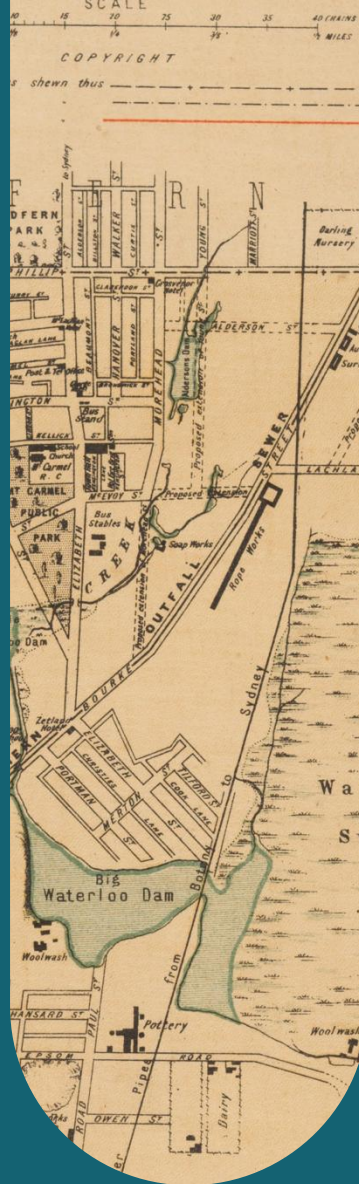




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This report has been prepared based on research by Curio Projects specialists. Historical sources and reference material used in the preparation of this report are acknowledged and referenced at the end of each section and in figure captions.

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1. Introduction

1. Introduction

1.1. Background and Purpose of this Report

This Aboriginal Due Diligence has been prepared by Curio Projects on behalf of The Trustee for Waterloo Property Unit Trust (the Applicant) to support a Housing Delivery Authority (HDA) nominated State Significant Development application (SSD-80441462) for the proposed Main Works for Waterloo Mixed Use Development at 881-885 Bourke Street, Waterloo (the study area).

This application is preceded by a separate SSDA for Early Works that prepare the Site for the proposed development (SSD-80911502). Specifically, consent is sought for the following Main Works for the Waterloo Mixed Use Development:

- Site establishment and enabling works (that were not included in the preceding Early Works SSDA);
- Construction of residential and mixed-use buildings across four development parcels, inclusive of;
 - build to rent apartments and associated amenities;
 - affordable apartments;
 - non-residential floor space including commercial premises and creative industry;
- Construction of a consolidated basement with below-ground links between development parcels, comprising car parking, plant and storage area;
- Landscaping and publicly accessible open space;
- Works to site frontages; and
- Extension and augmentation of infrastructure and services (that were not included in the preceding early Works SSDA) as required.

Development on the site was declared State Significant Development (SSD) pursuant to State Significant Declaration Order 2025 (Order) dated 17 February 2025. The Order declares development specified in EOI application 229420 dated 8 January 2025, including development for the purposes of mixed-use development (Build to Rent including affordable housing) with ground floor non-residential uses at 881-885 Bourke Street, as identified in Schedule 3, is SSD.

On 5 March 2025, the Department of Planning, Housing and Infrastructure (the Department) issued SEARs and concurrent rezoning requirements for the project.

The site is subject to an existing Voluntary Planning Agreement (VPA) that sets out dedication of public domain between four development parcels. The public domain includes a new east-west street, a through site link and public open space area (comprising future shared zones and park). The development parcels and public domain as set out in the VPA will be delivered notwithstanding the works proposed in this SSDA.

The purpose of this assessment is to identify the need for further investigation into the Heritage Impacts and whether Aboriginal archaeological potential is present or likely to be present within the study area, and whether the proposed development would be likely to harm these archaeological resources (if present).

Under requirement 21 of the SEARs issued for this project, it is noted that an Aboriginal Cultural Heritage Assessment should be included if required. Therefore, Curio recommended that an Archaeological Due Diligence Assessment be prepared as a desktop study to identify whether the site will require the above-mentioned document.

1.2. Project Background

Curio has previously prepared a combined Heritage Impact Statement and Aboriginal and Historical Archaeological Due Diligence Assessment for the Early Works component of the Waterloo Mixed Use Development at 881–885 Bourke Street, Waterloo.

The Early Works SSDA (SSD-80911502) encompassed site establishment, erosion and sediment controls, tree removal, bulk excavation for a future basement and tunnel links, construction and anchoring of a piled shoring wall and capping beam, infrastructure services coordination, and ancillary works.

The report concluded that the study area itself is not a listed heritage item at local or State level. However, it lies in proximity to several local heritage items (including the Former Sydney Water Pumping Station and Valve House and an Electrical Substation) and the State-listed Pressure Tunnel and Shafts (SHR #01630). Potential impacts to these nearby items relate primarily to sub-surface excavation, vibration, and visual context.

The archaeological due diligence concluded that the site holds nil–low potential for Aboriginal archaeology and low potential for historical archaeology due to extensive past disturbance from industrial development and warehousing. **As such, no Aboriginal Cultural Heritage Assessment Report (ACHAR) or Archaeological Assessment was identified to be required for either the early works or subsequent main works SSDAs under the SEARs.**

To address potential risk, an Unexpected Finds Procedure was recommended for both Aboriginal and historical archaeology. Should finds occur, works are to cease pending assessment, notification (to Metropolitan Local Aboriginal Land Council or Heritage NSW as relevant), and the preparation of a management plan.

1.3. The Study Area

The site is legally described as Lot 1 DP1308636 and Lot 2 DP1308636 and incorporates the addresses 207-220 Young Street, 881-885 & 887-893 Bourke St, Waterloo. The site has an area of 21,554m². It has an irregular shape, is generally flat and was recently cleared of light industrial and large format commercial buildings. The site has vehicle access from Young Street and Bourke Street.

The site is located within Gadigal Land, in the Sydney Local Government Area (LGA) and is approximately 4km south of the Sydney CBD. The site is approximately 950m walking distance east of an entrance to the Waterloo Metro Station, approximately 1.1km northeast of the Green Square Train Station and approximately 1.5km southeast of Redfern Train Station. The site is also immediately adjacent to a bus stop on Bourke Street. The Site is partly identified as within the Waterloo Town Centre (Danks Street) in the Housing SEPP.

There are a number of trees along the Danks and Young Street frontages. There are commercial and business premises to the west, high-density residential and business premises to the north, primarily high-density residential to the east and high density residential under construction to the south.

The study area has been cleared of all existing structures on site. Curio was engaged after demolition took place.



Figure 1.1: Ariel view of study area in its current state. Source: Image supplied by the proponent.



Figure 1.2: Ariel view of study area prior to demolition. Source: Six Maps

1.4. Secretary's Environmental Assessment Requirements

This Due Diligence has been prepared to address the Planning Secretary's Environmental Assessment Requirements (SEARs) issued by the Department of Planning, Housing and Infrastructure (DPHI) on 5 March 2025 for the Main Works SSDA, with specific SEAR(s) identified in the table below.

Table 1.1: SEARs relevant to this report

SEAR	Response
21. Aboriginal Cultural Heritage (if required) Where there is known, or reasonably likely, to be Aboriginal cultural heritage on or near the site demonstrate that impacts have been adequately investigated and assessed by: - Identifying that an appropriate prior planning process has already considered these impacts, e.g. a rezoning or development application, or - Providing an initial assessment of the potential impacts. If potential impacts are significant, provide an Aboriginal Cultural Heritage Assessment Report (ACHAR) which: - Identifies, describes and assesses any impacts to Aboriginal cultural heritage sites or values associated with the site. - Is prepared in accordance with relevant guidelines.	This document addresses this SEAR in regard to the possibility of requiring an Aboriginal Cultural Heritage Assessment Report (ACHAR). It has been determined that a full ACHAR is not required for the project.
22. Environmental Heritage (if required) Where there is potential for direct or indirect impact on environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (where required) in accordance with relevant guidelines.	Curio has prepared a Heritage Impact Statement that addresses this SEARs.

1.5. Limitations and Constraints

This report has been prepared using data and documentation available for the study area including archaeological reports and assessments.

The *Aboriginal Due Diligence Code of Practice* (DECCW 2010a) states that 'consultation with the Aboriginal community is not a formal requirement of the due diligence process', however, as the determinants of their own heritage, only Aboriginal people are able to provide information regarding Aboriginal cultural and social values and significance. No additional consultation with the local Aboriginal community has been undertaken as part of this assessment, and therefore no social or cultural assessment of Aboriginal heritage values has been undertaken at this time.

1.6. Authorship and Acknowledgement

This report has been prepared by Daisy Cutcliffe, Archaeologist, with review by Rebecca Agius, Senior Archaeologist and Heritage Specialist, both of Curio.

2. Statutory Context

2. Statutory Context

In NSW, heritage items and known or potential archaeological resources are afforded statutory protection under the:

- Environmental Planning and Assessment Act 1979 (NSW) (EPA Act)
- Heritage Act 1977 (NSW) (Heritage Act)
- National Parks and Wildlife Act 1974 (NSW) (NPW Act)

2.1. NSW National Parks and Wildlife Act 1974

The *NSW National Parks and Wildlife Act 1974* (NPW Act), administered by the Aboriginal Heritage Planning Section of Heritage NSW within the Department of Premier and Cabinet (DPC), is the primary legislation that provides statutory protection for all 'Aboriginal objects' (Part 6, Section 86, Section 90) and 'Aboriginal places' (Part 6, Section 84) within NSW.

An Aboriginal object is defined through the NPW Act as:

Any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction and includes Aboriginal remains.

The NPW Act provides the definition of 'harm' to Aboriginal objects and places as:

...any act or omission that:

- (a) Destroys, defaces or damages the object or place, or*
- (b) In relation to an object – moves the object from the land on which it has been situated, or*
- (c) Is specified by the regulations, or*
- (d) Causes or permits the object or place to be harmed in a manner referred to in paragraph (a), (b) or (c)*

The NPW Act also establishes penalties for 'harm' to Aboriginal objects and declared Aboriginal places, as well as defences and exemptions for harm. One of the main defences against the harming of Aboriginal objects and cultural material is to seek an Aboriginal Heritage Impact Permit (AHIP) under Section 90 of the NPW Act, under which disturbance to Aboriginal objects could be undertaken, in accordance with the requirements of an approved AHIP.

2.2. NSW Heritage Act 1977

In order to best implement and administer the protection afforded to Aboriginal objects and places as through the NPW and EP&A Acts, the (former) NSW Office of Environment and Heritage (now part of Heritage NSW) have prepared a series of guidelines with regards to Aboriginal heritage. These guidelines are designed to assist developers, landowners and archaeologists to better understand their statutory obligations with regards to Aboriginal heritage in NSW and implements best practice policies into their investigation of Aboriginal heritage values and archaeology in relation to their land and/or development. These guidelines include:

- *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (DECCW 2010a) (The Due Diligence Code of Practice).

- *Guide to Investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011a) (Guide to Investigating).
- *Code of Practice for the Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b) (Code of Practice).
- *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010c) (Consultation Guidelines).
- *Aboriginal Heritage Impact Permits, A Guide for Applicants* (OEH 2011b).

The purpose of the Due Diligence Code of Practice is to '*assist individuals and organisations to exercise due diligence when carrying out activities that may harm Aboriginal objects and to determine whether they should apply for consent in the form of an AHIP*'. This current report has been prepared in accordance with the Due Diligence Code of Practice.

2.2.1. Due Diligence Assessment Process

The Due Diligence Assessment process (Figure 2.1) is a step-by-step process that provides proponents with a reasonable method to follow to determine whether their proposed activity has the potential to harm Aboriginal objects, and to identify reasonable constraints and opportunities of the activity, relating to Aboriginal heritage in the activity location. The primary steps of the Due Diligence process are:

- **Step 1** – Determine whether the activity will disturb the ground surface or any cultural modified trees.
- **Step 2a** – Database Search of the OEH Aboriginal Heritage Information Management Services (AHIMS), and other known sources to determine whether any registered sites are located within/near the study area.
- **Step 2b** – Environmental and Landscape Assessment.
- **Step 3** – Impact Avoidance Assessment.
- **Step 4** – Desktop Assessment and Visual Inspection.

Following this process, should the assessment determine that Aboriginal objects are likely to be present and have potential to be impacted, the Due Diligence Code of Practice advises further investigation and impact assessment (Step 5). Should the assessment determine that Aboriginal objects are unlikely to be present/unlikely to be harmed through the proposed activity, then the activity may proceed with caution.

