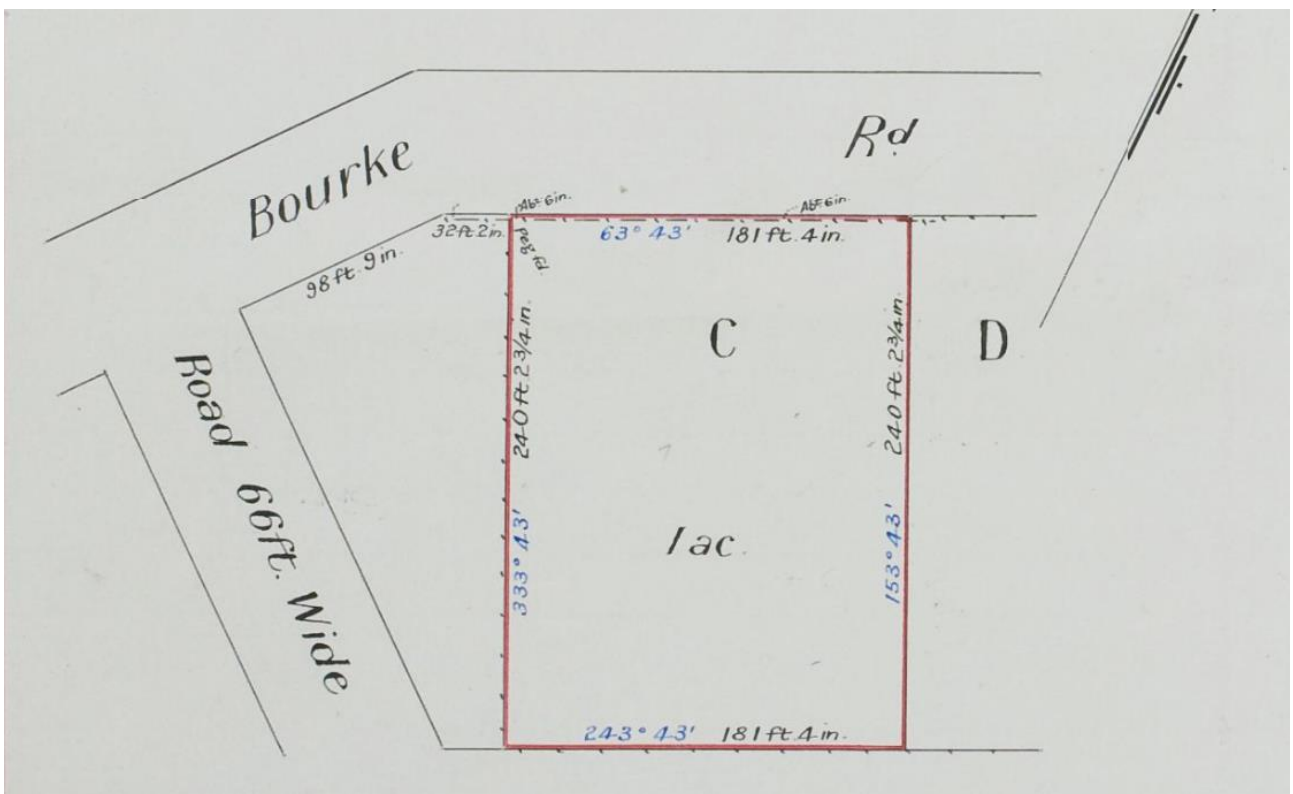


Figure 9 – Land title records, c.1929, showing the subject site prior to subdivision.  
 Source: NSW Land Registry Services, Vol Fol 4250 104

