

28-30 Burrows Road, St Peters

Draft Statement of Heritage Impact

Report to LOGOS

October 2022



 artefact

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EXECUTIVE SUMMARY

Overview

Artefact Heritage has been commissioned by LOGOS Development Management Pty Ltd to prepare this report in accordance with the technical requirements of the Secretary's Environmental Assessment Requirements (SEARs), and in support of the State Significant Development Application (SSD-47601708) for the proposed flight training centre at 28-30 Burrows Road, St Peters.

This Statement of Heritage Impact (SoHI) will address the Non-Aboriginal Cultural Heritage requirements of the SEARs.

The site is located adjacent to a heritage item of state significance, listed on the State Heritage Register (SHR): "Alexandra Canal" (I01621). It is also located opposite an item of local significance, listed on the City of Sydney LEP: "Warehouse "Rudders Bond Store" including interiors" (I1405). However, this item was demolished in 2017 as part of the WestConnex project.

The aim of this SoHI is to identify any heritage items which may be impacted by the proposed works, to determine the level of heritage significance of each item, assess potential impacts to heritage items, recommend mitigation measures to reduce the level of heritage impact and to identify management and statutory obligations.

Conclusions

The SoHI has identified that 28-30 Burrows Road are not heritage listed and do not fulfill the criteria established by Heritage NSW to warrant future listing. However, the property is proximate to two heritage listed sites:

- Alexandra Canal (SHR: I01621; Sydney LEP 2012: I3; Sydney Water s170: 4571712)
- Rudders Bond Store (Sydney LEP 2012: I1405) (Demolished 2017)

The proposed works, which include the installation of a new stormwater outlet into Alexandra Canal will have the following heritage impacts:

- The proposed development at 28-30 Burrows Road will have no direct or indirect impacts on the heritage value of the site, as it is not currently heritage listed and does not meet the criteria to warrant heritage listing,
- The installation of a new stormwater outlet will have moderate direct (physical) impacts and moderate indirect (visual) impacts on the sandstone wall of the Alexandra Canal due to the localised removal and modification of significant historical fabric. Due to the localised area of impact to the Canal wall fabric the overall impact on the entire Alexandra Canal would be considered minor adverse direct and indirect impacts.

The recommendations below will assist in mitigating unnecessary damage and protect the heritage values of the sandstone wall of the Canal.

Recommendations

1.1.1 General Recommendations

The following management guidelines should be followed for all aspects of the proposed works:

- The works have been designed to minimise and avoid impacts on original and highly significant fabric. However, works that require impacts to original fabric should be ‘made good’ once works are complete, in accordance with the guidelines, *How to Carry Out Work on Heritage Buildings & Sites* (NSW Heritage Office 2002). This could include:
 - Reinstating/replacing fabric with identical materials;
 - Where internal surfaces are to be made good after works, care should be taken to ensure that modern materials and finishes that match existing are used for repair work; and
 - Repair should generally match the original element but should be identifiable as new work.
- Where the works could impact original and highly significant heritage fabric, only tradespersons with experience in working with heritage materials should undertake works;
- The methods, tools and materials used should not cause inadvertent damage to original and highly significant heritage fabric within the study areas. Should unexpected damage to significant historic fabric occur, the advice of a heritage specialist should be sought before repairs are made;
- All works are to be undertaken in accordance with the principles and objectives of the Australia ICOMOS *Charter for the Conservation of Places of Cultural Significance* (the *Burra Charter*);
- Where options exist for alternative installation methodologies and materials, that achieve the desired functional outcome, preference should be given to the option that has the least deleterious impact on significant heritage fabric.
- A Photographic Archival Recording (PAR) report should be prepared for the site to document significant fabric and heritage significant views and vistas that would be impacted in accordance with the Alexandra Canal Conservation management Plan Policy 13, 82 and 86. This report should be prepared in accordance with relevant guidelines issues by Heritage NSW.
- A heritage induction for all contractors undertaking the works is required. This heritage induction must be prepared and delivered by a qualified heritage specialist and ensure that all contractors are aware of the nearby heritage listings and understand the heritage significance of said listings, as well as areas to avoid and steps to take if any unexpected damage occurs during works.
- If any artefacts are found during the construction process, they should be incorporated into the interpretation strategy for the entirety of Alexandra Canal in accordance with Policy 86 of the Alexandra Canal CMP.