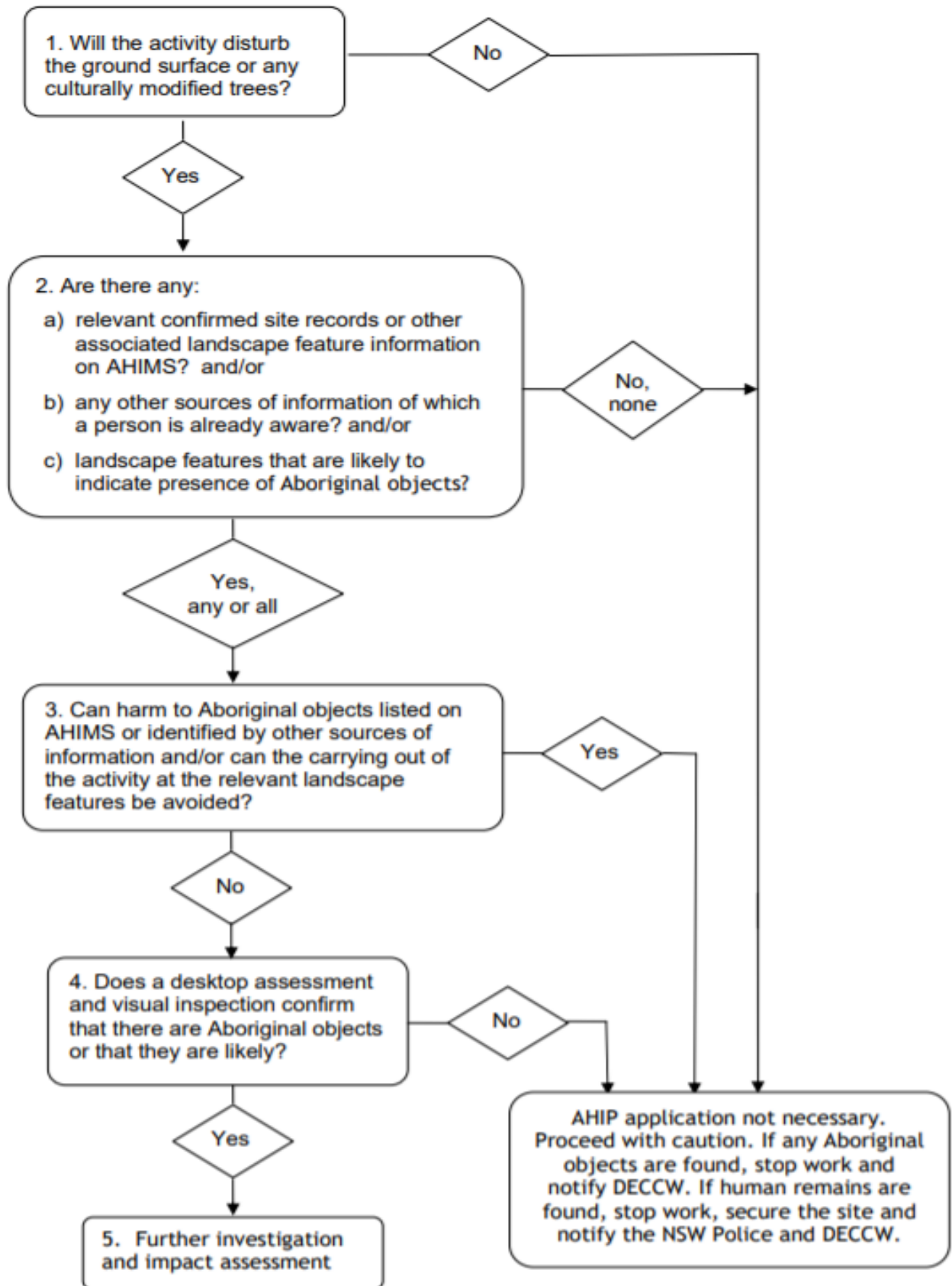


Figure 2.1: Outline of the Due Diligence process. Source: OEH 2010a

2.3. Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) is the primary land use statute in NSW. The Act requires that environmental and heritage (including Aboriginal heritage) impacts are considered by consent authorities prior to granting development approvals.

Local governments are also required under the EP&A Act to prepare planning instruments such as LEPs in accordance with the principles of the legislation to provide guidance on the level of environmental assessment required. Local heritage items, including known archaeological items, identified Aboriginal Places and heritage conservation areas are protected through listings on LEPs and State Environmental Planning Policies (SEPPs). The EP&A Act also requires that potential Aboriginal and historical archaeological resources be adequately assessed and considered as part of the development process, in accordance with the requirements of the Heritage Act.

Part 4 of the EP&A Act relates to the process of obtaining development consent from local government authorities, including the requirement for documentation of an assessment of potential development impacts in certain cases. It also describes the process for integrated development (Division 4.8) which covers those development proposals requiring an AHIP under s90 of the NPW Act. Under the EP&A Act, Councils can be determining authorities in relation to their own works and often do not require the same assessment rigour as other proponents (although under the NPW Act with its strict liability provisions, Councils are still required to exercise Due Diligence and require AHIP approvals for harm to Aboriginal objects).

When a project is assessed to be SSD, the process of development approval differs with certain approvals and legislation no longer applicable to the project. Of relevance to the assessment of Aboriginal heritage for a development, the requirement for an Aboriginal Heritage Impact Permit (AHIP) in accordance with Section 90 of the National Parks and Wildlife Act 1974 (NPW Act) is removed for SSD projects (EP&A Act Section 89J).

The project does meet the criteria for SSDA and therefore is not subject to the provisions of the NPW Act.

2.3.1. Sydney Local Environmental Plan (LEP) 2012

The Sydney LEP 2012 provides local environmental planning provisions for land within the City of Sydney LGA. Section 5.10.1 of the LEP outlines the objectives and controls for heritage conservation including the conservation of Aboriginal objects, Aboriginal places of heritage significance, built heritage and archaeological sites.

- a) *to conserve the environmental heritage of the City of Sydney,*
- b) *to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,*
- c) *to conserve archaeological sites,*
- d) ***to conserve Aboriginal objects and Aboriginal places of heritage significance.***

Section 5.10.8 requires that the consent authority must, before granting consent under this clause to the carrying out of development in an Aboriginal place of heritage significance:

- a) *consider the effect of the proposed development on the heritage significance of the place and any Aboriginal object known or reasonably likely to be located at the place by means of an adequate investigation and assessment (which may involve consideration of a heritage impact statement).*

- b) *notify the local Aboriginal communities, in writing or in such other manner as may be appropriate, about the application and take into consideration any response received within 28 days after the notice is sent.*

2.3.2. Sydney Development Control Plan (DCP) 2012

The Sydney DCP 2012 is a non-statutory development control plan that provides the detailed design guidelines to support the Sydney LEP 2012. The DCP provides guidance on how development may occur and includes primary objectives to ensure that items of environmental heritage are conserved, respected, and protected. The DCP does not strictly apply to development submitted under an SSD, however the following controls are highlighted for their relevance.

Chapter 3.9.3 defines the controls and objectives for Archaeological assessments:

- (1) An archaeological assessment is to be prepared by a suitably qualified archaeologist in accordance with the guidelines prepared by the NSW Office and Environment and Heritage.*
- (2) For development proposals in Central Sydney, refer to the Central Sydney Archaeological Zoning Plan to determine whether the development site has archaeological potential.*
- (3) An archaeological assessment is to be submitted as part of the Statement of Environmental Effects for development applications affecting an archaeological site or a place of Aboriginal heritage significance, or potential archaeological site that is likely to have heritage significance.*
- (4) An archaeological assessment is to include:*
 - (a) an assessment of the archaeological potential of the archaeological site **or place of Aboriginal heritage significance**;*
 - (b) the heritage significance of the archaeological site or **place of Aboriginal heritage significance**;*
 - (c) the probable impact of the proposed development on the heritage significance of the archaeological site or **place of Aboriginal heritage significance**;*
 - (d) the compatibility of the development with conservation policies contained within an applicable conservation management plan or conservation management strategy; and*
 - (e) a management strategy to conserve the heritage significance of the archaeological site or **place of Aboriginal heritage significance**.*
- (5) If there is any likelihood that the development will have an impact on significant archaeological relics, development is to ensure that the impact is managed according to the assessed level of significance of those relics.*

3. Historical Summary

3. Historical Summary

3.1. Aboriginal Sydney

It should be noted that much of the written historical evidence and early paintings or images of traditional Aboriginal lifestyle and economy is from historical records and documents written by early European settlers rather than Aboriginal people, meaning that it comes with an inherent non-Aboriginal bias and may not accurately represent an Aboriginal perspective of pre-Colonial Aboriginal ways of life and/or the impacts of colonisation on Aboriginal people. European colonisation resulted in catastrophic outcomes for Aboriginal communities, such as massacres, disease outbreaks, displacement and rapid changes in access to resources and land across NSW and beyond. Nevertheless, Aboriginal connection to country and culture endures throughout the generations and history is slowly being rewritten to provide a fuller understanding of Australia and the impacts of colonisation.



Figure 3.1: Aborigines at Night, Sydney' 1790, Painting by Edward Dawges. Source: Neighbourhood Media, Welcome to Gadigal Land.

Prior to the arrival of Europeans in Sydney Cove, the current study area would have formed part of the hunting and gathering grounds of the Eora. The term 'Eora' has frequently been used to refer collectively to the Aboriginal groups occupying the central and eastern Sydney regions, however, the true meaning and history of the term is unclear. It has been suggested, for instance, that the term 'Eora' was used by colonists as a word for 'people' and that there is no evidence in ethnographic

accounts for the word ever having been used in the context of describing particular tribes, groups or places.¹

Much of the evidence of traditional Aboriginal lifestyle and economy was disrupted in the early years of European settlement and understandings of the local Aboriginal groups in the Sydney region are based on ethnohistorical sources and/or information obtained from the archaeological record.

As hunter-gatherers, the local Aboriginal communities living in the area would have pursued a mixed food economy, utilising and relying upon readily available and abundant natural resources.

At the time of the arrival of the First Fleet in January 1788, it is estimated that at least 1,500 Aboriginal people may have lived along the coastal region between Broken Bay and Botany Bay. The arrival of the First Fleet devastated the lives and activities of Aboriginal people in the Sydney area, restricting access to areas traditionally used for hunting and gathering, shelter, and for ceremonial purposes, while also introducing devastating diseases such as smallpox. It is estimated that almost half of Sydney's Aboriginal population died in the first smallpox epidemic recorded in the colony in 1789.²

3.2. Post Contact History

The Aboriginal survivors of the initial smallpox epidemic took shelter in the Waterloo wetlands and it wasn't until the 1820s that the industrialists utilised the Waterloo area first for flour processing. By the 1850s the suburb of Waterloo was transformed into a commercial precinct with industries such as woolwashing and spinning, tanneries, dairies, fellmongers, brickworks, soapworks, rope making and candlemaking.³

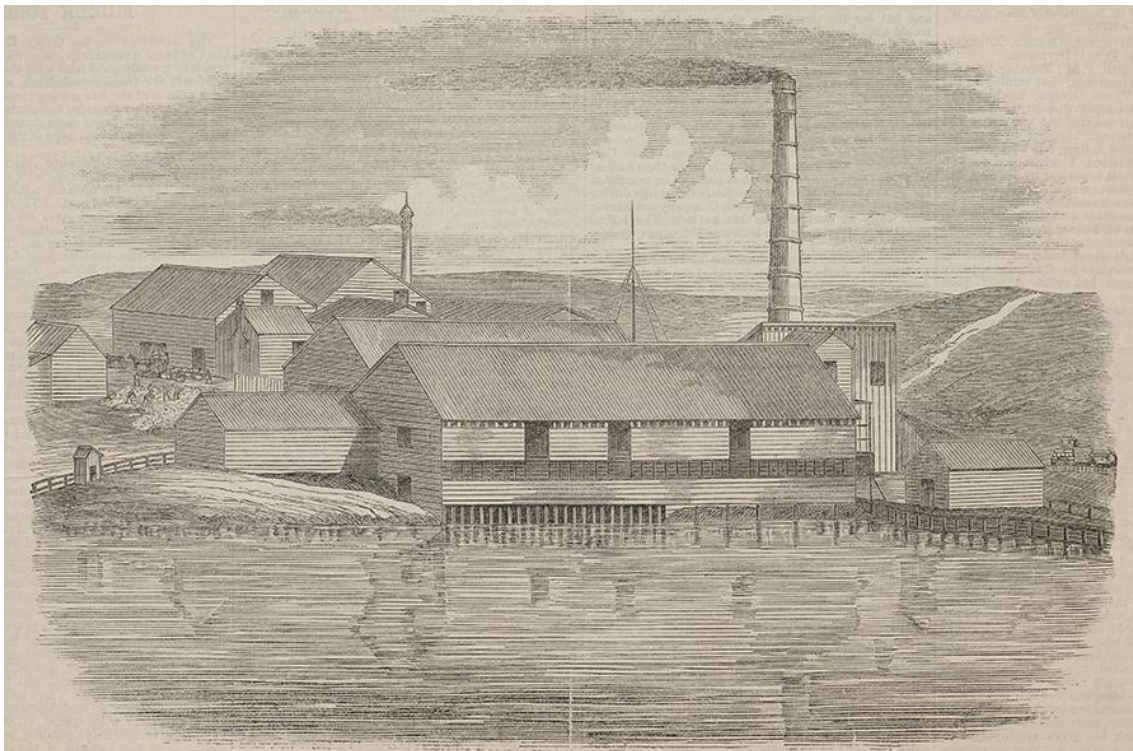


Figure 3.2: Waterloo Mills Wool washing Establishments on the Upper Dam. Source: State Library of NSW [TN83].

