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23 September 2025

Department of Planning, Housing and Infrastructure  
Locked Bag 5022  
Parramatta NSW 2124

To whom it may concern,

## **SSD-77240466 – OPAL HEALTHCARE BAYVIEW DEVELOPMENT – PRELIMINARY HISTORICAL ARCHAEOLOGICAL AND BUILT HERITAGE ADVICE**

This Preliminary Environmental Heritage Assessment (PEHA) is submitted to the Department of Planning, Housing and Infrastructure (**DPHI**) on behalf of Principal Healthcare Finance Pty Limited (**Opal Healthcare**) in support of a State Significant Development Application (**SSDA**) (SSD-77240466) for a 177 bed residential aged care facility (**RACF**) at 36-42 Cabbage Tree Road, Bayview (**the site**).

### **1. INTRODUCTION**

Bloompark on behalf of Opal HealthCare ('the Proponent') are proposing the redevelopment of part of the Opal Healthcare Bayview development which is located on a part of the existing Aveo Bayview Gardens bounded by Annam Road and links to Cabbage Tree Road, Bayview, NSW, legally described as Lot 121 DP789400 ('the subject area'). The subject area covers an area of approximately 6,000m<sup>2</sup>(Error! Reference source not found.). The subject area is located approximately 2.5 km north of the Sydney CBD, within the City of Northern Beaches Local Government Area.

The SSD will seek approval for the construction of a 177 bed residential aged care facility and Torrens Title subdivision of the site from Aveo Bayview Gardens Retirement Living (**Aveo BGRL**). . The SSD also includes alterations and additions to the existing community centre located adjacent to the subject area. This building has not been included in the subject area for the assessment as the works include structural and internal refurbishment, which does not require ground disturbance.

Approval for the proposed development is being sought via State Significant Development Application SSD-77240466 under Division 4.7 of the *Environmental Planning and Assessment Act 1979* (NSW). Please note that per Section 4.41 (formerly s 89J) of the *EP&A Act 1979*, the approval pathways provided by the *Heritage Act 1977* are silenced, however the remainder of the Act applies as with the guidelines for its implementation.

The Planning Secretary's Environmental Assessment Requirements (SEARs) were issued for SSD-77240466 on 18 February 2025. This Preliminary Environmental Heritage Assessment addresses the following relevant SEARs set out in the table below.

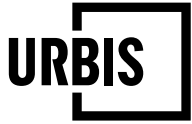


Table 1 – SEARs requirements

<b>SEARs Request</b>	<b>Documentation</b>
22. Environmental Heritage  Where there is potential for direct or indirect impacts on environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment ( <u>where required</u> ), in accordance with the relevant guidelines.	Statement of Heritage Impact  Archaeological Assessment

Based on the *Archaeological Assessment Guidelines* 1996, and *Investigating Heritage Significance* 2021, this document presents a methodology to determine whether an Archaeological Assessment and/or Statement of Heritage Impact is necessary to support the Environmental Impact Statement (EIS) for this project.



GDA 1994 MGA Zone 56

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Project No: P0058100  
Project Manager: Ali Byrne

Subject Area

**REGIONAL LOCATION**  
Opal Bayview Residential Aged Care Facility  
Bloompark

Figure 1 – Regional location of subject area



## 2. PRELIMINARY HISTORICAL RESEARCH

The historical context of an area provides the basis for assessing what may be retained in the ground as archaeological material. The following is an overview of the subject area provided in the Aboriginal Cultural Heritage Assessment undertaken for SSD-77240466:<sup>1</sup>

Bayview was named for its outlook onto Pittwater and was officially recognised when Bayview Post Office was opened in 1882. By 1821 the first land grants had occurred, 200 acres to Robert McIntosh and 80 acres each to Peter Patullo and Jeremiah Bryant. Figure 8 below shows Bayview Gardens entirely within Bryant's allotment. It is likely that land clearing began soon after. During the nineteenth century several small farms, producing fruit, vegetables and poultry, developed along this sheltered north-facing shore. Bayview became a holiday destination when the coach service from Manly extended there in the 1880s. It was also reached by boat from Sydney with visitors staying in guesthouses. During the second half of the twentieth century Bayview became a residential suburb (Northern Beaches Council online). Figure 7 below shows an extract from a map of the coastal area between Broken Bay and Middle Harbour in 1842 with the location of Bayview Gardens in red.