1.1.2 Protection of Heritage Fabric During Works

The following recommendations and mitigation measures are provided to minimise potential direct impact to original and highly significant fabric of the subject sites:

- Works to original and highly significant fabric should be reversible where possible;
- A suitably qualified heritage consultant should provide management guidelines for the protection of the original features that could potentially be impacted by the works, or are in the vicinity of the works.
- Pursuant to Policy 50 of the Alexandra Canal CMP, all the works on the site must be carried out by skilled tradespeople who have experience working with heritage fabric.
- In accordance with Policy 62 of the Alexandra Canal CMP, where surplus sandstone is dislodged from the wall, it should be salvaged and stored for future conservation works on the Canal.

The following recommendations and mitigation measures are provided in order to minimise potential indirect impact to the heritage items in the vicinity:

- If any inadvertent damage occurs to original and highly significant fabric within and in the vicinity of the study area due to the proposed works, the damage must be reported immediately to the Project Manager and the relevant Heritage Specialists. Damage is to be made good in accordance with specialist heritage advice.

1.1.3 Archaeology

The following recommendations and mitigation measures are provided in order to minimise potential direct impact to the archaeological remains:

- The implementation of an Unexpected Finds Procedure is required for this project, which would involve stop works procedure in the case any unexpected heritage finds occur. A heritage specialist must be contacted immediately to address the unexpected find and determine next steps.
- In conjunction with the above, should significant historical archaeological 'relics,' or other significant remains not predicted by this SoHI, be identified during excavation, there may be a requirement to notify Heritage NSW under section 146 of the Heritage Act. Additional archaeological reporting and management, including consultation with Heritage NSW, may be required prior to works being able to proceed.

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1.0 INTRODUCTION

1.1 Project background

Artefact Heritage has been commissioned by LOGOS Development Management Pty Ltd to prepare this report in accordance with the technical requirements of the Secretary's Environmental Assessment Requirements (SEARs), and in support of the State Significant Development Application (SSD-47601708) for the proposed flight training centre at 28-30 Burrows Road, St Peters.

This Statement of Heritage Impact (SoHI) will address the Non-Aboriginal Cultural Heritage requirements of the SEARs.

The site is located adjacent to a heritage item of state significance, listed on the State Heritage Register (SHR): "Alexandra Canal" (I01621). It is also located opposite an item of local significance, listed on the City of Sydney LEP: "Warehouse "Rudders Bond Store" including interiors" (I1405). However, this item was demolished in 2017 as part of the WestConnex project.

The aim of this SoHI is to identify any heritage items which may be impacted by the proposed works, to determine the level of heritage significance of each item, assess potential impacts to heritage items, recommend mitigation measures to reduce the level of heritage impact and to identify management and statutory obligations.

1.2 Site location and description

The site is located at 28-30 Burrows Road, St Peters (Lot 2/DP 212652 and Lot15/DP32332) with a total area of approximately 8300 square metres. The site is located in the City of Sydney Local Government Area (LGA), at the junction with the Inner West and Bayside LGAs. It is situated within a highly industrialised landscape, abutting industrial properties to the east and west. To the north, the site is bounded by Burrows Road, while to the south it is bounded by Alexandra Canal (Figure 1).