¹ Attenbrow 2010, p. 27

² Hinkson 2010

³ Waterloo Stories 2017 Cinetel Productions Pty Ltd

a Statement of Heritage Impact prepared for 903-921 Bourke Street, Waterloo by Graham Brooks & Associates in October 2015 provides a brief historical description of Waterloo, sourced from The Pictorial History of South Sydney.

The plentiful supply of water in the Waterloo area attracted its first industry, a water mill for grinding wheat into flour which was erected in 1820. When Governor Macquarie visited the mill the Sydney Gazette reported: So highly was his Excellency gratified by the performance of the undertaking that he bestowed upon it the name of Waterloo Mills. The great Battle of Waterloo, in which Wellington defeated Napoleon, had been fought five years earlier. The first land grant in the area was to John Thomas Campbell, Macquarie's secretary in 1825. He named it Mount Lachlan Estate in honour of the governor but sold the 185 acres four years later to Daniel Cooper and William Hutchinson. The land then became tied up in the Cooper Estate until World War I, although development took place on leasehold land before then. By the 1850s Waterloo was an industrial suburb with factories such as Alderson's Woolwash, Forsythe's Rope Works and a number of local dairies. The suburb was bounded on the east by sand hills and scrub which later became Moore Park. Waterloo became a borough in 1860, and the first Council meeting was held at the residence of Mr William Brown on the corner of Botany Road and Buckland Street. Later meetings were held in a room attached to Quin's bakery, the site of the present Cauliflower Hotel on the corner of Botany Road and Wellington Street. Waterloo rapidly progressed as an industrial area. In 1910 there were only about a dozen industries within the municipality, but by 1914, there were over a hundred.'

3.3. Historical Development of the Study Area

The study area was located with the bounds of the land granted to J T Campbell in 1825, who named it Mount Lachlan Estate. Only 4 years after the land was granted to J T Campbell, it was sold to Daniel Cooper and William Hutchinson in 1829, and became known as the Cooper Estate.

Prior to 1850 the study area was largely undeveloped, however, after this time there is records of industrial activity including, woolwashing, tanneries and fellmongering, dairy farming and market gardens.⁴ The Cooper Estate remained until after World War I, and throughout this time Waterloo became a bustling hub of over one hundred industries. According to the Sands Directory, from 1879 (and possibly earlier) Aldersons and Sons are a mainstay within the study area with a series of industrial occupations including woolwashers, tanners & curriers and fellmongering. The dam that lays adjacent to the study area, west of Young Street, is known as Aldersons Dam and the road that is now known as Danks Street was dot marked on a map (1886-1888) (Figure 3.4) as Aldersons Street.

In the wider region, the Waterloo Swamp was drained and reclaimed in 1908, and Victoria Park Racecourse was developed. By the early 1900s Waterloo was a major industrial and manufacturing district where Akubra Hats were made.⁵

Extract from the Danks Street South Statement of Heritage Impact, prepared by Matt Devine 2017:

⁴ Sands Directory, City of Sydney Archives.

⁵ City of Sydney, 2019, The Many Eras of Dyuralla Square. <https://news.cityofsydney.nsw.gov.au/articles/the-many-eras-of-dyuralla-square>

Parts of the former Campbell grant were sold and subdivided for housing in 1879, partly to provide accommodation for workers associated with the adjacent industries. Much of the terrace housing in the area dates from this period. By 1943, the DSS Precinct was almost entirely developed with industrial buildings. During the mid-20th century, large parcels of land were cleared for the provision of social housing, in a range of forms, including towers. From the late 20th century, Waterloo began evolving, especially in the eastern areas, changing from an area of industry to one with increasing amounts of medium to high-density residential development with some commercial development as well.

A review of historical images covering the local area allows for an understanding of the general phases of development specific for the current study area. A review of historical aerial photos is provided in Table 3.1.



Figure 3.3: Plan of the 'Waterloo Estate', grants from the crown, shewing also its neighbouring locations, 1820-1840. Showing JT Campbell estate of 185 Acres before it was subdivided. Approximate location of Study area indicated in red. Source: State Library of NSW. 74VK2QzPLwzy.

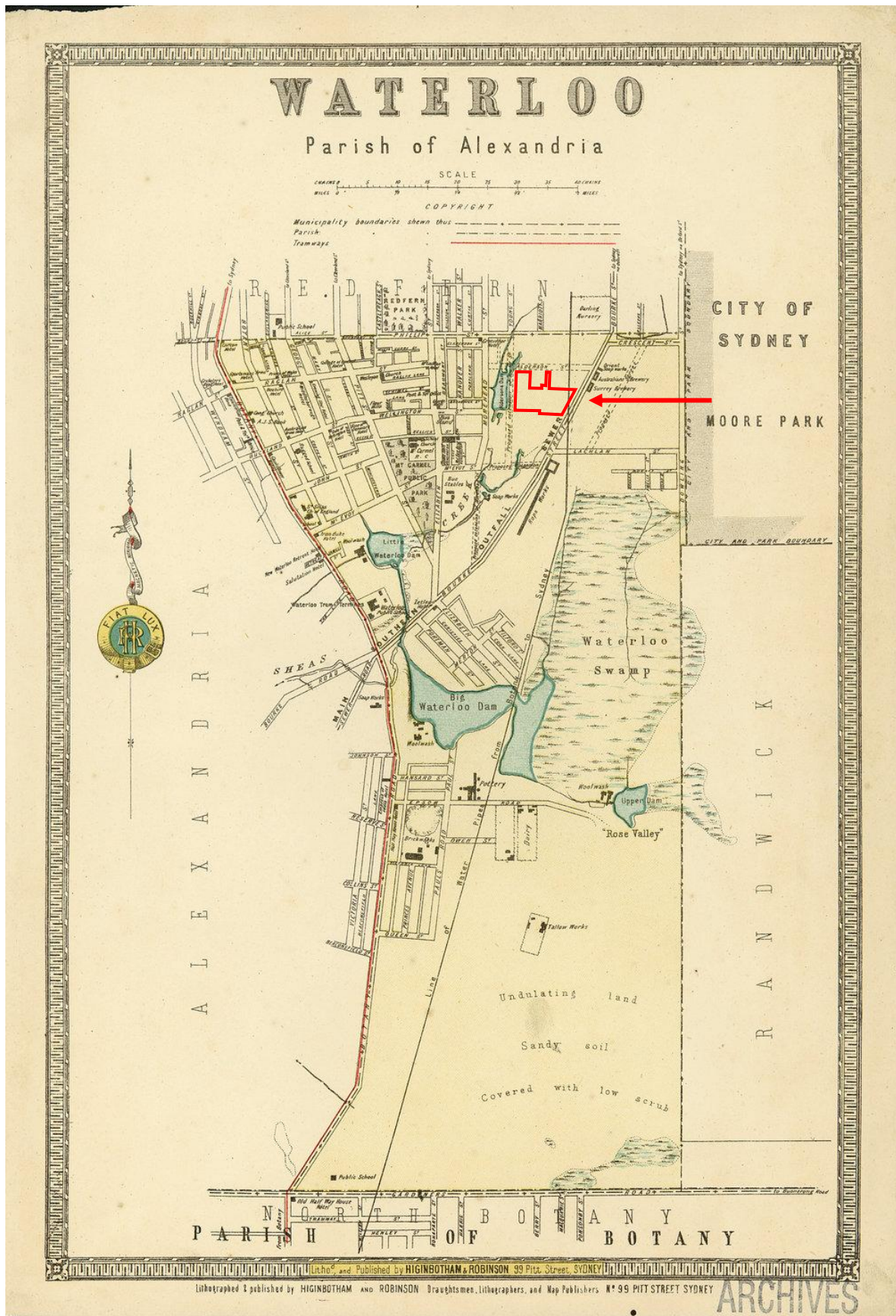


Figure 3.4: Atlas of the suburbs of Sydney – Waterloo 1886-1888. Study area indicated in red. Source: Higinbotham & Robinson. City of Sydney Archives.

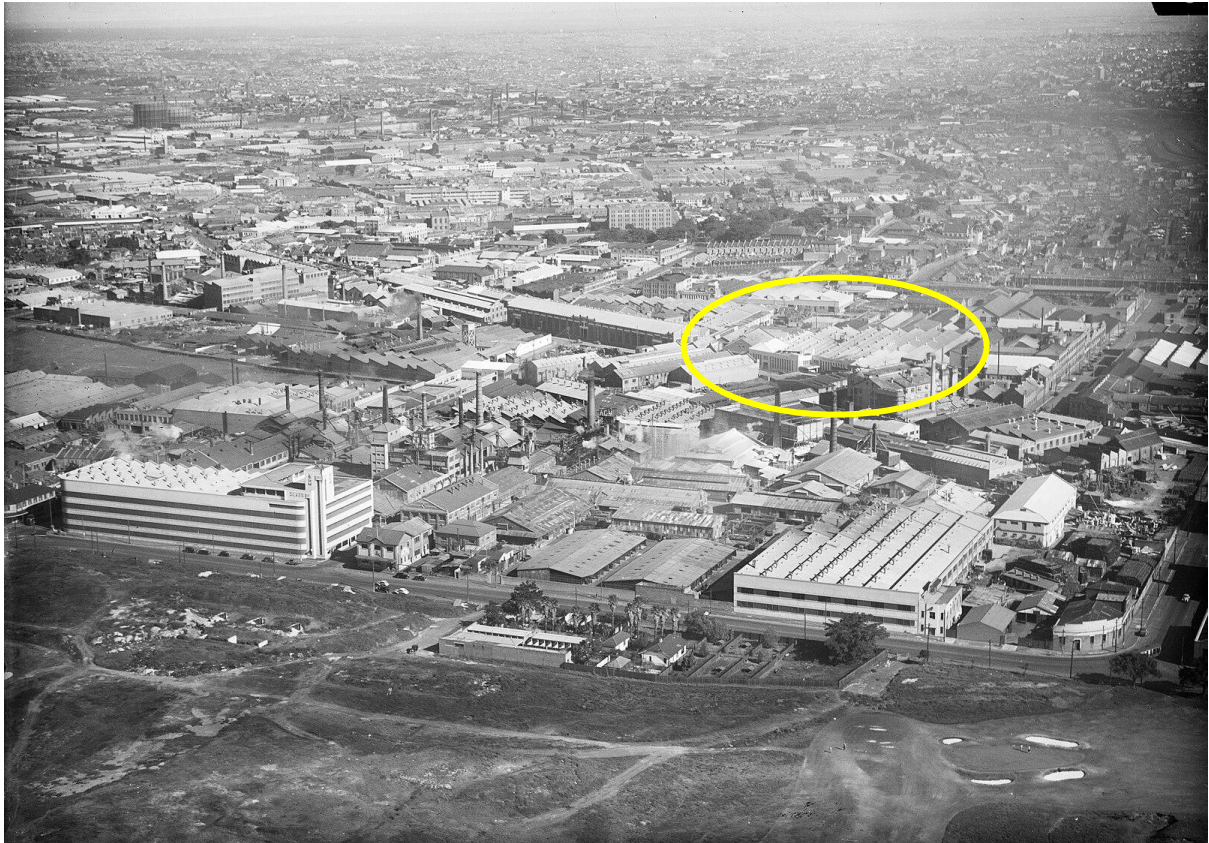


Figure 3.5: Waterloo and the Australian Glass Manufacturers works, from South Downing Street, 1948-1952. Approximate location of study area is circled in yellow. Source: State Library of New South Wales, ON 447/Box 175.