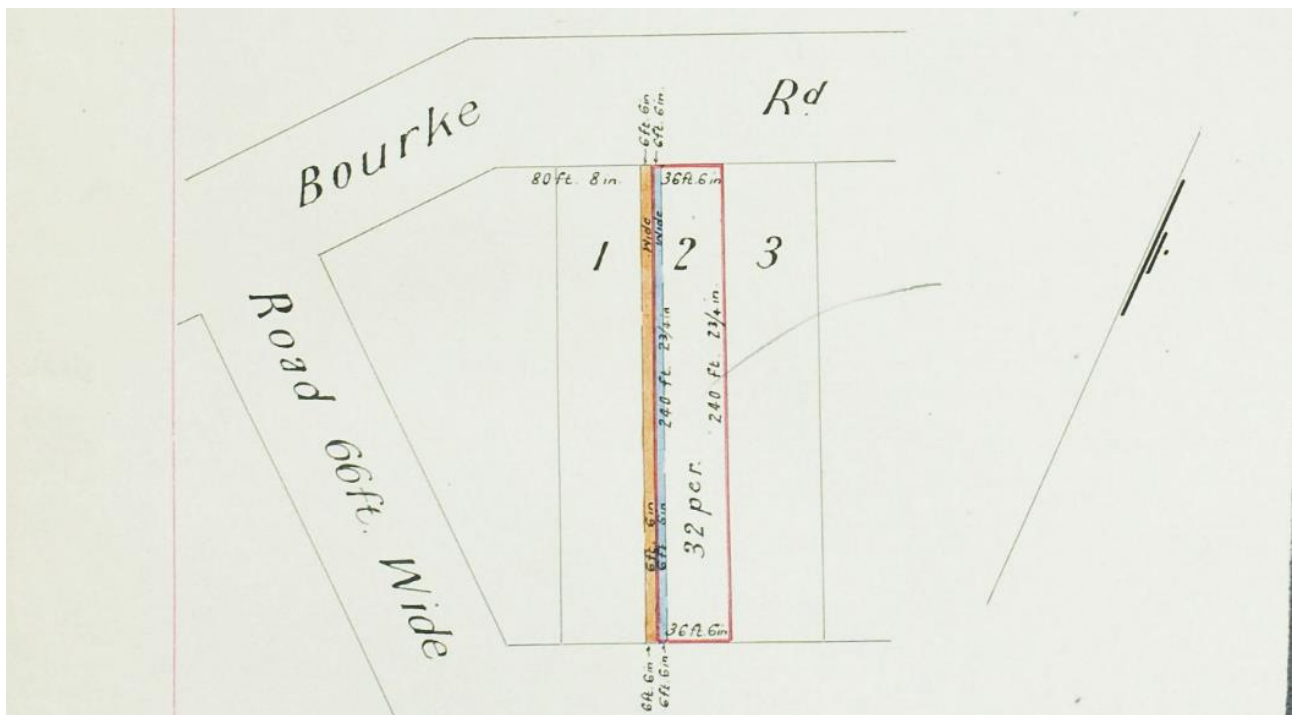


Figure 10 – Land title records, c.1929, showing the three separate allotments contained within the subject site  
Source: NSW Land Registry Services, Vol Fol 4352 106

An aerial image from 1943 shows that the local area was characterised by larger scale warehouses and industrial buildings by this time, with a large warehouse building constructed on the western side of the subject site with three smaller adjoining buildings. The western and northern part of the subject site remained predominantly undeveloped with the exception of a few ancillary shed structures. Bourke Road appears to be a dirt road at this time.

The existing buildings appear to date to the Inter-War period, owing to the visible presence of construction materials and techniques that were characteristic of that period. Despite some modifications over time, as demonstrated in the historical aerials below (namely, changes to roof cladding, and the introduction and removal of smaller ancillary structures), changes to the site have remained relatively minor. Recent modifications to the site and the building include:

- Connection between buildings nos. 30-32 and no. 28, resulting in large opening in existing walls, c.1984<sup>16</sup>
- Rear building erected, alterations to façade and internal layout between (as shown on plans below) 1986-1991<sup>17</sup>
- New roof 1987<sup>18</sup>
- In 1996 a Development Application was lodged by BBC Hardware with the former South Sydney Council (City of Sydney) for the construction of the existing hardware building
- Replacement of roof sheeting to front building and awning over breezeway, between 1998-2004 (possibly following 1999 hailstorm)

<sup>16</sup> Bourke Rd (28-32), Alexandria. 3- proposed openings through existing brick walls. (01/01/1984 - 31/12/1984), [A-00557146]. City of Sydney Archives, accessed 04 May 2022, <https://archives.cityofsydney.nsw.gov.au/nodes/view/1432849>

<sup>17</sup> Bourke Rd (28,30,32,) Alexandria. Extension to warehouse. Tsang & Lee, Architects. (01/01/1987 - 31/12/1987), [A-00570044]. City of Sydney Archives, accessed 04 May 2022, <https://archives.cityofsydney.nsw.gov.au/nodes/view/1437489>

<sup>18</sup> 28, 30-32 Bourke Rd Alexandria. Erect new roof on warehouse. Tsang & Lee Architects (04/05/1987 - 22/05/1987), [A-00236596]. City of Sydney Archives, accessed 04 May 2022, <https://archives.cityofsydney.nsw.gov.au/nodes/view/862979>

- In 2001, Bunnings purchased the BBC Hardware network of stores and opened their operations on the subject site. The development was consistent with the branding and typology for the chain of warehouse stores.