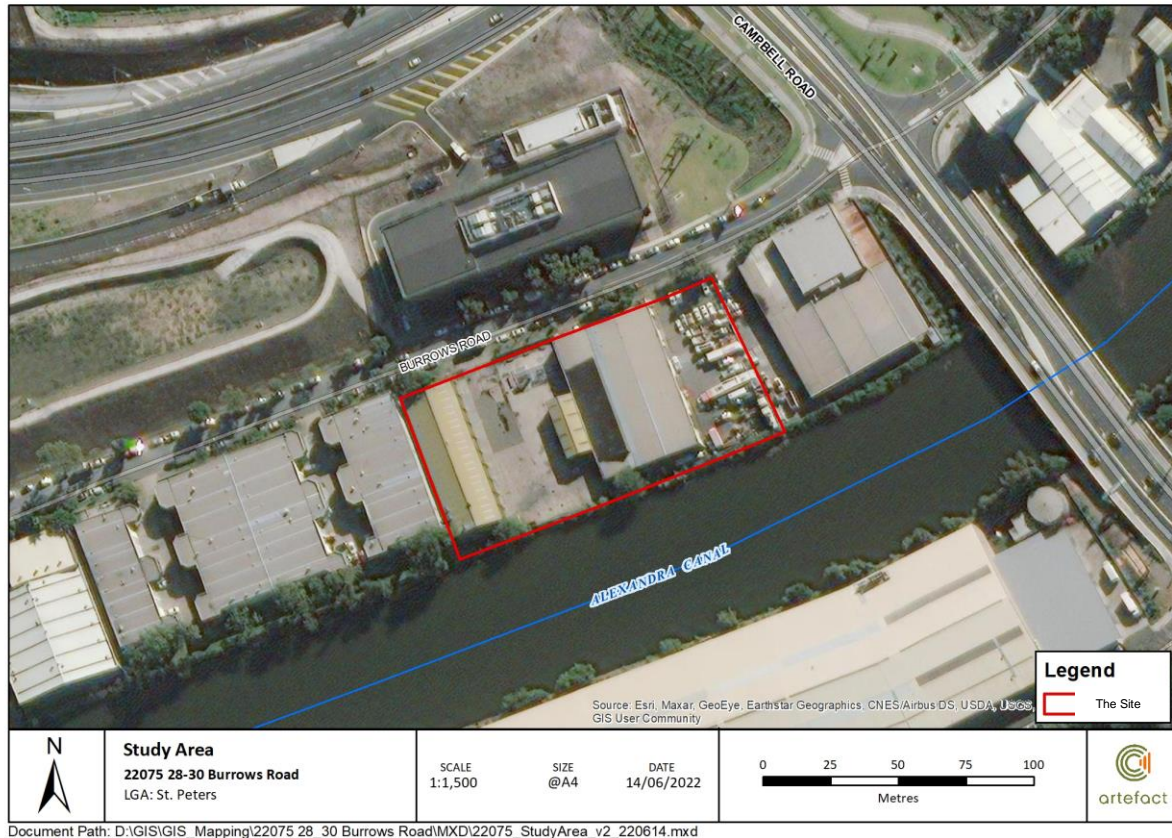


Figure 1. Location map of the site, shown outlined in red (Source: Artefact, 2022)

1.3 Proposal summary

LOGOS has obtained State Significant Development (SSD status) for their proposed development of a flight simulation facility and associated car-parking facilities at 28-30 Burrows Road, St Peters.

The proposed flight training facility will enable pilots and flight crews from Qantas and other airlines to undertake periodic training and testing to meet regulatory requirements by simulating both aircraft and emergency procedural environments. The flight training centre will be situated within a three-storey industrial warehouse.

1.4 Project methodology

The following SoHI has been prepared in accordance with the following guidance documents:

- *Assessing Heritage Significance*, NSW Heritage Office, 2001
- *Statements of Heritage Impact*, NSW Heritage Office and Department of Urban Affairs & Planning, 2002
- *Charter for Places of Cultural Significance (The Burra Charter)*, Australia International Council on Monuments and Sites (ICOMOS), 2013.
- *Assessing Significance for Historical Archaeological Sites and 'Relics'*. Heritage Branch, Department of Planning, 2009.

A site, or buffer, of 200m has been assumed in order to assess the visual impact to heritage items in the vicinity of 28 – 30 Burrows Road, St Peters, in this SoHI.

1.5 Report limitations

Background research prepared for this assessment does not involve the review of primary historical sources, other than primary cartographic sources, and is derived from existing secondary historical sources. Likewise, the assessments of significance for listed heritage items are derived from existing heritage listing information.

The report includes a preliminary assessment of non-Aboriginal archaeology potential only. Further archaeological assessment may be required as part of an Archaeological Research Design.