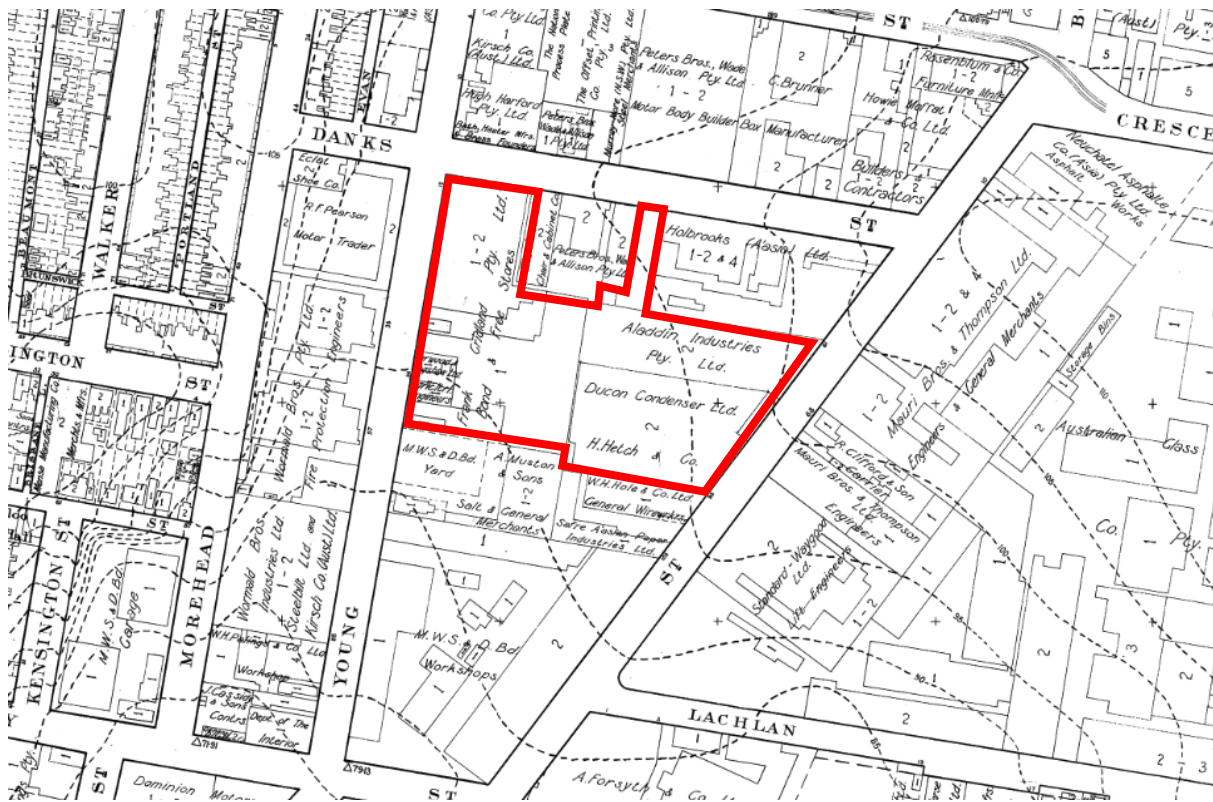
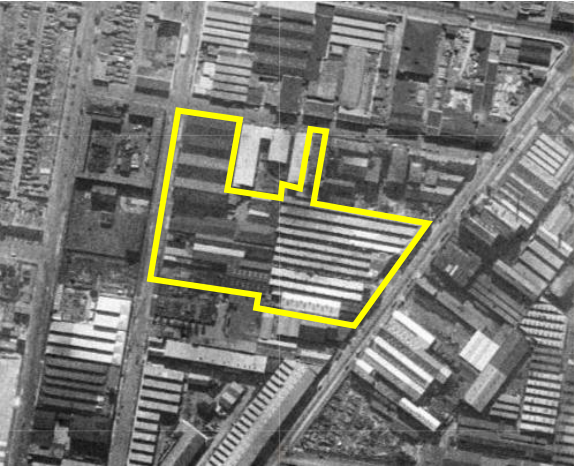


Figure 3.6: City of Sydney – Civic Survey, 1938-1950. Map 24 – Zetland. Source: City of Sydney Archives & History resources.

Table 3.1: Historical development of study area based on review of historical imagery. Study area outlined in yellow. Source: NSW Historical Imagery Viewer.

Date	Image	Description
1943		• Area is completely cleared of natural vegetation. • Main road network including Bourke, Danks and Young streets and subdivision layout is well-established. • The study area is extensively developed with warehousing across the entire study area.
1971		• There is very little change to the study area from 1943. • There is more warehousing development to the west of the study area.
1982		• There is very little change to the study area from 1971.

Date	Image	Description
1991		• There is very little change to the study area from 1982. The shape of the roof on the building to the northwest has been altered in shape. • The carpark to the southwest looks to be left to grass over. • There are a few trees along Danks Street. • A carpark is visible on the western portion of the study area.
1998		• The study area remains largely unchanged from the 1991 ariel image. • The carpark to the southwest looks to have more vegetation • The greater area shows signs of redevelopment and the removal of buildings to the south of the study area. • The vegetation has increased in the wider area.
2005		• There is very little change to the study area from the 1998 ariel image. • The greater area has been redeveloped. • There is more vegetation in the greater area and along Young, Danks and Bourke Streets.

3.4. Summary of Historical Development

A review of historical resources, ariels and maps demonstrates that the study area formed part of the JT Campbell land grant of 185 acres in 1825 which was purchased by Daniel Cooper and William Hutchinson in 1829. After 1879, the Sands Directory shows a variety of industry operating within the study area including ropeworks, dairies, market gardens, woolwashers, tanneries, curriers and fellmongeries. The study area has been subject to a variety industrial use that would have impacted and disturbed the upper layers of the soil profile.

The aerial imagery, since 1943, shows the site to be covered in warehousing with no native vegetation present. It is likely that the warehousing was present within the study area from 1938, evident in the Civic Survey (Figure 3.6). There has been very little change to the study area until the

1990s when the building in the northwest portion of the study area was altered, obvious from the lines of the roof. Since that alteration the ariel imagery shows little to no change to the study area.

Based on the understanding of the historical development of the site, the following phases of occupation and land use can be determined:

- Phase 1: pre-1788 – Aboriginal occupation and land use
- Phase 2: 1788 -1829 – vacant land granted to JT Campbell (named Lachlan Estate) in 1825 and sold in 1829 to Daniel Cooper and William Hutchinson.
- Phase 3: 1829 -1930s – the Cooper Estate saw the initial industrialisation of the area. The industry including, wool washing, tanneries, soap works, dairies and market gardens.
- Phase 4: 1930s - present – The land is completely cleared, and Industrial and commercial warehousing and buildings occupy majority of the site. All buildings were demolished on site in 2025.

4. Aboriginal Objects Due Diligence Assessment

4. Aboriginal Objects Due Diligence Assessment

4.1. Is the proposed activity a low impact activity as defined by the Regulation?

No.

The proposed activity is not defined as low impact, due to the ground disturbance associated with demolition works and accompanying land clearance for construction of the proposed development.

4.2. Step 1: Will the proposed activity disturb the ground surface or any culturally modified trees?

Yes and No.

The previous structures within the study area have been demolished. The groundworks associated with the early works SSDA for the new development of apartment complexes will disturb the ground. It is proposed that bulk excavation works and associated ancillary site preparation will form the early works. The majority of the proposed works that will come under the Main SSDA will be additionally associated with the addition of several multi-level apartment blocks to the study area.

The study area has been completely cleared of natural vegetation since the mid nineteenth century and has been subject to extensive urban development from the early twentieth century. No culturally modified trees would be present on the site and therefore will not be impacted by the proposed works.

4.2.1. Proposed Works

The proposed development at Bourke and Young Streets, Waterloo comprises a staged mixed-use precinct across four parcels, delivering a variety of residential buildings ranging from low-rise forms to towers up to 35 storeys. The scheme will provide a mix of studios, one-, two- and three-bedroom apartments, including affordable housing, supported by active ground floor uses such as retail, co-working, wellness and community spaces.

The urban design integrates landscaped communal areas, deep soil planting, activation of a new internal road running east-west and linking Young and Bourke Street, new pedestrian links from Dank Street and existing street frontages to Bourke Street and Young Streets to enhance permeability through the site and connect with the public domain, as well as the creation of basement levels to accommodate parking, services and ancillary services and infrastructure.

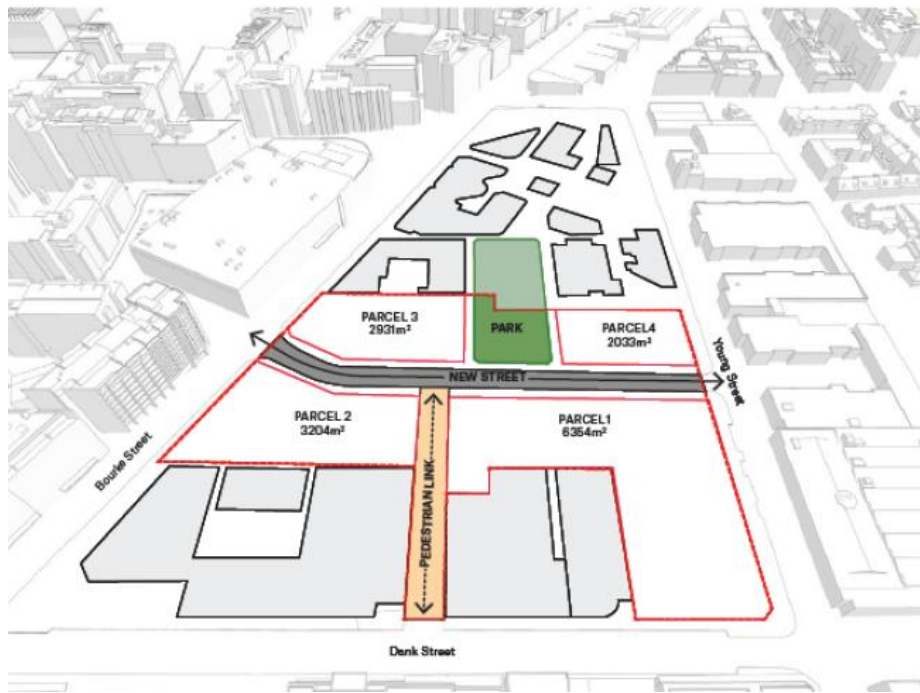


Figure 4.1: Precinct Strategy plan (looking south) showing location of parcels 1-4 and dedicated areas for public domain.
Source: Bates Smart, SJB, Chenchow Little and Curious Practice HDA Design Report, August 2025, pg.24

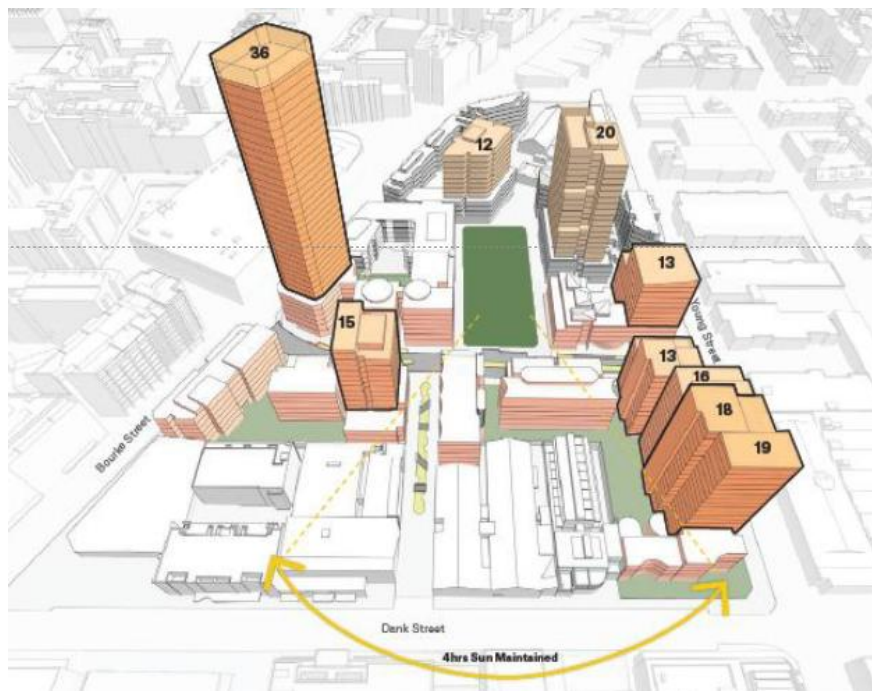


Figure 4.2: Precinct Strategy plan (looking south) proposed building heights and massing and showing concentration of higher built forms to the south-eastern and north-western corners of the study area. Source: Bates Smart, SJB, Chenchow Little and Curious Practice HDA Design Report, August 2025, pg.24

Parcel 1

Parcel 1 comprises a mixed-use residential building addressing Danks Street, New Street and Young Street, with access via an internal pedestrian link. The built form includes a five-storey podium with a tower element stepping up to 19 storeys at the north-western corner (Danks and Young Streets) and

reducing to 13 storeys at the south-western corner. Two basement levels provide car parking, plant, waste and services. The ground floor contains retail, a gym, co-working areas and residential lobbies, creating active frontages to surrounding streets. Upper levels accommodate a mix of apartment types. Communal facilities, including private dining, wellness areas, recreation rooms and landscaped podium levels, are provided for residents. Landscaped setbacks to the west and north retain the setting of existing street trees.