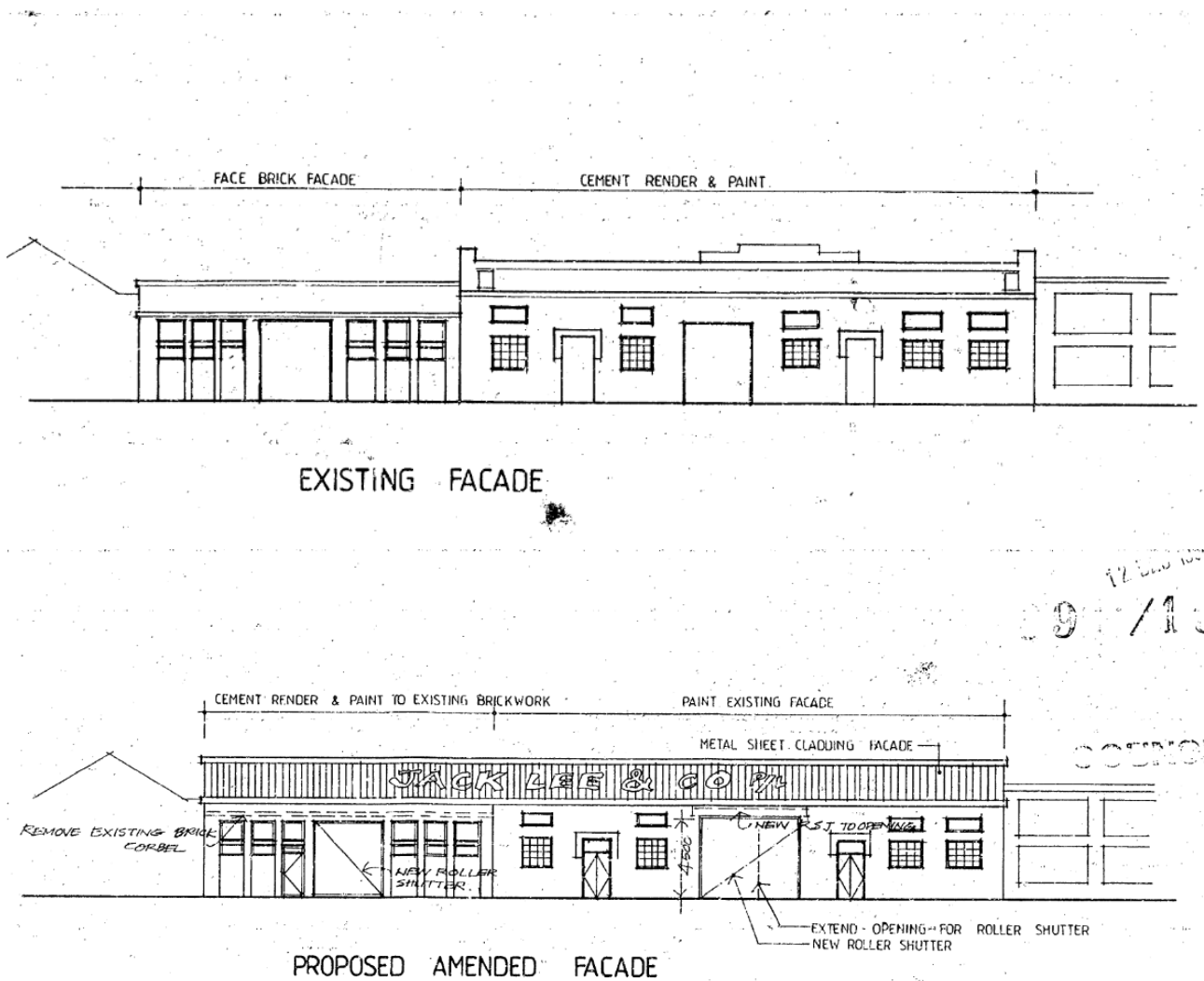


Figure 11 – Detail from 1987 plans showing alterations to façade of subject site  
Source: NSW Spatial Services, SIX Maps, with Urbis overlay