In 1924 John Orr settled in Bayview purchasing Winnererremy Swamp at the location of the current Bayview Golf Club to the south and east of the subject area. Most of the land on which the golf course now stands was a low-lying marsh fed from the surrounding hillsides (Bayview Golf Club 1998).

Sir Edward Hallstrom, director of the Taronga Park Zoological Gardens from 1941-1967, set up a privately funded flora and fauna sanctuary within the subject site that persisted until shortly before his death in 1970, when the land was sold to become Bayview Gardens. The land was purchased by Hallstrom in 1947 and became known the 'Koala Sanctuary', where koalas were rehabilitated and reintroduced to their natural environment. Hallstrom's vision was 'zoos without cages'. This property along with others owned by Hallstrom also provided feed for Taronga Zoo (Pittwater Online News 2016). John Bungey, landscape designer, was involved in the development of Bayview Gardens from 1975. Bungey reported to the Manly, Warringah and Pittwater Historical Society that the large-scale development attempted to retain much of the native vegetation including Scribbly Gum, Swamp Mahogany and Angophora. The development took approximately 10 years to complete (Pittwater Online News 2012).

Figure 9 to Figure 11 below show aerial photographs of Bayview Gardens throughout the latter half of the 20<sup>th</sup> century. Figure 9 shows Bayview Gardens in 1951 presumably from the time of Hallstrom's ownership. Some mature trees are present along with rows of new plantings. These are possibly in line with Hallstrom's vision of an open-air animal sanctuary providing habitat and feed for native animals. There is an access road leading to two structures within the current subject area. In 1971 the vegetation has matured across the majority of the site. Additional structures have been constructed, predominantly in the eastern portion of the Bayview Gardens. By 1986 Bayview Gardens has been predominantly developed except for the western portion of the subject area.

Based on the above, no specific historical activity can be attributed to the subject area prior to 1947, at which time Sir Edward Hallstrom set up his Koala Sanctuary. Extensive development and ground disturbing activities associated with the construction of the extant Bayview Gardens is likely to have involved the removal of all landscaping and standing buildings associated with the wildlife sanctuary within the subject area.

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<sup>1</sup> Urbis, 2025. *Aboriginal Cultural Heritage Assessment: Opal Bayview, Annam Road, Bayview NSW*



Figure 3 – Extract from Map of the coastal area between Broken Bay and Middle Harbour, parishes of Narrabeen and Manly Cove 1842, showing the approximate location of the Bayview Gardens in red, and ‘Winnerenemy’ Swamp directly to the southeast.

Source: State Library of New South Wales Z/M4 811.14/1842/1



Figure 4 – Parish of Narrabeen, County of Cumberland, 1886, showing the approximate location of Bayview Gardens in red. Note land directly to the southeast is still indicated as swamp by this time.

Source: NSW Department of Lands, MAP G8971.G46 svar (Copy 1)