Parcel 2

Parcel 2 is located in the north-eastern portion of the site and contains two residential buildings positioned around landscaped communal areas and pedestrian links. Building 2A is a 7-storey mid-rise addressing Bourke Street, accommodating affordable housing and activating the street frontage. Building 2B is a 15-storey residential tower, centrally located and set back from the street. Ground floor areas provide retail tenancies, residential lobbies and communal spaces, with upper levels containing a mix of one-, two- and three-bedroom apartments designed to maximise light and ventilation. The parcel incorporates deep soil planting, podium-level communal spaces and through-site links to improve permeability.

Parcel 3

Parcel 3 occupies the south-eastern portion of the site and contains the tallest buildings within the redevelopment. Building 3A is a 35-storey residential tower (to RL 152.65 m) forming a key landmark along Bourke Street, with a roof terrace and setbacks at upper levels to reduce visual bulk. Building 3B is an 8-storey building (to RL 57.8 m) adjoining the proposed public park, stepping down to create a transition in scale to the open space. Ground floors accommodate retail premises, residential lobbies and communal facilities, with podium levels providing gyms, private dining rooms, recreation areas and landscaped terraces. Apartments include build-to-rent and affordable housing options as well as a mix of one-, two- and three-bedroom dwellings.

Parcel 4

Parcel 4 is located at the corner of Young and Bourke Streets and comprises an 11-storey mixed-use residential building over two basement levels that accommodate car parking, plant, waste and services. The ground and mezzanine levels include lobbies, artist studios, retail tenancies and communal spaces, providing active frontages to both street frontages. Levels 1 to 11 contain a mix of one-, two- and three-bedroom apartments, with some compact studios included to broaden housing diversity. Resident amenity is provided through podium-level communal areas with landscaped terraces and a bathhouse, as well as additional communal rooms and terraces on upper levels.

Landscaping and Public Domain

The proposal includes the incorporation of the northern portion of the central park element, centrally situated between Parcels 3 and 4. Landscaping and public domain enhancements will also include a pedestrian orientated ground plane with new pedestrian access from Danks Street (to the north), Bourke Street to the east, and Young Street to the west. Communal gardens and public plazas will also be included. Deep soil areas are contained within each of the four precincts, retail courtyards provide amenity and activation to the corner of Danks and Young Streets and to the new precinct entrance via Bourke Street. Communal garden and residents walk will also permeate the northern portion of the study area and provision of garden room residences at ground floor levels will activate the ground plane.

Full details are provided within the Landscape Report prepared by Turf and submitted with this SSDA.

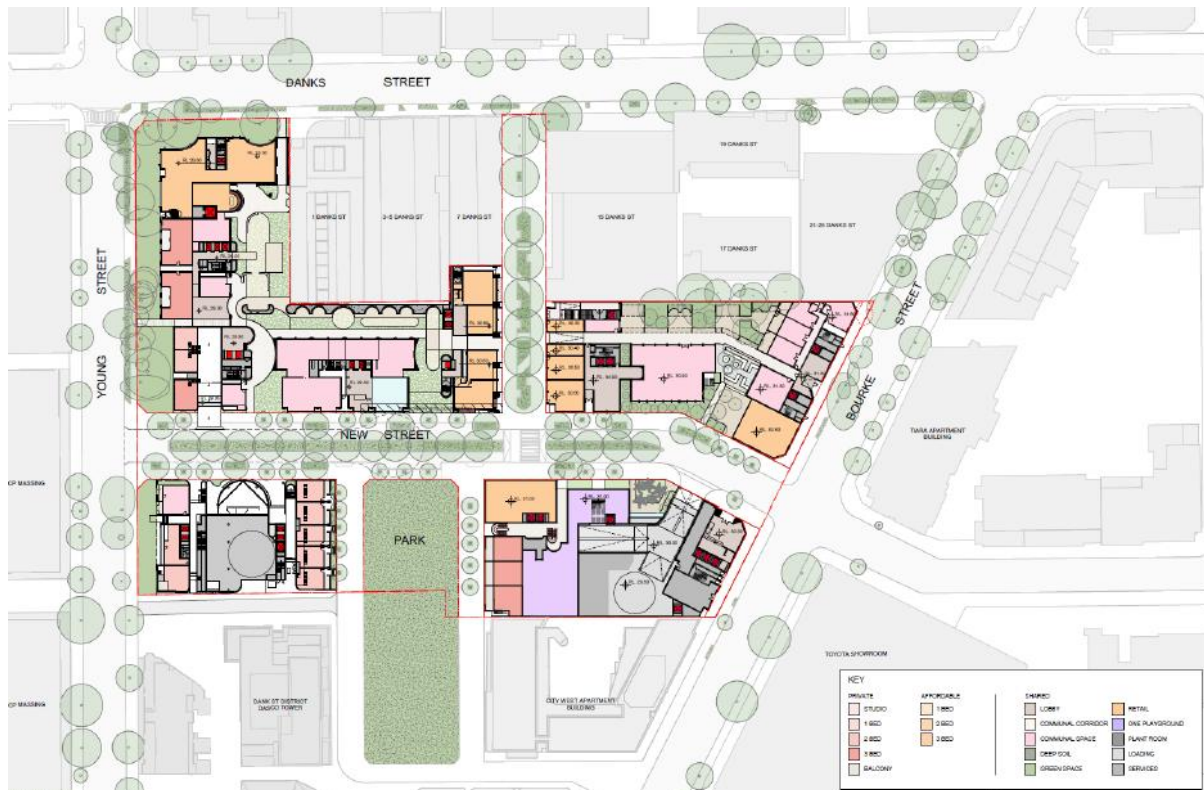


Figure 4.3: Precinct Plan. Source: SJB Architects, Curious Practice, Bates Smart & Chenchow Little 2025



Figure 4.4: Parcel 1 ground floor plan. Source: SJB Architects 2025



Figure 4.5: Parcel 1 elevations. Source: SJB Architects, Curious Practice & Dangar Barin Smith 2025

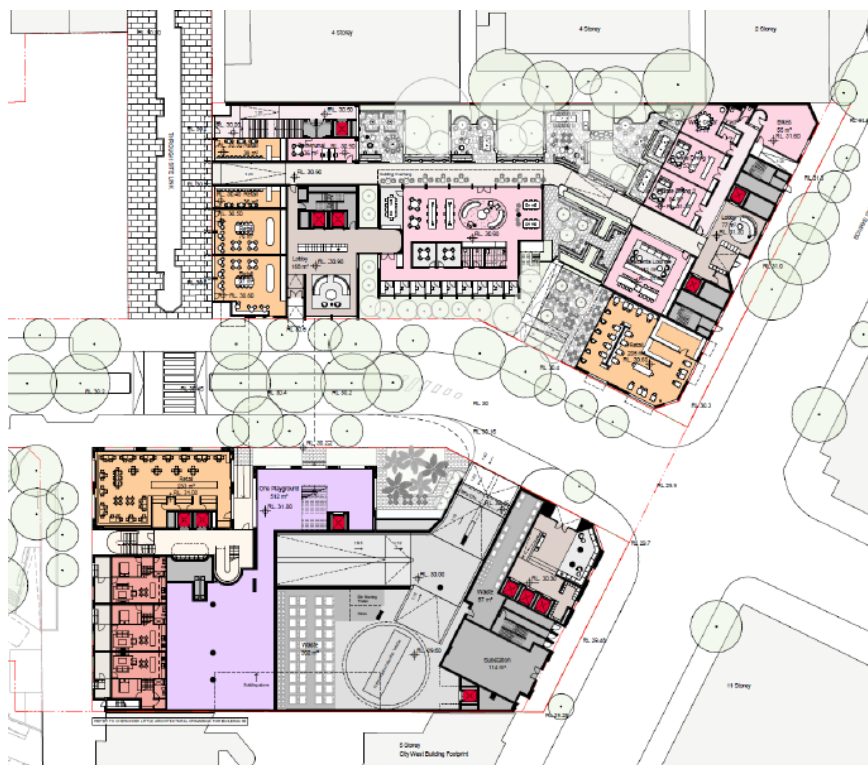


Figure 4.6: Parcels 2 and 3 ground floor plan. Source: Bates Smart & Chenchow Little 2025



Figure 4.7: Renders for Parcels 2 and 3, as well as aerial from Danks Street. Source: Bates Smart & Chenchow Little 2025

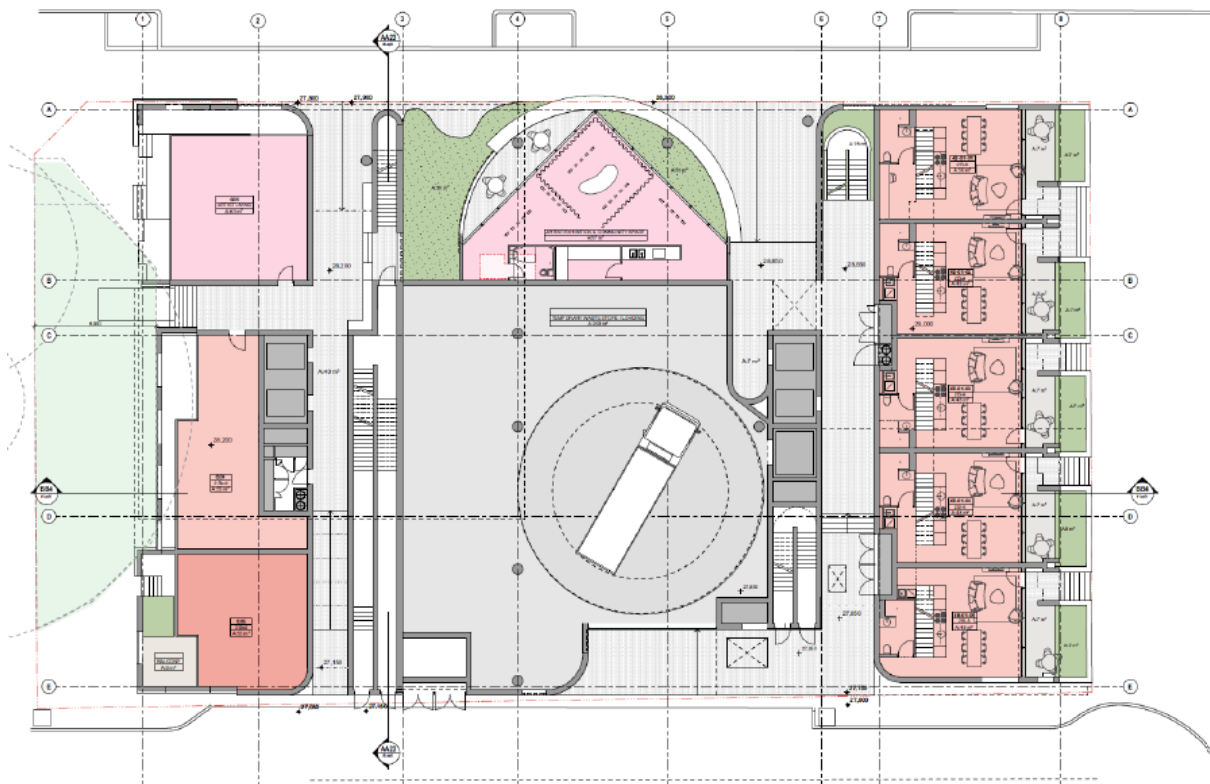


Figure 4.8: Parcel 4 ground floor plan. Source: Curious Practice 2025



Figure 4.9: Parcel 4 elevations. Source: Curious Practice 2025

4.3. Step 2a: Database Search

4.3.1. AHIMS Search

An extensive search of the Aboriginal Heritage Information Management System (AHIMS) database was undertaken on 6 May 2025 centred on the study area Lot 1 & 2 DP 1308636. A total of 6 registered Aboriginal heritage sites are listed as being located within the wider area of the study area, though none are located directly within or adjacent to the current study area. The extensive AHIMS search is attached as Appendix A.