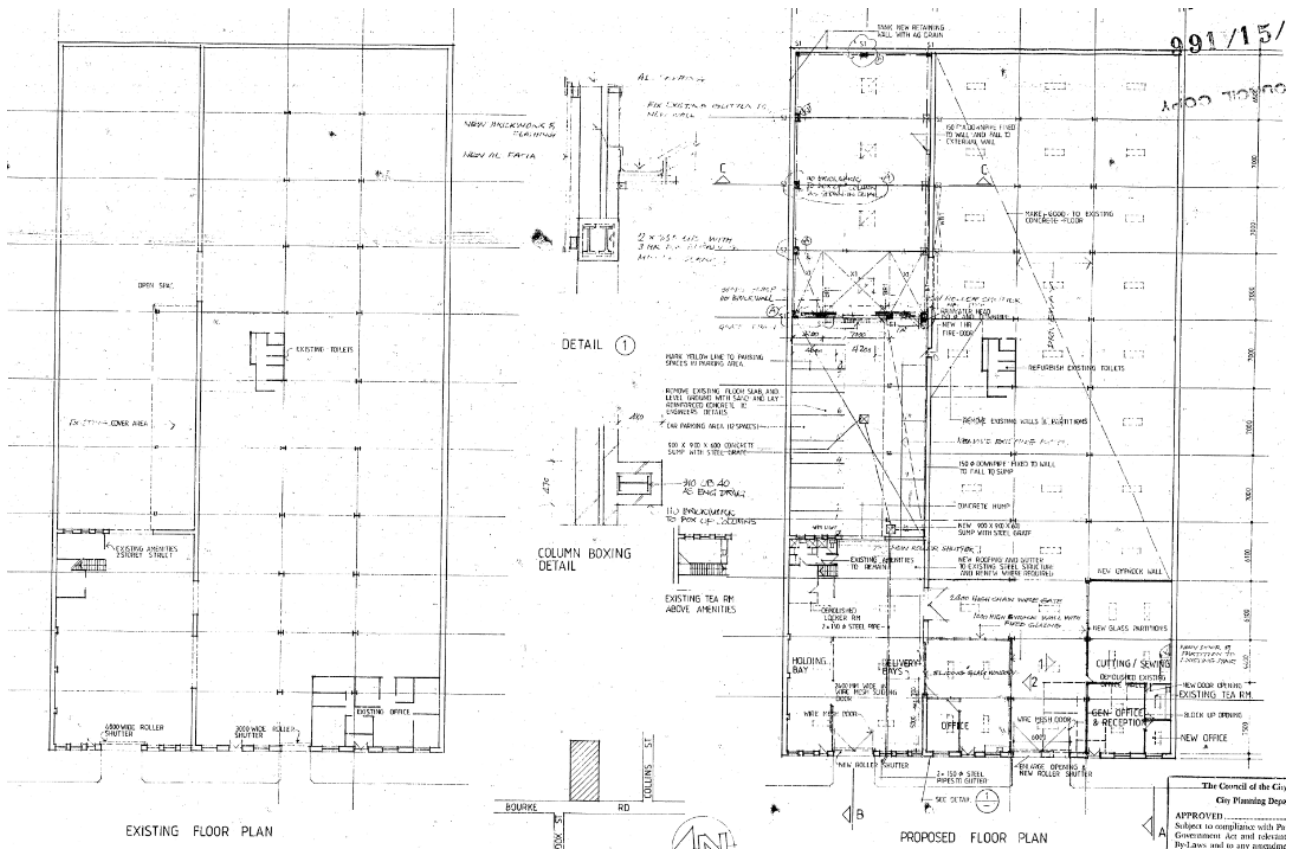


Figure 12 – Detail from 1987 plans showing alterations to interior of subject site  
Source: NSW Spatial Services, SIX Maps, with Urbis overlay



Figure 13 – Detail from 1943 aerial, showing buildings on subject site  
Source: NSW Spatial Services, SIX Maps, with Urbis overlay





Figure 14 – Detail from 1955 aerial, showing buildings on subject site  
 Source: NSW Spatial Services, *Historical Imagery*, with Urbis overlay



Figure 15 – Detail from 1982 aerial, showing buildings on subject site  
 Source: NSW Spatial Services, *Historical Imagery*, with Urbis overlay



Figure 16 – Detail from 1991 aerial, showing buildings on subject site – note first appearance of rear building at no. 28-30  
 Source: NSW Spatial Services, Historical Imagery, with Urbis overlay



Figure 17 – Detail from 2004 aerial, showing buildings on subject site – note new roof cladding to all buildings  
 Source: NSW Spatial Services, Historical Imagery, with Urbis overlay

## 3. PHYSICAL EVIDENCE

### 3.1. SETTING

The subject site is located on the south side of Bourke Road, within the suburb of Alexandria. Bourke Road is identified as a major thoroughfare, extending from Surry Hills to Mascot.

As discussed, this area of Alexandria is historically associated with industrial and warehouse buildings. The industrial use of this area was particularly prominent in the Inter-War period. Much of the surrounding development is indicative of the former industrial area. Several of the surrounding buildings are used as showrooms, furniture stores and business parks.

Owing to the various stages of development within the area the subdivision pattern is not consistent. However, various parks, restaurants and recreational areas have been included as part of new development within the area, serving the population of local workers and residents from around the wider Alexandria / Green Square catchment.

Other characteristics of the surrounding environment include the Alexandra Canal (Shea's Creek), Green Square Library, and the Green Square train station. Green Square, for its part, is currently undergoing substantial renewal as a new high-density, mixed-used precinct in line with the City of Sydney's Southern Employment Lands strategy.