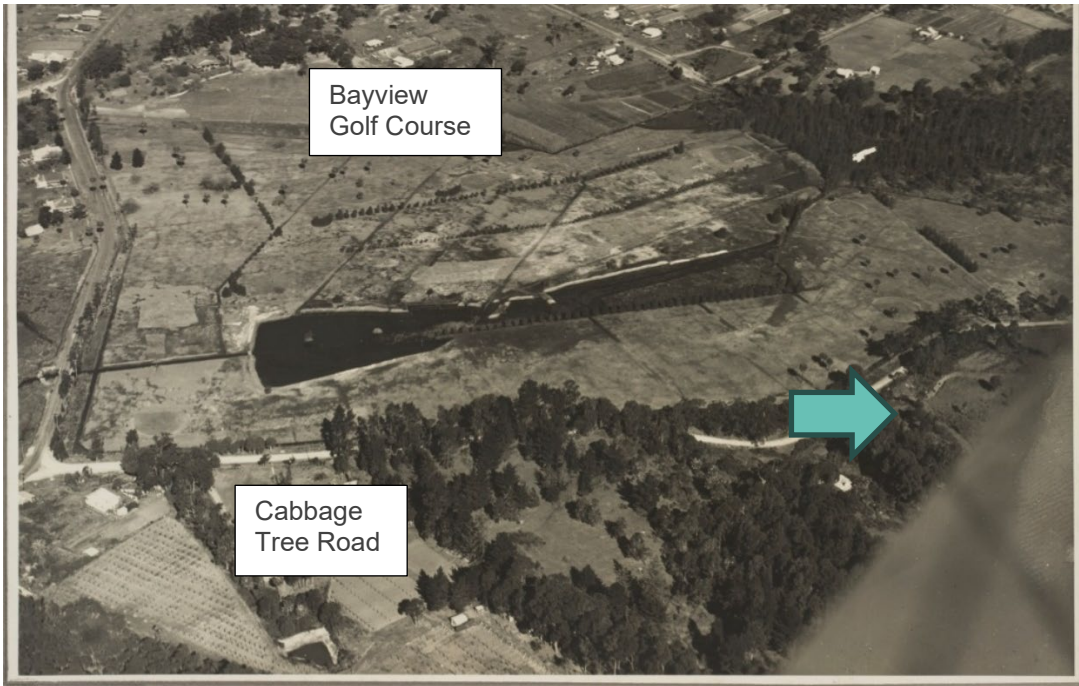


Figure 5 – Aerial view of Bayview Golf Course, 1930s, with a portion of the later site of Bayview Gardens seen to the right.

Source: State Library NSW, [54 aerial views of Sydney golf courses] / Hall & Co., ca. 193-?



Figure 6 – Sir Edward Hallstrom with koala at Taronga Zoo, 1964

Source: National Archives of Australia, A1200, L47871



Figure 7 – Aerial image of Bayview Gardens; approximate boundary of subject area shaded orange; 1951

Source: NSW Government, Historical Imagery Viewer



Figure 8 – Aerial image of Bayview Gardens; approximate boundary of subject area shaded orange; 1971

Source: NSW Government, Historical Imagery Viewer



Figure 9 – Aerial image of Bayview Gardens; approximate boundary of subject area shaded orange; 1986

Source: NSW Government, Historical Imagery Viewer

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Information Centre  
 Gregory's Reference  
 Map 93, A 13-14

Figure 10 – Newspaper advertisement for the Bellbird Estate, Bayview, 1972, "...formerly a well-known sanctuary for birds, koala bears and other zoological fauna."

Source: *The Australian Jewish Times* (Sydney NSW: 1953-1990) Thu 14 Dec 1972

### 3. HERITAGE LISTINGS

This section provides an overview of government listings and the most commonly available research resources for historical archaeology and built heritage in New South Wales. The listings presented are exhaustive, however the remaining research in this section is preliminary. In certain circumstances further investigation is required and a full Historical Archaeological Assessment (HAA) or Heritage Impact Statement (HIS) would present expanded historical research. However, as outlined in Section 10, the present report has found no further investigation is required for the subject site.

#### 3.1. STATUTORY LISTINGS

##### *Environment Protection and Biodiversity Conservation Act 1999*

Historical archaeological items listed on the World Heritage List ('WHL'), the National Heritage List ('NHL') and the Commonwealth Heritage List ('CHL'), are protected under sections 15A, 15C, 27A and 27C of the EPBC Act *Environment Protection and Biodiversity Conservation Act 1999* (Cth) ('EPBC Act'). Properties and places listed on the WHL, NHL or CHL, are included in the Australian Heritage Database ('AHD'). The AHD also includes places under consideration, or that may have been considered, for any one of these lists.

***New South Wales Heritage Act 1977***

Historical archaeological items listed on the State Heritage Register ('SHR') or subject to an Interim Heritage Order ('IHO'), are protected under Part 4 of the *Heritage Act 1977* (NSW) ('Heritage Act'). Historical archaeological items that are listed on the SHR or that are subject to an IHO are included in the State Heritage Inventory ('SHI'). Local Environmental Plan heritage items are also listed in the State Heritage Inventory, in addition to items owned or managed by State Agencies, which are listed on those Agencies' Heritage and Conservation Registers, in accordance with Section 170 of the Heritage Act.

Unlisted or unexpected historical 'relics' are protected under Part 6, Division 9 of the *Heritage Act 1977*.

***Environmental Planning and Assessment Act 1979***

Local Environmental Plans (LEPs) are made under the *Environmental Planning and Assessment Act 1979* (EP&A Act). The Warringah LEP 2011 is applicable to the present subject area. The Warringah LEP 2011 addresses heritage in Section 5.10, with a list of identified and protected heritage items provided under Schedule 5 of the LEP.