AHIMS search results always require a certain amount of scrutiny in order to acknowledge and accommodate for things such as inconsistencies in the coordinates (differing datums between years of recording), the existence of, and impact to, registered sites (impact to a registered site technically requires the submission of a Heritage Impact Recording form to be submitted to Heritage NSW, however these forms are not always submitted), and other database related difficulties. It should also be noted that the AHIMS database is a record of archaeological work that has been undertaken and registered with Heritage NSW in the region. The AHIMS database is therefore a reflection of

recorded archaeological work, the need for which has likely been predominately triggered by development, and not a representation of the actual archaeological potential of the search area. AHIMS searches should be used as a starting point for further research and not as a definitive, final set of data.

Summary descriptions of Aboriginal site features registered on AHIMS, as relevant to the study area and surrounding local region, are presented in Table 4.1. The 6 registered sites from the AHIMS search are comprised of three different site types, as summarised in Table 4.2. The general distribution of each of these registered sites in relation to the study area is depicted in Figure 4.10.

The closest registered site to the study is registered as a Potential Archaeological Deposit and has been reclassified as Not a Site (AHIMS ID# 45-6-3899) situated approximately 320m to the southwest of the study area. The limited nature recorded sites within the area also indicates that assessment and investigations of Aboriginal cultural heritage has been limited.

Table 4.1: Aboriginal Site Features

Site Feature	Description
Potential Archaeological Deposit (PAD)	An area where Aboriginal cultural material such as stone artefacts, hearths, middens etc. may be present in a subsurface capacity.
Shell	An area commonly made up of the remains of edible shellfish and could be the result of a single meal or many meals at the same location over many years. A midden may also contain fish and animal bones, stone tools, or charcoal. They can vary in size and depth. Middens are sometimes associated with burials.
Artefact	A common type of Aboriginal object, and include stone tools, spear points, surface scatters, grinding stones, ground-edge axes and other implements that were used for a variety of purposes, such as in the preparation of food or to make nets, baskets and other tools. Stone artefacts often have sharp edges or are of a stone type that is different from the natural rock in the area.

Table 4.2: AHIMS Sites within 1km of the study area.

Site Type *	Number of Sites	Percentage of Sites (%)
Potential Archaeological Deposit (PAD)	2	33.33....
Shell and Artefact	1	16.66...
Artefact	3	50
Total	6	100

*Please note – while these sites make up the data provided by AHIMS, Sites #45-6-2597 (Shell, Artefact) and #45-6-3899 (PAD), have been classified as Not a Site. Site #45-6-3704 is classified as destroyed and site #45-6-4050 is classified as partially destroyed.

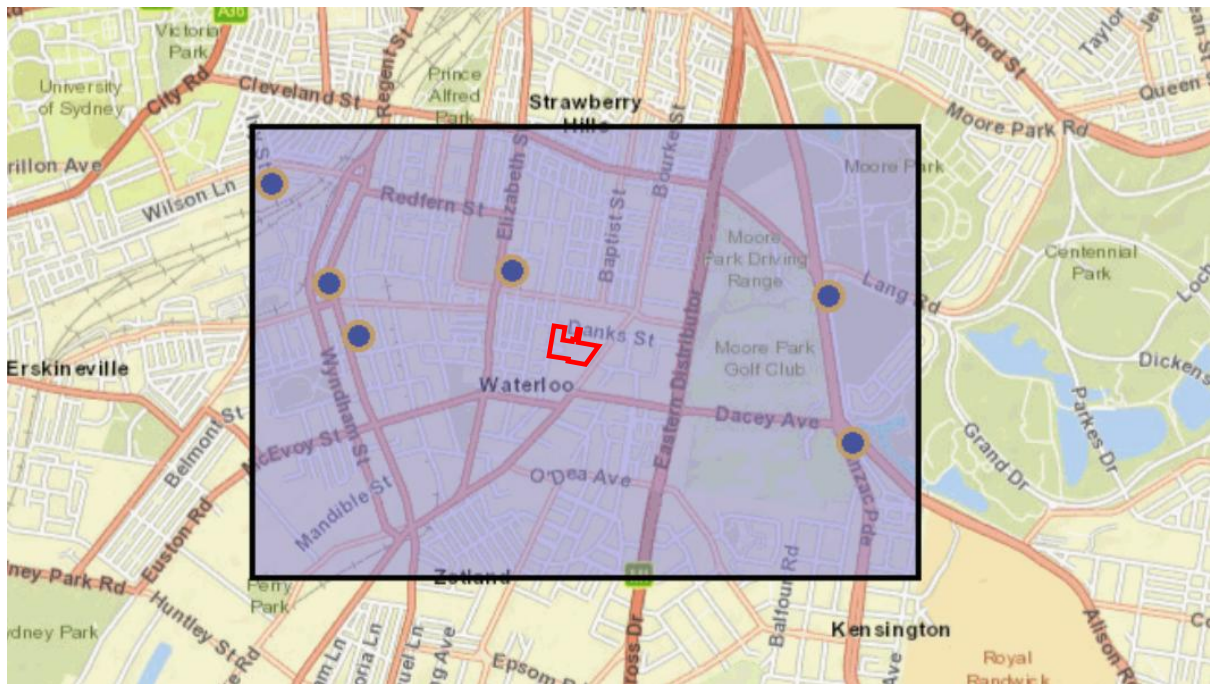


Figure 4.10: AHIMS Sites within the wider area of the study area. Study area indicated by the red circle, AHIMS sites indicated by yellow circle. Source: AHIMS.

4.3.2. Other Heritage Registers

Searches of the Australian World Heritage Database, the Commonwealth Heritage List, National Heritage List, State Heritage Register, State Heritage Inventory, the Sydney LEP (2012), and the Sydney DCP (2012) were conducted on the 6 May 2025. Clause 5.10 of the Sydney LEP (2012) outlines the controls for Heritage conservation including the conservation of Aboriginal objects and Aboriginal places of heritage significance.

The searches concluded that there are no Aboriginal heritage items within, or directly adjacent to, the study area.

4.4. Review of Previous Assessments

Review of previous archaeological work in the surrounding area is a highly informative and a necessary step in identifying the likely nature of the potential archaeology within an area. The investigation of previous work undertaken in the region, on similar locations, and on similar landscape or landforms, can inform our understanding of an area by providing a proxy against which a newly investigated area can be measured (albeit with caution). That is to say, understanding the archaeological record at a general location can provide us with an indication of the nature and level of potential of archaeology that may be present within an area, prior to any subsurface investigation. As archaeology is by its very nature, a destructive discipline, it is important to acquire as much information and understanding of an area as possible prior to undertaking fieldwork (as once evidence has been excavated, its context is effectively destroyed), and to avoid any unnecessary fieldwork at a site.

No known Aboriginal archaeological excavations have been undertaken previously within the study area. The following provides a brief review of a selection of past assessments undertaken in proximity to the study area.

Waterloo South Planning Proposal, Aboriginal Cultural Heritage Study (2020)⁶

In 2020 Urbis undertook an Aboriginal Cultural Heritage Study on Waterloo South which formed part of the Waterloo Estate. This report revealed five AHIMS sites within their search area. These sites consisted of Shell, Artefact, Potential Archaeological deposit and Aboriginal Resource and Gathering site. The report concluded that the southern portion of the study area within this report has low to moderate potential for Aboriginal Archaeological resources and the rest of the subject site has low to nil. The Waterloo Estate situated within what is known as Waterloo South is approximately 550m from the study area.

AHIMS Site #43-6-0751, Sheas Creek Dugong, Rickety Street Bridge, St Peters

During the construction of the Alexandra Canal in 1896 Dugong bones were discovered along with stone artefacts including stone hatchets. On further investigation the bones of the Dugong showed deliberate cut marks and provided the first archaeological evidence of long-standing Aboriginal occupation of this area. The bones are carbon dated to 5,500 BP. The site status on AHIMS is Destroyed.

AHIMS site #43-6-1496, Sheas Creek – Val Attenbrow (1984)⁷

An inspection was undertaken of potential Aboriginal midden site #45-6-1496 located at the St Peters Brickworks, Canal Road. During the inspection it was determined that the shell deposit found was not an Aboriginal midden. Its location was interpreted to be indicative of a former Botany Bay shoreline prior to its post c.6,000 BP present level. The assessment provided evidence for the existence of massive natural shell beds throughout the local area and note that prior to the construction of the Alexandria Canal and land reclamation, the local area was saltwater swamp. The site status on AHIMS is Not a Site.

Waterloo Estate (South) Addendum Aboriginal Cultural Heritage Study (2021)⁸

Artefact Heritage prepared an Aboriginal Cultural Heritage Assessment Report (ACHAR) in 2022 for the Waterloo Estate study area, situated adjacent to the Bourke Street study area.

The assessment found that no sites were registered within the study area and that the precinct has been subject to generally high levels of disturbance. The study area is situated within the Tuggerah soil profile, and it was noted that:

The evidence gathered from the geomorphological data and archaeological excavations carried out in Tuggerah Soils in the wider vicinity of the study area indicated that there exists only low archaeological potential where the archaeologically sensitive t1 upper soil unit has been removed or disturbed through development including road formation and housing.

... While the presence of sand dunes does not necessarily equate the presence of artefact bearing deposits, the proximity of the landform to swamp lands indicated that if the upper portion of intact Tuggerah Soil landscape survives, there is some potential for the presence of Aboriginal objects to be present. These are likely to be low density artefact deposits.⁹

⁶ Aboriginal Cultural Heritage Study, Waterloo Estate (South). 2020. Urbis

⁷ Attenbrow, V., 1984, *St Peters Brick Pit, Sydney NSW Investigation of Shell Material*. Unpublished report to Sydney City Council

⁸ Artefact Heritage, 2021, Waterloo Estate (South) Addendum Aboriginal Cultural Heritage Study, p24

⁹ Artefact Heritage, 2021, Waterloo Estate (South) Addendum Aboriginal Cultural Heritage Study, p24

This predictive model is relevant to the Young Street study area due to the landform and soil similarities of the two sites. The Artefact assessment found that where historic disturbance was minimal, the study area retained a low potential to contain subsurface Aboriginal objects.

Archaeological Assessment: Botany Road Corridor (2020)¹⁰

Urbis prepared a desktop Archaeological Assessment for the Botany Road Corridor.

The assessment found that:

- *The majority of the subject area is located on the Tuggerah Soil Landscape that is comprised by quaternary sand deposits and have high potential for comprising Aboriginal archaeological resources based on the results of previously carried out archaeological investigations within and in the wider surroundings of the subject area.*
- *The subject area has been impacted by various levels of historical land use since colonisation, especially by the growing urban development of the late nineteenth century and all through the twentieth century, that has transformed the original natural environment into a densely built urban environment. Localised impacts might have impacted Aboriginal archaeological resources to various levels.¹¹*

Urbis also found that the Botany Road alignment replicates an historic trackway following a dune crest from Botany Bay to Sydney.

4.5. Step 2b: Are there any landscape features that are likely to indicate the presence of Aboriginal objects?

The Due Diligence Code identifies certain landscape features that have the high potential for Aboriginal archaeological resources and cultural heritage. The following landscape features are identified as having high potential for Aboriginal objects:

- within 200m of waters, or
- located within a sand dune system, or
- located on a ridge top, ridge line or headland, or
- located within 200m below or above a cliff face, or
- within 20m of or in a cave, rock shelter, or a cave mouth.

The physical setting of the study area, its natural resources, landforms, and wider landscape setting has a significant influence over the nature, location, and form of Aboriginal occupation and use patterns through their interactions with the land (tangible values and site), while also providing meaningful landscape context for intangible heritage and connection to Country.

Due to the modified nature of the current study area with roads, footpaths and previous and existing dwellings, an assessment of archaeological potential must be made based on the environment as it would have been prior to European land-use practices.

The early maps indicate an extensive swamp system, known as the Waterloo Swamp along with dams and tributaries off Sheas Creek in proximity to the study area. The study area is located within the Tuggerah soil landscape which is defined by aeolian dune systems.

¹⁰ Urbis, 2020, p1

¹¹ Urbis, 2020, p1

4.5.1. Geology and Soil Landscapes

The area is located within the Tuggerah (tg) soil landform within the extensive Botany lowlands dune system, which stretches across Botany, Randwick and South Sydney (Figure 4.11 and Figure 4.12). These aeolian dunes are made up of Quaternary (Holocene and Pleistocene) wind-blown marine quartz fine grained sand.¹²

The Tuggerah soils (Figure 8.2) are made up of the following dominant soils:¹³

- **A1 horizon** - Loose speckled grey-brown loamy sand (**tg1**). Mix of small dark organic inclusions and charcoal fragments often present. It generally occurs as a topsoil (A-horizon).
- **A2 horizon** - Bleached loose sand (**tg2**). Charcoal and stones relatively absent and roots are rare.
- **B horizon**- soft black organic stained sand to loamy sand (**tg3**). Often occurs as a subsoil pan.
- **B horizon** – Dull yellow orange loose sand with single grained structure (**tg4**). Occurs either as deep subsoil or may be exposed at the surface and re-worked by wind.