Under the Sydney DCP 2012, the site is located within the East Alexandria locality within the Southern Employment Lands. The following locality statement for East Alexandria has been reproduced in full from the DCP:

*This locality is generally bound by Mandible Street, Wyndham Street, Botany Road, Johnson Street, O'Riordan Street and the Sydney Water easement between O'Riordan Street and Bourke Road.*

*It will be a thriving, evolving employment neighbourhood in transition between traditional industrial land uses and higher density commercial and business support services. These uses will support the function of the Green Square Town Centre as the major Strategic Centre for the southern part of the City.*

*The character of the existing industrial buildings is likely to change over time and the extended street network and improved public domain will make the locality an attractive location for new businesses.*

*Landscaping along the water channel, linking to the Liveable Green Network, will provide new bike and pedestrian links. New east-west streets will also provide improved connectivity and street frontages.*

*Within walking distance of the facilities and public transport options of the Green Square Town Centre, the provision of affordable rental housing may be considered in appropriate locations.*





Figure 18 – Location of subject site within the broader metropolitan context  
Source: Urbis, 2021



Figure 19 – View facing north-east along Bourke Road, at intersection with Bowden Street  
Source: Google Maps, 2022





Figure 20 – View facing south-west along Bourke Road, south of intersection with Elizabeth & O’Riordan Streets  
Source: Google Maps, 2022

## 3.2. SUBJECT SITE

As noted above, the site comprises 2 properties located at 28 & 30-32 Bourke Road. At the exterior, introduced cladding to the parapets of the buildings provides the appearance of a single structure.

28 Bourke Road contains 2 individual buildings which appear to have been constructed within the second half of the 20<sup>th</sup> century. These buildings, which are single-storey in height and appear to be of brick and steel construction, with a semi-covered breezeway providing access between the two.

30-32 Bourke Road contains one, single-storey built form which is notable for its double-height volume and sawtooth roof profile (although the roof cladding appears to be largely introduced), which are both characteristic elements of post-War industrial buildings. As with the buildings at 28 Bourke Road, the structure at no. 30-32 is also constructed of brick and structural steel. The interior of the building also includes some lightweight partitions which have been introduced for the purposes of creating small office spaces.

The following images were taken during a site inspection carried out by Urbis Heritage on 7 December 2021.



Figure 21 – Primary frontage of site, viewed from Bourke Road





Figure 22 – General view of the interior of no. 30-32



Figure 23 – Lightweight partitions creating office space in no. 30-32



Figure 24 – Detail of eastern wall to building at no. 30-32

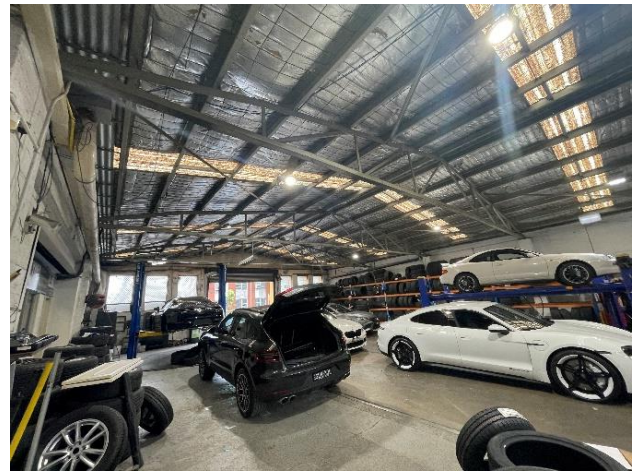


Figure 25 – General view of the interior of the front building at no. 28



Figure 26 – Rear of the front building at no. 28



Figure 27 – Semi-covered breezeway between the 2 built forms at no. 28



Figure 28 – Entrance to rear building at no. 28, from the breezeway



Figure 29 – General view of the interior of the rear building at no. 28



## 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.

As mentioned in Section 1.3 above, the site is **not** a listed heritage item, **not** located within the boundaries of any Heritage Conservation Area, and **not** located in the vicinity of any heritage items as listed under the Sydney LEP 2012 or any other statutory planning instrument.

Notwithstanding the absence of any heritage listings, below we assess the potential heritage significance of the subject site as a group of industrial buildings older than 50 years, which is an identified building typology under the City of Sydney's planning controls.