The AHD, CHL, NHL, SHR and LEP were searched on 19 March 2025. Table 1 below provides a response to each of these listings in relation to the subject area.

Table 2 – Heritage Listings

<b>Heritage Listings</b>	<b>Response</b>
Commonwealth Heritage List	The subject area does not contain, nor is it located within proximity of, any items listed on the CHL.
National Heritage List	The subject area does not contain, nor is it located within proximity of, any items listed on the NHL.
Australian Heritage Database	The subject area does not contain, nor is it located within proximity of, any items listed on the AHD.
State Heritage Inventory	The subject area does not contain, nor is it located within proximity of, any items listed on the SHI, including items on the State Heritage Register, Section 170 registers and locally listed LEP items.
Local Environmental Plan	The subject area does not contain, nor is it located within proximity of, any items listed on the Warringah LEP 2011.

## 4. CRITERIA FOR BUILT HERITAGE ASSESSMENTS

The Planning Secretary's Environmental Assessment Requirements (SEARs) requires a Statement of Heritage Impact, prepared in accordance with the relevant guidelines, if the proposed development may impact heritage items. This section provides the methodology for deciding whether an assessment is necessary per the guidelines.

The relevant guidelines are as follows:

- Heritage Council of NSW 2021, *Investigating Heritage Significance*

In accordance with the guideline above, a series of heritage database searches were undertaken (see Table 1 – Heritage Listings) to establish the presence of built heritage items within the subject area. The search revealed there are no listed items in the subject area or within sightlines (see Figure 11). Based on the above, a Heritage Impact Statement is therefore considered unnecessary for SSD-77240466.



Figure 11 – Built heritage items

## 5. CRITERIA FOR ARCHAEOLOGICAL ASSESSMENTS

The Planning Secretary’s Environmental Assessment Requirements (SEARs) requires an Archaeological Assessment, prepared in accordance with the relevant guidelines, if the proposed development may impact archaeological resources. This section provides the methodology for deciding whether an assessment is necessary per the guidelines.

The relevant guidelines are as follows:

- Heritage Office and Department of Urban Affairs and Planning 1996, *Archaeological Assessment Guidelines*
- Heritage Office of the Department of Planning 2006, *Historical Archaeology Code of Practice*
- Heritage Branch of the Department of Planning 2009, *Assessing Significance for Historical Archaeological Sites and Relics*

The NSW guidelines for Archaeological Assessments state that assessments are *essential* in the following cases:

Table 3 – Criteria for Essential Archaeological Assessments

Criteria for Essential Archaeological Assessments	Response
A site is identified as having archaeological potential in an archaeological zoning plan	No AZP was available for the study area.
The site is known or believed to contain ‘relics’ and will therefore require the issue of a permit under section 140 of the Heritage Act (NSW) 1977  Note: Ignore S140 clause when acting under SSD	Based on the preliminary research presented in this document, the site does not contain relics, an archaeological assessment is not required.
The consent authority requires an assessment as part of supporting documentation for a development, building or dredging application	The SEARs requires an assessment if needed. This document is provided to indicate that an assessment is not needed for the subject area.
Development, building or dredging activity on the site could disturb archaeological features.	Based on the preliminary research presented in this document, these activities are unlikely to disturb archaeological features.

The NSW guidelines for Archaeological Assessments states that assessments are *desirable* in the following cases:

- An understanding of archaeological potential and significance is required as part of a site-specific study, such as a conservation management plan

- Information on archaeological resources is required as part of broad scale land use planning activities, such as subdivision plans
- A Statement of Environmental Effects or Environmental Impact Statement is being prepared for a site or area that contains archaeological resources
- A Heritage Study, heritage register or environmental planning instrument is being prepared for an area and potential archaeological sites are to be included
- A development proponent wishes to create certainty regarding possible archaeological features associated with a particular site

## 6. ARCHAEOLOGICAL POTENTIAL

Based on the information provided in Sections 2 and 3, there are three identified phases of historical use of the site. These include:

- Phase 1: 1788-1941 – Early Development and Agricultural Use
- Phase 2: 1941-1975 – Hallstrom’s Koala Sanctuary
- Phase 3: 1975-Present Day – Bayview Gardens

Given the extensive construction on site as a result of the development of the retirement village facilities, and the nature of the previous uses of the subject site, the likelihood that archaeological remains from Phases 1-3 would be present is assessed to be low.