The report does not include an assessment of Aboriginal cultural heritage values or archaeological remains.

1.6 Report authorship and acknowledgements

This report was prepared by Vanessa Wood (Heritage Consultant), Elanor Pitt (Heritage Consultant), Katherine Chalmers (Heritage Consultant), Pedro Silva (Heritage Consultant), Sarah-Jane Zammit (Senior Heritage Consultant), and reviewed by Scott MacArthur (Principal) and Jenny Winnet (Principal), all of Artefact Heritage.

1.7 Secretary's Environmental Assessment Requirements (SEARs)

The proposal was accepted as a State Significant Development in August 2022 (SSD-47601708). The Secretary's Environmental Assessment Requirements (SEARs) was issued for the project on 12 September 2022 for the preparation of an EIS to accompany the State significant Development. The relevant SEARs heritage requirements for the project are listed in Table 1 below.

Table 1. Secretary's Environmental Assessment Requirements for SSD-47601708

Item	Secretary's Environmental Assessment Requirements	Where addressed in this report
1	Provide a Statement of Heritage Impact (SoHI) prepared in accordance with relevant guidelines as required by the City of Sydney and Heritage NSW.	This SoHI has been prepared in accordance with the relevant guidelines listed in Section 1.4.

2.0 STATUTORY CONTEXT

2.1 Overview

This section discusses the heritage management framework, notably legislative and policy context, applicable to the site.

2.2 Identification of heritage listed items

There are several items of legislation relevant to the site. Heritage listed items within and adjacent to the site were searched for on the following relevant state and federal statutory heritage registers:

- World Heritage List (WHL)
- Commonwealth Heritage List (CHL)
- National Heritage List (NHL)
- State Heritage Register (SHR)
- Sydney Local Environmental Plan (LEP) 2012
- Section 170 Heritage and Conservation Registers.

Non-Statutory registers were also searched, including:

- Register of the National Estate (RNE)
- The National Trust

Items listed on these registers have been previously assessed against the NSW Heritage Assessment guidelines. Assessments of heritage significance as they appear in relevant heritage inventory sheets and documents, are provided in this assessment.

There are several items of legislation that are relevant to the current site. A summary of the relevant Acts and the potential legislative implications are provided below.

2.3 Relevant Legislation

2.3.1 NSW Heritage Act 1977

The NSW *Heritage Act 1977* (Heritage Act) is the primary piece of State legislation affording protection to heritage items (natural and cultural) in NSW. Under the *Heritage Act*, 'items of environmental heritage' include places, buildings, works, relics, moveable objects and precincts identified as significant. Significance is based on historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic values. State significant items can be listed on the NSW State Heritage Register (SHR) and are given automatic protection under the *Heritage Act* against any activities that may damage an item or affect its heritage significance. The *Heritage Act* also protects 'relics', which can include archaeological material, features and deposits.

Under the *Heritage Act*, all government agencies are required to identify, conserve and manage heritage items in their ownership or control. Section 170 of the Act requires all government agencies to maintain a Heritage and Conservation Register that lists all heritage assets and an assessment of the significance of each asset. They must also ensure that all items inscribed on its list are maintained with due diligence in accordance with State Owned Heritage Management Principles approved by the

Government on advice of the NSW Heritage Council. These principles serve to protect and conserve the heritage significance of items and are based on NSW heritage legislation and guidelines.

2.3.1.1 State Heritage Register

The SHR was established under Section 22 of the *Heritage Act* and is a list of places and objects of particular importance to the people of NSW, including archaeological sites. The SHR is administered by Heritage NSW, and includes a diverse range of over 1,500 items, in both private and public ownership. To be listed, an item must be deemed to be of heritage significance for the whole of NSW. For works to an SHR item, a Section 60 application must be prepared for works that are not exempt under Section 57(2) of the *Heritage Act*.

- An item on the SHR, the “Alexandra Canal” (SHR no. I01621), is located adjacent to the site.