### 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 1 – Assessment of heritage significance, 28-32 Bourke Road, Alexandria

Criterion	Significance assessment
<b>A – Historical significance</b> <i>An item is important in the course or pattern of the local area's (or NSW's) cultural or natural history.</i>	<p>The subject site is located within an area of Alexandria that is historically associated with early industrial pursuits.</p> <p>The subject site, comprising two original primary structures which have been amalgamated, were both constructed in the mid-20th century. While the site is therefore indicative of the development of Alexandria during this period, the buildings are not of any inherent historical merit insofar as they do not meaningfully contribute to this historical narrative. To our knowledge, the buildings are not, in themselves, associated with any particular historical event or period.</p> <p>The subject property does not, therefore, meet the threshold for heritage listing under this criterion.</p>
<b>B – Associative significance</b> <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 (or NSW's) cultural or natural history.</i>	<p>The subject site has no known significant associations with the life or works of a person or group of persons of importance in the history of the local area.</p> <p>The subject property does not, therefore, meet the threshold for heritage listing under this criterion.</p>
<b>C – Aesthetic significance</b> <i>An item is important in demonstrating aesthetic characteristics and/or a high degree</i>	<p>While the building retains some degree of legibility as a remnant example of a key-period industrial building within the local area, despite its external and internal modifications, it cannot be considered an example of creative or technical achievement and, as such, does not meet the threshold for listing under this criterion. It is noted that changes over time including the amalgamation of the buildings and the resultant overcladding, internal layout</p>

Criterion	Significance assessment
<i>of creative or technical achievement in the local area (or NSW).</i>	<p>changes, and replacement of original doors and windows, have significantly degraded any potential historical integrity.</p> <p>The subject property does not, therefore, meet the threshold for heritage listing under this criterion.</p>
<b>D – Social significance</b>  <i>An item has strong or special association with a particular community or cultural group in the local area (or NSW) for social, cultural or spiritual reasons.</i>	<p>There are no known significant social associations within the subject property.</p> <p>The subject site does not meet the threshold for individual heritage listing under this criterion.</p>
<b>E – Research potential</b>  <i>An item has potential to yield information that will contribute to an understanding of the local area's (or NSW's) cultural or natural history.</i>	<p>The subject site features buildings of a common typology and therefore does not demonstrate any specific research potential. The buildings demonstrate construction materials and techniques which were common at the time of their respective developments.</p> <p>The subject site does not meet the threshold for individual heritage listing under this criterion, with respect to built heritage.</p> <p>It is beyond the scope of this report to assess the archaeological potential of the site.</p>
<b>F – Rarity</b>  <i>An item possesses uncommon, rare or endangered aspects of the local area's (or NSW's) cultural or natural history.</i>	<p>The subject building is not a rare example of its type within the local area or, more broadly, within the City of Sydney, forming part of a substantial collection of mid-20<sup>th</sup> century industrial / warehouse structures within the City of Sydney's southern suburbs.</p> <p>The subject site cannot, therefore, be considered rare or endangered and, as such, this criterion cannot be fulfilled.</p>
<b>G – Representative</b>  <i>An item is important in demonstrating the principal characteristics of a class of the local area's (or NSW's):</i> <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 buildings present as utilitarian industrial structures, the likes of which were constructed all throughout Sydney's inner-southern suburbs during the mid-20<sup>th</sup> century. The buildings in question do not, however, demonstrate any particular technical or creative achievement and are not considered important or prominent representative examples of their type, being common examples of the type which have been heavily modified over time.</p> <p>As such, this criterion is unable to be fulfilled.</p>

## 4.3. STATEMENT OF SIGNIFICANCE

The site does not fulfil any of the criteria which would warrant its heritage listing. It is not able to demonstrate any historical, associative, aesthetic, social, or representative significance, nor any research potential or rarity value. The buildings are common examples of light industrial development from the Inter-War period which do not meaningfully demonstrate any values which would warrant listing.

## 5. IMPACT ASSESSMENT

Below, the proposed works are discussed with relation to the applicable statutory and non-statutory planning controls for the site as applicable to heritage.

### 5.1. SYDNEY LEP 2012

The table below provides an assessment of the proposal against the relevant provisions for heritage conservation as found in the Sydney LEP 2012.

Table 2 – Assessment against Sydney LEP, part 5.10

Clause	Response
<b>(1) Objectives</b>	<p>The proposed development would not entail work to a heritage item, nor to a site within a conservation area or in the vicinity of listed heritage items. There would therefore be no impacts from the proposal on any listed heritage items, including on their fabric and settings.</p> <p>Additionally, an assessment of the potential significance of the subject site has been carried out in this HIS, in which it has been found that the site does not meet the threshold for potential listing as a heritage item.</p> <p>Accordingly, the proposed development would not generate any adverse impacts from a built heritage perspective.</p> <p>It is beyond the scope of this report to assess the historical or Aboriginal archaeological potential of the site.</p>
<b>(4) Effect of proposed development on heritage significance</b>	<p>This HIS has been prepared in partial fulfilment of clause 18 of the SEARs for SSD-38600121, with respect to built heritage considerations.</p>
<b>(5) Heritage assessment</b>	<p>Due to the lack of established or potential heritage significance associated with the site – including the existing buildings and the surrounding context – it is assessed that the proposed development would not generate any adverse impacts from a built heritage perspective.</p>

### 5.2. SYDNEY DCP 2012

The tables below provide an assessment of the proposal against the relevant provisions for the locality and for heritage as contained in the Sydney DCP 2012.