## 7. ARCHAEOLOGICAL SIGNIFICANCE

Typically, an Archaeological Assessment is used to determine the significance of archaeological resources against standard criteria per NSW government guidelines. Although an ‘Initial Assessment’ can provide a basic overview.<sup>2</sup>

This section also considers the relationship between the term ‘archaeological resources’ used by the SEARs and the statutory term ‘relics’ in the *Heritage Act 1977*.

This section goes on to provide a preliminary assessment of the significance of the study site’s archaeological resource per the NSW Heritage Branch guidelines *Assessing Significance for Historical Archaeological Sites and ‘Relics’*.

### 7.1. ARCHAEOLOGICAL RESOURCES AND HISTORICAL RELICS

Per the guidelines and current legislation:

*Archaeological resources are ‘physical evidence of the past. While age does not necessarily determine whether an item is archaeological, the statutory definition for an archaeological ‘relic’ in New South Wales is:<sup>3</sup>*

Section 4(1) of the Heritage Act 1977

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<sup>2</sup> Heritage Office and Department of Urban Affairs and Planning 1996, *Archaeological Assessment Guidelines*

<sup>3</sup> Heritage Office and Department of Urban Affairs and Planning 1996, *Archaeological Assessment Guidelines*

“...any deposit, artefact, object or material evidence that:

(a) relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement, and

(b) is of State or local heritage significance.

Therefore, any physical evidence of past human activity can be considered an archaeological resource, even very recent structures and objects. However, not all archaeological resources reach the threshold for local or State significance under the *Heritage Act 1977* and are thus considered a ‘relic.’

- If potential relics are present at the study site, a full-scale assessment of significance is essential.
- When an archaeological resource is present but unlikely to be considered a ‘relic,’ an ‘Initial Assessment’ of significance based on basic research may be a satisfactory level of site investigation.
- If the site is unlikely to retain an archaeological resource an Archaeological Assessment is not necessary.

## 7.2. PRELIMINARY ASSESSMENT OF SIGNIFICANCE

The below criteria are taken from the NSW Heritage Branch publication *Assessing Significance for Historical Archaeological Sites and ‘Relics’*.

For the purposes of this assessment, significance is ranked as follows:

- **No Significance** – it is unlikely that any archaeological resources recovered will be attributed significance in accordance with the assessment criteria on a state or local level.
- **Local Significance** – it is likely that archaeological resources recovered will be significant on a local level in accordance with one or more of the assessment criteria.
- **State Significance** – it is likely that archaeological resources recovered will be significant on a State level in accordance with one or more of the assessment criteria.

Table 4 – Significance Criteria

Letter	Criterion	Definition	Rating
A	Historical	An item is important in the course or pattern of the local area’s, or the State’s, cultural or natural history.	<b>State</b> (See Below)
B	Associative	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 the State’s, cultural or natural history.	<b>State</b> (See Below)

Letter	Criterion	Definition	Rating
C	Aesthetic or technical	An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the local area or the State.	None
D	Social	An item has strong or special association with a particular community or cultural group in the local area, or the State, for social, cultural or spiritual reasons.	None
E	Research Potential	An item has potential to yield information that will contribute to an understanding of the local area's, or the State's, cultural or natural history.	None
F	Rarity	An item possesses uncommon, rare or endangered aspects of the local area's, or the State's cultural or natural history.	None
G	Representative	An item is important in demonstrating the principal characteristics of a class of NSW's (or the local area's) cultural or natural places; or cultural or natural environments	None

### Criterion A: Historical Significance

Sir Edward Hallstrom's work at the Bayview Koala Sanctuary contributed to the early establishment of Taronga Zoo. Hallstrom's ideas of 'zoos without cages' introduced new methods of animal keeping in NSW, focused on conservation over entertainment. This ideology is maintained in Taronga's mission statement up to the present day. Due to the historic contribution of the Koala Sanctuary to the establishment of Taronga Zoo and wider evolution of zoo keeping in NSW, if archaeological evidence associated with the Sanctuary were to survive, it would be of **State** significance.