2.3.1.2 Archaeological relics and works

The *Heritage Act* also provides protection for ‘relics’, which includes archaeological material or deposits. Section 4 (1) of the *Heritage Act* (as amended in 2009) defines a relic as:

“...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”

Sections 139 to 145 of the *Heritage Act* prevent the excavation or disturbance of land known or likely to contain relics, unless under an excavation permit. Section 139 (1) states:

A person must not disturb or excavate any land knowingly or having reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, damaged or destroyed unless the disturbance is carried out in accordance with an excavation permit.

Excavation permits are issued by the Heritage Council of NSW, or its Delegate, under Section 140 of the *Heritage Act* for relics not listed on the SHR or under Section 60 for impacts within SHR curtilages. An application for an excavation permit must be supported by an Archaeological Research Design (ARD) and Archaeological Assessment prepared in accordance with the NSW Heritage Division archaeological guidelines. Minor works that would have a minimal impact on archaeological relics may be granted an exception under Section 139 (4) or an exemption under Section 57 (2) of the *Heritage Act*. However, the proposal is subject to Part 5.2 (State significant infrastructure) provisions of the EP&A Act, and therefore excavation permits, or exemptions would not be required.

Items identified as ‘works’ do not trigger reporting obligations under the *Heritage Act*, unless they are associated with artefacts and/or assessed to be of State or local significance. Works generally include:

- Former road surfaces or pavement and kerbing.
- Railway infrastructure
- Former water supply (wells, cisterns, drains, pipes) and other service infrastructure, where there are no historical artefacts in association with the item.
- Building footings associated with former infrastructure facilities, where there are no historical artefacts in association with the item.

2.3.1.3 Conservation Management Plans

Under Section 38A of the Heritage Act, a Conservation Management Plan (CMP) should be prepared for items listed on the SHR. The CMP should identify the state heritage significance of the item, set out policies and strategies for the retention of its significance and be prepared in accordance with the guidelines outlined by the Heritage Council.

- The *Alexandra Canal Conservation Management Plan* (DPWS Heritage Design Services, 2004), exists for the adjacent SHR item: “Alexandra Canal” (SHR no. I01621).

2.3.1.4 Section 170 registers

Under the *Heritage Act* all government agencies are required to identify, conserve and manage heritage items in their ownership or control. Section 170 (s170) requires all government agencies to maintain a Heritage and Conservation Register that lists all heritage assets and an assessment of the significance of each asset. They must also ensure that all items inscribed on its list are maintained with due diligence in accordance with State Owned Heritage Management Principles approved by the Government on advice of the NSW Heritage Council. These principles serve to protect and conserve the heritage significance of items and are based on NSW heritage legislation and guidelines.

- An item on the Sydney Water s170 register, “Alexandra Canal No. 89AZ” (Sydney Water no. 4571712), is located adjacent to the site.

2.3.2 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) establishes the framework for cultural heritage values to be formally assessed in the land use planning and development consent process. The EP&A Act requires environmental impacts to be considered prior to land development; this includes impacts on cultural heritage items and places as well as archaeological sites and deposits. The proposed works are subject to assessment under Division 5.1 of the EP&A Act.

The EP&A Act also requires that local governments prepare planning instruments (such as LEPs and Development Control Plans [DCPs]) in accordance with the EP&A Act to provide guidance on the level of environmental assessment required. Schedule 5 of the Sydney LEP 2012 includes a list of items/sites of heritage significance within the LGA.

The proposal was accepted as a State Significant Development in August 2022 (SSD-47601708) under Section 4.36(3) of the EP&A Act.

2.3.2.1 Sydney Local Environmental Plan 2012

Local Environmental Plans (LEPs) are prepared by councils in accordance with the EP&A Act to guide planning divisions for LGAs. The aim of LEPs in relation to heritage is to conserve the heritage significance listed within this schedule.

The site, located in St Peters, falls within the boundary of The City of Sydney LGA. The legal instrument of the City of Sydney is the Sydney LEP 2012. Heritage items listed on the Sydney LEP 2012 are managed in accordance with the provisions of *Section 5.10 Heritage conservation* of the LEP. Under *Clause 5.10(5) Heritage assessment*.¹

The consent authority may, before granting consent to any development—

¹ City of Sydney, *Sydney Local Environmental Plan, Schedule 5.10: Heritage Conservation*, NSW Government, 2012. Accessed <https://www.legislation.nsw.gov.au/#/view/EPI/2012/628/part5/cl5.10>.