The Tuggerah soil landscape has the potential to contain subsurface Aboriginal objects, burials and middens in the topsoil deposits (tg1 and upper tg2), typically in the top 1-2m of deposit. The deep basal aeolian deposits of tg2 and tg3 are considered unlikely to contain Aboriginal objects and may be several metres in depth.¹⁴

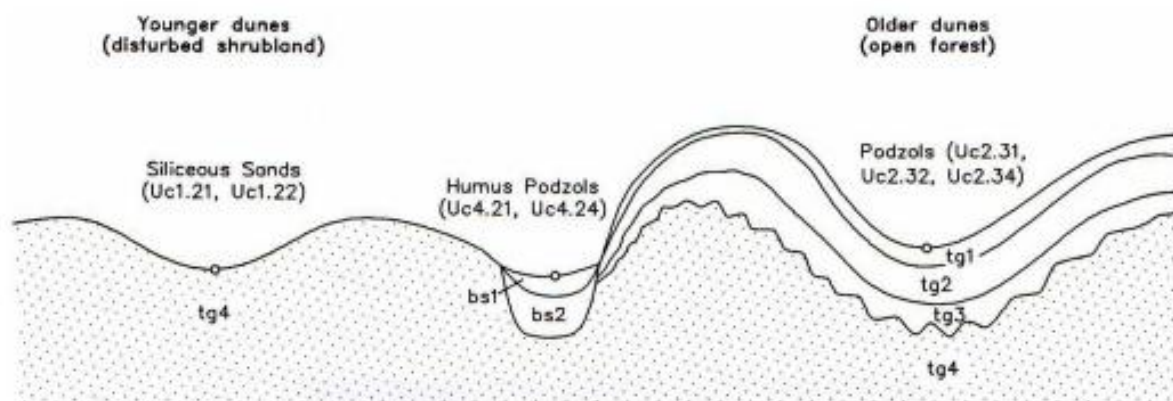


Figure 4.11: Schematic Cross section of the Tuggerah Soil Landscape. Source: eSpade

¹² ESpade, *Tuggerah Soil landform*. <https://www.environment.nsw.gov.au/Salis5app/resources/spade/reports/9130tg.pdf>

¹³ Chapman & Murphy, 1989. *Soil Landscapes of Sydney 1:100000 Sheet report*, Soil Conservation Service of NSW, Sydney.

¹⁴ John Holland, 2020, *Sydney Football Stadium Redevelopment- Aboriginal Cultural Heritage Management Plan*, p15

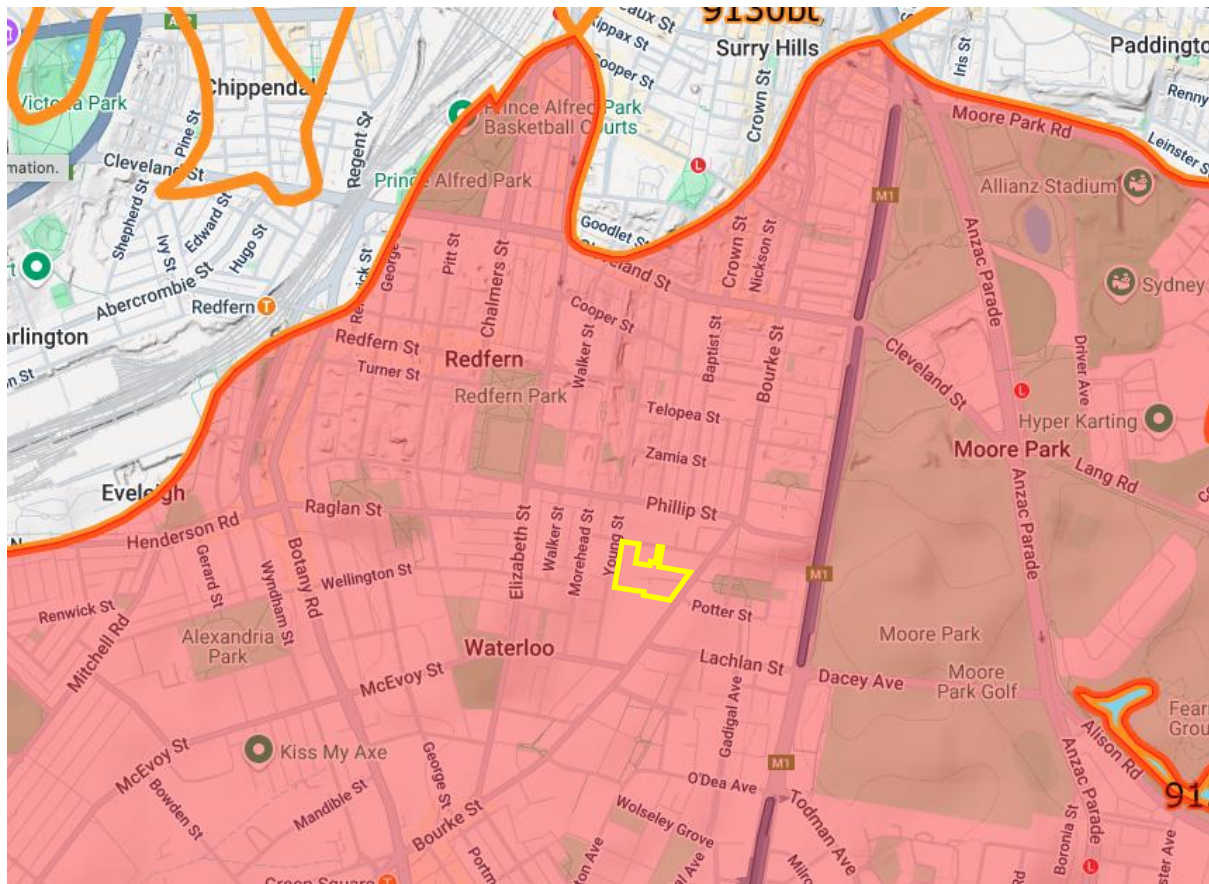


Figure 4.12: Tuggerah soil landscape. Study area indicated in yellow. Source: eSpade.

4.5.2. Hydrology, Landscapes and Resources

Prior to the European colonisation of Australia, the Waterloo area in Sydney was a diverse wetland that was used as a valuable resource for the Gadigal and Wangal people. The landscape of the area included a large swamp (Waterloo Swamp), Sheas Creek and its tributaries and dams including, Upper Dam, Big Waterloo Dam, Little Waterloo Dam and Aldersons Dam that can be seen in early maps of the area (Figure 8.4). Aldersons Dam borders the study area (Figure 4.13).

The study area is also located approximately 950m from Sheas Creek, now known as the Alexandra Canal. The previous wetlands, dams and creeks have been filled or diverted to allow for development. These water sources and their associated tributaries would have provided an abundance of resource diversity and water availability for local Aboriginal people in the past.

The Tuggerah soil landscape is characterised by gently undulating to rolling coastal dune fields. Local relief to 20 m, slope gradients generally 1–10%, but occasionally up to 35%. North–south oriented dunes with convex narrow crests, moderately inclined slopes and broad gently inclined concave swales. Swampy depressions occasionally occur in the larger swales evident in the surrounding Waterloo Swamp, the numerous dams and Sheas Creek and its associated tributaries.

Similarly, the fauna of the Sydney region at and prior to 1788 would have offered an abundant natural resource for the local Aboriginal people. As previously mentioned, the wetlands surrounding the study area would have provided valuable resources for the Gadigal and Wangal people. Typical faunal species within the Sydney region would have consisted of possums, various wallabies and other small marsupials, as well as birds and lizards along with the freshwater fish species and molluscs inhabiting the wetlands.

The vegetation found in the Tuggerah soil landscape, prior to the extensive development and land clearing would have included, smooth-barked apple, old man banksia, with occasional trees of forest oak, bangalay and swamp mahogany. Understorey species would have included smooth parrot-pea, burrawang, wedding bush and slender riceflower. Some sheltered closed-forest species would have included cabbage tree palm and lillypilly. Broad-leaf paperbark may have grown in poorly drained swales.

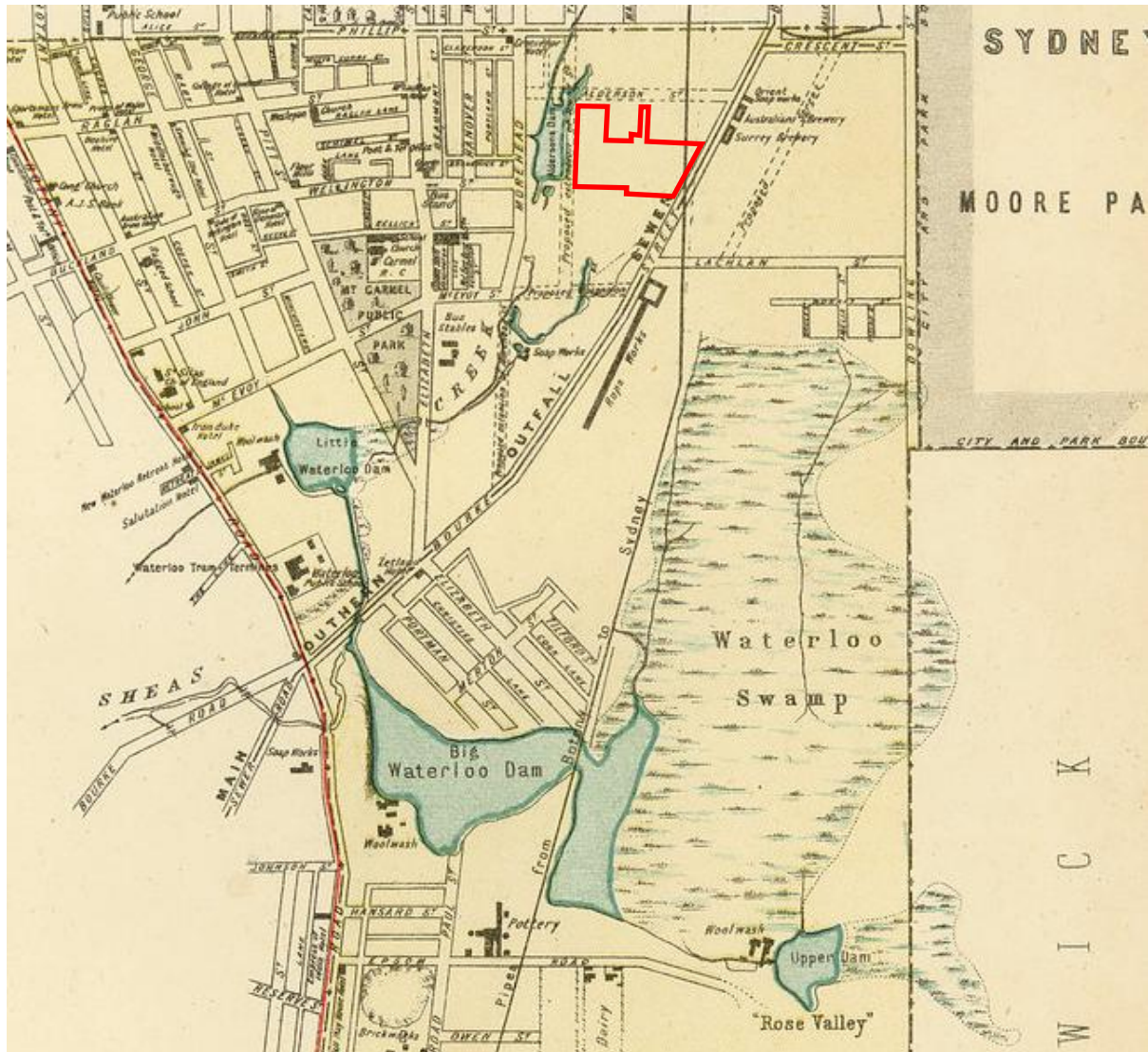


Figure 4.13: Atlas of the suburbs of Sydney – Waterloo 1886-1888. Study area indicated in yellow. Showing proximity to wetland areas and associated dams and creeks. Source: Higinbotham & Robinson. City of Sydney Archives.