### Criterion B: Associative Significance

Sir Edward Hallstrom was a highly influential figure, recognised for his significant contribution of over half a million dollars towards animal upkeep and breeding programs at Taronga Zoo throughout his lifetime. He was appointed director of Taronga Zoo from 1941 to 1967, with his views on conservation and 'zoos without cages' contributing significantly to the evolution of animal keeping in NSW. If archaeological resources specifically associated with Hallstrom's use of the subject area were to survive, they would be of **State** significance.

## 7.3. PRELIMINARY STATEMENT OF SIGNIFICANCE

The preliminary historical overview provided above revealed little evidence for historical activity within the subject area prior to 1947. However, archaeological resources associated with Hallstrom's Koala Sanctuary, if they remain, would likely be of associative and historical significance at a **State** level.

This is owing to Sir Edward Hallstrom's significant contribution to the evolution of animal keeping in NSW, and involvement of the subject area in the establishment of Taronga Zoo.

As a result of extensive construction and ground disturbing activities involved in the development of Bayview Gardens, the potential for archaeological remains from earlier phases of historical development to be present within the subject area has been assessed as low.

As such, the subject area is expected to retain nil or nil-low significant historical archaeological resources. Further investigation is not necessary, though works will be subject to unexpected finds and human remains procedures outlined below.

## **8. IMPACT ASSESSMENT**

The proposed development of the subject area comprises the construction of a 177 bed residential aged care facility and Torrens Title subdivision of the site from Aveo BGRL . The proposed development will include the following works:

- Demolition of the existing aged care building and driveway on the site;
- Construction of a three-storey residential aged care facility, accommodating:
  - 177 beds,
  - Basement parking,
  - Ground floor ancillary facilities;
- Construction of a community room, to be located on the Aveo BGRL site;
- Construction of a new driveway, to be located on the Aveo BGRL site;
- Torrens Title subdivision of the Opal Healthcare Bayview site from Aveo BGRL;
- Associated amenities and landscaping works;

Augmentation of, and connection to, existing utilities as required. As discussed in the preceding Section, no listed heritage or archaeological items or places have been identified within the subject area, and it is unlikely that the subject area retains any archaeological resources that would meet the threshold requirements of the definition of a 'relic' under the Heritage Act. Therefore, the works proposed under SSD-77240466 are unlikely to impact any relevant archaeological resources.

## **9. MITIGATION MEASURES**

In view of the information outlined above, it is recommended the following procedures be implemented to mitigate impacts to archaeological resources in the unlikely event that any such resources are encountered during the works proposed under SSD-77240466.

### **9.1. UNEXPECTED ARCHAEOLOGICAL FINDS PROCEDURE**

In the unlikely event that any potential archaeological resources are uncovered during any site works, the following must be undertaken:

1. All works within the vicinity of the find must immediately stop. The find location and minimum 2m buffer should be cordoned off with signage identifying the area as a 'no-go zone' to prevent accidental impact. 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. Heritage NSW should be notified of the find through a Section 146 notification. Such management may require further consultation with the approval authority, 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 site 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.

## **9.2. HUMAN REMAINS PROCEDURE**

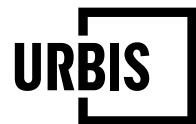
In the unlikely event that human remains are uncovered during any site works, the following must be undertaken:

1. All works within the vicinity of the find must immediately stop and the location cordoned off with signage installed to stop any accidental impact to the finds.
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 and Heritage NSW.
5. Works are not to recommence until the find has been appropriately managed.

## **10. SUMMARY**

The above findings are summarised as follows:

- No listed built and archaeological items have been identified within the subject that are protected under the EPBC Act or Heritage Act. It is unlikely there are any unlisted built items.
- A Heritage Impact Statement is therefore considered unnecessary for SSD-77240466.
- It is unlikely that the subject area retains any archaeological resources that would meet the thresholds requirements of the definition of a 'relic' under the Heritage Act due to the relatively late development of the subject area, as well as late 20<sup>th</sup> century development that is likely to have removed any earlier archaeological resources.
- Consequently, the works proposed works under SSD-77240466 are unlikely to impact any relevant historical archaeological resources.



- A Historical Archaeological Assessment is therefore considered unnecessary for SSD-77240466, subject to the unexpected finds and human remains procedures outlined above being implemented during the proposed works.

Yours faithfully,

A handwritten signature in black ink that reads "A Byrne".

Ali Byrne  
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