(a) on land on which a heritage item is located, or

(b) on land that is within a heritage conservation area, or

(c) on land that is within the vicinity of land referred to in paragraph (a) or (b), require a heritage management document to be prepared that assesses the extent to which the carrying out of the proposed development would affect the heritage significance

- There are no local heritage items listed on the Sydney LEP 2012 within the site.
- The “Alexandra Canal”, listed on the Sydney LEP 2012 as an item of State significance (LEP Item no. I3), is adjacent to the site.
- The Rubbers Bond Store, listed on the Sydney LEP for local significance (LEP item no. I1405), is located north west of the site, however the property was demolished in 2017.

2.3.2.2 Sydney Development Control Plan (DCP) 2012

The Sydney Development Control Plan (DCP) 2012 is a supporting document that complements the provisions contained within the Sydney LEP 2012 and provides general guidelines and specific design detail for sympathetic development on, or in the vicinity of, items listed in Schedule 5 of the Sydney LEP 2012.

Section 3.9 Heritage provides guidelines for the management of change to heritage items and conservation areas, and places in the vicinity of such items and conservation areas. Section 3.9.1 provides guidelines for the preparation of Heritage Impact Statements, with Clause 3.9.1(4) providing the following guidelines:²

(4) The Heritage Impact Statement is to address:

(a) the heritage significance of the heritage item or the contribution which the building makes to the heritage significance of the heritage conservation area;

(b) the options that were considered when arriving at a preferred development and the reasons for choosing the preferred option;

(c) the impact of the proposed development on the heritage significance of the heritage item, heritage items within the vicinity, or the heritage conservation area; and

(d) the compatibility of the development with conservation policies contained within an applicable Heritage Conservation Management Plan or Conservation Management Strategy, or conservation policies within the Sydney Heritage Inventory Report.

Clause 3.9.5 additionally provides provisions to manage developments to, and in the vicinity of, heritage items, in order to protect the significance of heritage items. These provisions aim to ensure that the building envelope, proportions, alignments, materials, colours and finishes of new development is sympathetic to heritage items, their setting and significant views. Clause 3.9.14 provides a provision for

² City of Sydney, *Sydney Development Control Plan – Section 3: General Provisions*, 2012. Accessed https://www.cityofsydney.nsw.gov.au/__data/assets/pdf_file/0005/314429/Section3_DCP2012_170619.pdf.

any work to a heritage item to be consistent with the policy or recommended management guidelines contained within the SHI listing for the heritage item.

This heritage impact statement has been prepared to fulfil Clauses 3.9, 3.9.5, 3.9.14 and 3.10.1 of the Sydney DCP 2012.

2.4 Heritage Listings

2.4.1 Statutory heritage listings

Statutory registers provide legal protection for heritage items. In NSW, the *Heritage Act* and the EP&A Act provide for heritage listings. The SHR, the Section 170 Heritage & Conservation Registers and the environmental heritage schedules of LEPs are statutory listings. Places on the World, National and Commonwealth Heritage Lists are protected under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

A search of all relevant registers was undertaken on 19 July 2022. This search found that although the site has no statutory listings, two items within 200 metres of the site are listed on at least one statutory heritage register.

The results of the heritage registers search are provided in Table 2.

Table 2: Statutory heritage listed items within 200m of the site.

Item	Registered item name	Location	Significance	Listing	Distance from Site	Listing Number
	Alexandra Canal	Alexandra Canal	State	SHR	0 meters (Abutting)	I01621
Alexandra Canal	Alexandra Canal (between Cooks River and Huntley Street) including interior	Alexandra Canal	State	Sydney LEP 2012	0 meters (Abutting)	I3
	Alexandra Canal No. 89AZ	378, Adjacent to Burrows Road, Alexandria, St. Peters, Mascot, Tempe, NSW	State	Sydney Water s170 Heritage and Conservation Register	0 meters (Abutting)	4571712
Rudders Bond Store	Warehouse "Rudders Bond Store" including interior	53–57 Campbell Road, St Peters NSW 2044	Local	Sydney LEP 2012	100 metres	I1405

2.4.2 Non-statutory heritage listings

A search of non-statutory registers, including the Register of the National Estate (RNE) and The National Trust, indicates that there are no non-statutory listings for heritage items within the site. The search identified two items within 200m of the site.