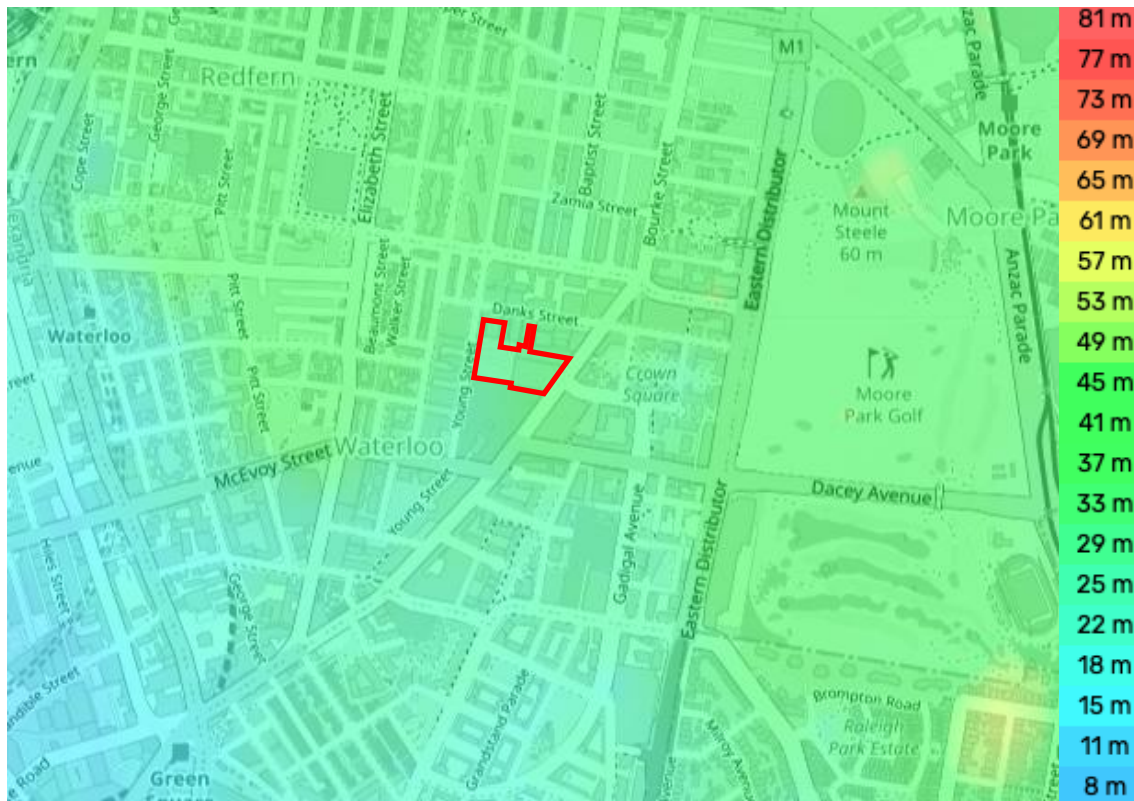


Figure 4.14: Topography map of the study area (indicated in red). Source: Sydney Topographic Map.

4.6. Step 3: Can you avoid harm to the object or disturbance of the landscape feature?

No.

The project proposes bulk excavation work in preparation for a 2 level basement carpark, as well as other ancillary services and landscaping associated with the development. These proposed works cannot be avoided, as they aid in the viability of the whole proposed development (associated with both the early and main SSDA works).

4.7. Step 4: Desktop Assessment

4.7.1. Site Description

The study area is legally described as Lot 1 DP1308636 and Lot 2 DP1308636 and is located at 207-229 Young Street and 881-885 Bourke Street, Waterloo. The study area has a total area of 21,554m². It has an irregular shape, is generally flat and was recently cleared of light industrial and large commercial buildings. The site has vehicle access from Young Street and Bourke Street.

A site visit was conducted by Kate Wine, Principal Heritage Specialist at Curio Projects, on 1 September 2025. The study area is bound by Danks Street to the north, Young Street to the west, Bourke Street to the east and McEvoy Street to the south. It is located within Gadigal Land, in the Sydney Local Government Area (LGA) and is approximately 4km south of the Sydney CBD. The study area is approximately 950m walking distance east of the entrance to the Waterloo Metro Station, approximately 1.1km northeast of the Green Square Train Station and approximately 1.5km southeast of Redfern Train Station. It is also immediately adjacent to a bus stop on Bourke Street. It is partly identified as within the Waterloo Town Centre (Danks Street) in the Housing SEPP.

There are a number of trees along the Danks and Young Street frontages. There are commercial and business premises to the west, high-density residential and business premises to the north, primarily high-density residential to the east and high density residential under construction to the south.

The previous buildings within the study area consisted of light commercial warehousing and offices. The site has seen very little change to the overall occupation boundaries from the 1940s when it is shown to be fully developed. The existing buildings on the site have been demolished prior to Curio being commissioned for this report which limits the physical description to former images of the site. Refer to Figure 4.2. Figures 4.3 to 4.7 illustrate the current condition of the site as viewed from the surrounding streets.



Figure 4.15: Current aerial of the study area showing complete demolition. Source: image supplied by the proponent



Figure 4.16: View of study area looking north along Bourke Street. Source: Curio 2025



Figure 4.17: View looking towards the study area, from the eastern side of Bourke Street. Source: Curio 2025



Figure 4.18: View of north-western corner of the study area at intersection of Young and Danks Streets. Source: Curio 2025



Figure 4.19: View looking east towards the study area from opposite side of Young Street. Source: Curio 2025



Figure 4.20: View looking east towards the study area from the opposite side of Young Street. Source: Curio 2025

4.7.2. Predictive Model

Predictive modelling is a key tool in assessing the archaeological potential of a site and informs appropriate management and mitigation strategies. It draws on environmental context, historical land use and disturbance, and the distribution of nearby sites (including excavated areas and registered AHIMS sites) to anticipate the type and extent of archaeology that may be present.

The assessment of Aboriginal archaeological potential within the study area considers original landforms, the extent of historical disturbance, and the availability of natural resources that would have supported pre-contact Aboriginal occupation. This is supported by comparative research from nearby or similar sites.

For Aboriginal archaeological material to remain in situ, natural soil profiles from before 1788 must be intact. Areas of the site with minimal historical disturbance are therefore considered to have the highest potential for retaining such deposits.

Based on the environmental analysis, disturbance history, and previous archaeological findings, the following predictive model has been developed for the study area:

- There are no previously recorded Aboriginal objects and/or sites located within or directly adjacent to the study area.
- The study area is situated within the Tuggerah soil landscape, which has the potential to preserve archaeological deposits though disturbance may have occurred as a result of displacement due to erosion and landscape disturbance practices.
- The study area has undergone periods of significant disturbance and development, which may have affected the natural form and integrity of the original landscape.
- The visual representation of the study area shows no remnant natural vegetation and an extensive urban environment.
- The study area is located within areas known to have had access to faunal and freshwater resources being Waterloo Swamp, Sheas Creek (Alexandra Canal) and the associated tributaries. These areas would have been favourable locations for resources of past

Aboriginal people. However, the area is likely to have been flood-prone, having been in proximity to these wetlands systems, and is unlikely to have been a place of occupation, but rather one of ephemeral resource gathering.

- Based on the environmental context of the study area and surrounds, it is possible that the area was used by Aboriginal people for short-term or opportunistic occupation or use.
- Based on the AHIMS search results and a consideration of the results of several previous archaeological assessments completed within the wider region surrounding the study area, the following key findings are made:
 - Artefact sites and Potential Archaeological Deposits are the dominant site types as classified on AHIMS. There is one Shell and Artefact site, however this has been classified as Not a Site on AHIMS. Of the six registered sites, two are Valid sites.
 - No known Aboriginal archaeological excavations have been undertaken previously within the study area.
 - Aboriginal site distribution on the Cumberland Plain has been linked to a variety of environmental factors, with proximity to water, stream order, landform and geology variously highlighted as key determinants.
 - High levels of disturbance due to European land use practices in some areas, however, have resulted in the removal of soil deposits, and thus likely eliminated archaeological potential in these affected areas.
 - There is potential for Aboriginal cultural material to be present within a disturbed context.
- Overall, the site is assessed as having **nil-low archaeological potential**.

4.8. Step 5: Further investigation and impact assessment

No.

This Due Diligence Assessment was prepared to investigate the presence or absence of Aboriginal objects and/or sites within the study area, and whether the proposed development has the potential to harm any Aboriginal objects that may exist. The assessment was prepared in accordance with the Due Diligence Code and included the following:

- Comprehensive background research of the AHIMS register and statutory and non-statutory heritage listings
- Analysis of previous assessments that have been completed within the local region surrounding the study area
- Analysis of landscape features and their potential to retain Aboriginal objects
- Analysis of historical land use and its impact on the study area

The assessment has concluded that the site contains nil-low potential. The Due Diligence Code states that, where either the desktop assessment or visual inspection indicates that there are (or are likely to be) Aboriginal objects in the area of the proposed activity, more detailed investigation and impact assessment will be required.

It is recommended that no further assessment is required.

5. Conclusions and Recommendations

5. Conclusions and Recommendations

This report provides an assessment of the impacts of the Main Works and the aboriginal archaeological potential for the development at 881-885 Bourke Street, Waterloo.

5.1. Conclusions

Overall, the Due Diligence Assessment concludes that there is nil-low potential for Aboriginal archaeological resources to be present within the 881-885 Bourke Street study area. As a result, there is no requirement for an Aboriginal Cultural Heritage Assessment Report to be prepared to accompany this Main Works SSDA submission, as outlined under the SEARs items 21.

5.2. Recommendations

In accordance with the above conclusions, the following recommendations are made.

Recommendation 1: Unexpected Finds Procedure

Upon discovery of an archaeological feature that is suspected to be an Aboriginal Unexpected Find (excluding human remains) the following procedure should be followed:

- Cease works in the immediate vicinity of the find.
- Contact the Project archaeologist to verify the nature of the find.
- If Unexpected Find is confirmed as Aboriginal archaeology, the project archaeologist will notify Metropolitan Local Aboriginal Land Council and Heritage NSW of the find. If Unexpected Find is confirmed as not Aboriginal in origin, the project archaeologist will provide advice for works to recommence.
- Project Archaeologist/Metropolitan LALC will undertake a preliminary assessment and recording of the find.
- Formulate archaeological or heritage management plan- specific to nature of the find.
- Implement archaeological/heritage management plan.
- Works may commence once archaeological/heritage management plan has been successfully implemented and the project archaeologist provides sign off to contractor for works to resume in vicinity of find.

References

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Appendix A – Extensive AHIMS Search Results

AHIMS extensive search



AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : Waterloo, Young street

Client Service ID : 1005807

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	Site Types	Reports
45-6-2597	Wynyard St Midden	GDA	56	333469	6247920	Open site	Not a Site	Shell : -, Artefact : -	Midden	102494,10276 3,102765
Contact		Recorders		Mr.D Coe		Permits				
45-6-3899	ES-PAD-2018-01	GDA	56	334251	6247993	Open site	Not a Site	Potential Archaeological Deposit (PAD) : -		105317
Contact		Recorders		Extent Heritage Pty Ltd - Pyrmont - Individual users, Exploration Management Serv		Permits		4818		
45-6-4138	Waterloo Metro Artefacts	GDA	56	333600	6247700	Open site	Valid	Artefact : -		
Contact		Recorders		Mr.Chris Langeluddecke, AMBS Ecology & Heritage		Permits		5387		
45-6-3155	Moore Park AS1	GDA	56	335613	6247909	Open site	Valid	Artefact : -		
Contact		Recorders		Artefact Heritage and Environment - Pyrmont, Artefact Heritage and Environment -		Permits		4019		
45-6-4050	RNE-PAD01	GDA	56	333218	6248353	Open site	Partially Destroyed	Potential Archaeological Deposit (PAD) : -		
Contact		Recorders		Artefact Heritage and Environment - Pyrmont, Artefact Heritage and Environment -		Permits		5205		
45-6-3704	Tay Reserve Artefact	GDA	56	335723	6247268	Open site	Destroyed	Artefact : -		
Contact		Recorders		Artefact Heritage and Environment - Pyrmont, Artefact Heritage and Environment -		Permits				

**** Site Status****Valid** - The site has been recorded and accepted onto the system as valid**Destroyed** - The site has been completely impacted or harmed usually as consequence of permit activity but sometimes also after natural events. There is nothing left of the site on the ground but proponents should proceed with caution.**Partially Destroyed** - The site has been only partially impacted or harmed usually as consequence of permit activity but sometimes also after natural events. There might be parts or sections of the original site still present on the ground**Not a site** - The site has been originally entered and accepted onto AHIMS as a valid site but after further investigations it was decided it is NOT an aboriginal site. Impact of this type of site does not require permit but Heritage NSW should be notified

Report generated by AHIMS Web Service on 20/05/2025 for Daisy Catcliffe for the following area at Lat, Long From : -33.9075, 151.1954 - Lat, Long To : -33.8897, 151.2263. Number of Aboriginal sites and Aboriginal objects found is 6

This information is not guaranteed to be free from error omission. Heritage NSW and its employees disclaim liability for any act done or omission made on the information and consequences of such acts or omission.

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