#### 5.2.1. Section 2 – Locality Statements

The proposed development is discussed below in relation to the relevant principles for the East Alexandria locality, as contained in Section 2.10.4 of the Sydney DCP 2012.

Table 3 – Assessment against Sydney DCP 2012, Section 2.10.4

Principle	Discussion
<i>(a) Development must achieve and satisfy the outcomes expressed in the character statement and supporting principles.</i>	<p>The proposed development responds to, and will assist with achieving, the desired outcomes for the locality as expressed in the character statement.</p> <p>The character statement recognises that the former industrial character and uses of the area are likely to change in the future and that the existing urban structure will attract new, higher-density commercial and ancillary uses. The</p>



Principle	Discussion
	proposed development will leverage the site's advantageous location in proximity to higher-density residential uses around the Green Square town centre.
<i>(g) Encourage higher density flexible office space and hi-tech industries that adopt best practice environmental standards and contribute positively to the public domain.</i>	<p>The proposed use will be a higher-density commercial use in keeping with the desired future character of the locality.</p> <p>The current application is for a concept approval only, however it is anticipated that the future detailed design will align with the objectives of the character statement with respect to best practice environmental standards and positive public domain outcomes.</p>

## 5.2.2. Section 3 – General Provisions

Table 4 – Assessment against Sydney DCP 2012, Section 3

Provision	Response
<b>3.9 Heritage</b>	
<b>3.9.1 Heritage Impact Statements</b>	
<p>(2) <i>The consent authority may not grant consent to a development application that proposes substantial demolition or major alterations to a building older than 50 years until it has considered a heritage impact statement, so as to enable it to fully consider the heritage significance of a building and the impact that the proposed development has on the building and its setting.</i></p> <p>(3) <i>A Heritage Impact Statement is to be prepared by a suitably qualified person, such as a heritage consultant. Guidelines for the preparation of Statements of Heritage Impact are available on the website of the Heritage Branch, NSW Department of Planning at <a href="http://www.heritage.nsw.gov.au">www.heritage.nsw.gov.au</a>.</i></p> <p>(4) <i>The Heritage Impact Statement is to address:</i></p> <p>(a) <i>the heritage significance of the heritage item or the contribution which the building makes to the heritage significance of the heritage conservation area;</i></p> <p>(b) <i>the options that were considered when arriving at a preferred development and the reasons for choosing the preferred option;</i></p>	<p>(2) This HIS has been prepared as a requirement for the SSD application and includes an assessment of the potential heritage significance of the subject buildings, which are older than 50 years. An assessment of significance carried out in Section 4 of this report has assessed that the buildings do not demonstrate significance and do not meet the threshold for heritage listing. Historical and physical evidence of the site shows that the buildings have been substantially altered over time including replacement of the roof materials, internal modifications and substantial alterations of the primary façades. As a result, the original buildings are no longer discernible from Bourke Road owing to alterations the buildings' façade in the late 1980s.</p> <p>It is therefore concluded that the proposed demolition of the buildings will not generate any adverse or unreasonable heritage impacts. Having regard for the broader context of the site and the integrity and the relative significance of the buildings and component elements, the proposed demolition is deemed an appropriate response.</p> <p>(3) This HIS has been prepared in accordance with the relevant Heritage NSW guidelines.</p> <p>(4) As follows:</p> <p>(a) The assessment of significance carried out in Section 4 of this HIS has found that the subject buildings do not meet the threshold for heritage listing.</p>

Provision	Response
<p>(c) <i>the impact of the proposed development on the heritage significance of the heritage item, heritage items within the vicinity, or the heritage conservation area;</i></p> <p>(7) <i>When giving consent to the full or partial demolition of a heritage item, a building in a heritage conservation area, or a building older than 50 years, Council may require photographic recording of the building as a condition of consent.</i></p>	<p>(b) The proposed concept will not generate any heritage impacts.</p> <p>(c) The proposed concept will not generate any heritage impacts. No heritage items or conservation areas are located in the vicinity of the site.</p> <p>(7) Relevant recommendations have been included in Section 6 of this HIS.</p>

### 3.10.1 Warehouses and industrial buildings older than 50 years

Objectives	
<p>(a) <i>Conserve warehouse and industrial buildings older than 50 years and ensure that alterations, additions and adaptive re-use maintain the legibility of the historic use.</i></p> <p>(b) <i>Encourage the conservation of existing warehouse buildings and fabric and ensure that alterations and additions are sympathetic in scale and style to the existing building.</i></p>	<p>These provisions only relate to “alterations and additions to warehouse buildings that are heritage items on Schedule 5 of the Sydney Local Environmental Plan 2012, draft heritage items or are located within a Heritage Conservation Area.” Notwithstanding, this HIS has included an assessment of the potential heritage significance of the subject buildings, noting that they are warehouse / industrial buildings older than 50 years.</p> <p>As found in the significance assessment, the subject site does not meet the threshold for heritage listing nor do the buildings maintain the significant character of former warehouse buildings, owing to the high degree of changes undertaken to them over time. As such, the proposed demolition, in this instance, would not engender any negative heritage impacts.</p> <p>Consequently, there presents an opportunity to redevelop the site and replace the existing structures with a well-designed new building which will be commensurate with the future use and character of the locality.</p>

## 5.3. HERITAGE NSW 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 5 – Assessment against HNSW guidelines

Question	Discussion
<b>General questions</b>	
<i>The following aspects of the proposal respect or enhance the heritage significance of the item or conservation area for the following reasons:</i>	The proposed development would not entail work to a heritage item, nor to a site within a conservation area or in the vicinity of listed heritage items.

Question	Discussion
	<p>The potential heritage significance of the existing buildings has been assessed in Section 4 of this HIS, in which it has been found that the buildings do not meet the threshold for listing as heritage items due to a lack of assessed significance.</p> <p>Accordingly, there presents an opportunity to redevelop the site and replace the existing structures with a well-designed new building which will be commensurate with the future use and character of the locality.</p>
<p><i>The following aspects of the proposal could detrimentally impact on heritage significance.</i></p> <p><i>The reasons are explained as well as the measures to be taken to minimise impacts:</i></p>	<p>The proposal involves demolition of a collection of Inter-War warehouse / industrial buildings that is over 50 years (albeit not heritage listed, nor within the vicinity of a heritage item or heritage conservation area). However, as discussed, the site is of no established heritage significance, thereby presenting an opportunity to the site in a manner which is commensurate with the future character of the locality. Refer to the discussion above.</p>
<p><i>The following sympathetic solutions have been considered and discounted for the following reasons:</i></p>	<p>None known.</p>
Demolition of a building or structure	
<p><i>Have all options for retention and adaptive re-use been explored?</i></p> <p><i>Can all of the significant elements of the heritage item be kept and any new development be located elsewhere on the site?</i></p> <p><i>Is demolition essential at this time or can it be postponed in case future circumstances make its retention and conservation more feasible?</i></p> <p><i>Has the advice of a heritage consultant been sought? Have the consultant's recommendations been implemented? If not, why not?</i></p>	<p>Adaptive reuse of the existing structures – including salvage of existing elements – is not necessary from a heritage perspective due to the lack of assessed significance of the buildings.</p> <p>Demolition of the existing structures is therefore determined to generate no adverse heritage impacts.</p>

## **6. CONCLUSION & RECOMMENDATIONS**

### **6.1. GENERAL CONCLUSION**

This HIS has been prepared to assess the potential impact of the proposed development from a heritage perspective.

The subject site is not identified as a heritage item, is not located within a heritage conservation area, and is not located in the vicinity of any listed heritage items. The site contains warehouse / industrial buildings which date to the Inter-War period, the potential significance of which has been assessed in Section 4 of this HIS. The assessment has found that the buildings do not meet the threshold to be considered for listing as heritage items, owing to a lack of assessed historical, associative, aesthetic, social, or representative significance, and an absence of rarity value or research potential. As such, the proposed, in-principle demolition of the existing buildings would not generate any adverse heritage impacts.

Additionally, it is found that the proposed development is commensurate with the broader strategic objectives of redevelopment within the Southern Employment Lands and demonstrates an orderly approach to development within the area. There will be no impacts on any heritage items or conservation area as a result of the works, including on any significant fabric, settings, or views.

As such, and having regard for the recommendations made below, the proposed development is recommended for approval on heritage grounds.

### **6.2. RECOMMENDATIONS**

Notwithstanding the overall positive assessment of the proposal which has been made in this HIS, the following recommendations are recommended in order to best mitigate any potential built heritage impacts:

#### **6.2.1. Archival recording**

Prior to the commencement of any works on the site (following a Stage 2 development application), the existing buildings at the site are to be archivally recorded in accordance with the relevant guidelines published by the Heritage Council of NSW. The archival recordings should capture the existing buildings, externally and internally, and include images of their current setting.

# DISCLAIMER

This report is dated 6 July 2022 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Alexandria Property Development Pty Ltd (**Instructing Party**) for the purpose of a State-Significant Development Application (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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