Table 3: Non-statutory heritage listed items within 200m of the site.

Item	Item name	Location	Status	Listing	Distance from Site	Place ID
Alexandra Canal	Alexandra Canal, Airport Dr, Sydney Airport, NSW, Australia	Airport Drive, Sydney Airport, comprising the Alexandra Canal extending from its junction with the Cooks River in the south to its northern limit near Huntley Street, Alexandria.	Interim List (24/09/2002)	RNE (non-statutory archive)	0 meters (Abutting)	103889
	Alexandra Canal (or Shea's Creek)	Alexandra Canal running east and north from Cooks River, around Sydney Airport then through adjoining industrial areas to Alexandria.	N/A	National Trust	0 meters (Abutting)	6586



Figure 2. Heritage map of the site. 28 Burrows Road is highlighted in blue and 30 Burrows Road is shown in Yellow. The adjacent heritage items are outlined in red (Source: Google Earth, 2022)

3.0 HISTORICAL BACKGROUND

3.1 Historical Context of 28 – 30 Burrows Road

Prior to construction of the Alexandra Canal, and in the early days of British settlement, Sheas Creek was a part tidal, narrow flowing tributary of the Cooks River. Europeans frequented the banks of the creek to gather shell from the middens located there, which they used to make lime essential for making mortar.³

The land in St Peters, Newtown and Marrickville was noted as not suitable for agriculture and was described as having shallow water and large swamps.⁴ For this reason, the colonial administrator's focus for agriculture was directed towards Parramatta and the Hawkesbury Rivers. Land use in St Peters, Newtown and Marrickville included kilns for brick making, tanneries, wool washing and chemical manufacturing. The location of the latter was predicated by the Slaughter House Act of 1849 which required all industries involving noxious chemicals be located 1.6km from the city area. The waste matter from these industries was released into Sheas Creek. The brickmaking industry thrived in at Alexandria, Waterloo, Newtown, Marrickville and Tempe, as well as St Peters. The site is adjacent to a former brick works on its western and northern sides. As Sydney's population grew, so did the demand for bricks for terraced housing. Inner city terraces replaced the former small holdings of these areas.⁵

The canal was built by the NSW Department of Public Works and was intended to connect Botany Bay to Sydney Harbour and transport coal, blue metal and building materials to the Sydney docks. Building commenced in 1887 at the junction of Sheas Creek and the Cooks River and works continued to 1905 (Figure 3 and Figure 4). In 1896 the finds associated with Shea's Creek Dugong find (AHIMS ID 45-6-9751) were dug up. However, the newly built canal needed constant maintenance: it silted up quickly had to be dredged and repaired. Large craft could not use it because it was too shallow and affected by the tides. The project was not successful for commercial uses. The wharves were demolished, but the storage areas for wool built on the eastern side continued in use.⁶

The South Sydney Council developed a refurbishment plan in 1997, aimed at transforming the industrial parts of the area to residential use. A second plan by Sydney Water followed in 1998, with further input by architecture students from University of New South Wales. By 1999 urban renewal of the area resulted in housing for 25,000 residents and associated retail outlets and recreational plans for the canal. However, by 2008 the area was declared severely contaminated by chemical waste and not to be further disturbed.⁷

³ Ron Ringer, "From Sheas Creek to Alexandra Canal," The Dictionary of Sydney. Published 2013.
https://dictionaryofsydney.org/entry/from_sheas_creek_to_alexandra_canal#ref-uuid=3234ec4a-2067-c4db-c187-46bf4976cfd5

⁴ Ringer, "From Sheas Creek to Alexandra Canal."

⁵ Ringer, "From Sheas Creek to Alexandra Canal."

⁶ Ringer, "From Sheas Creek to Alexandra Canal."

⁷ Ringer, "From Sheas Creek to Alexandra Canal."

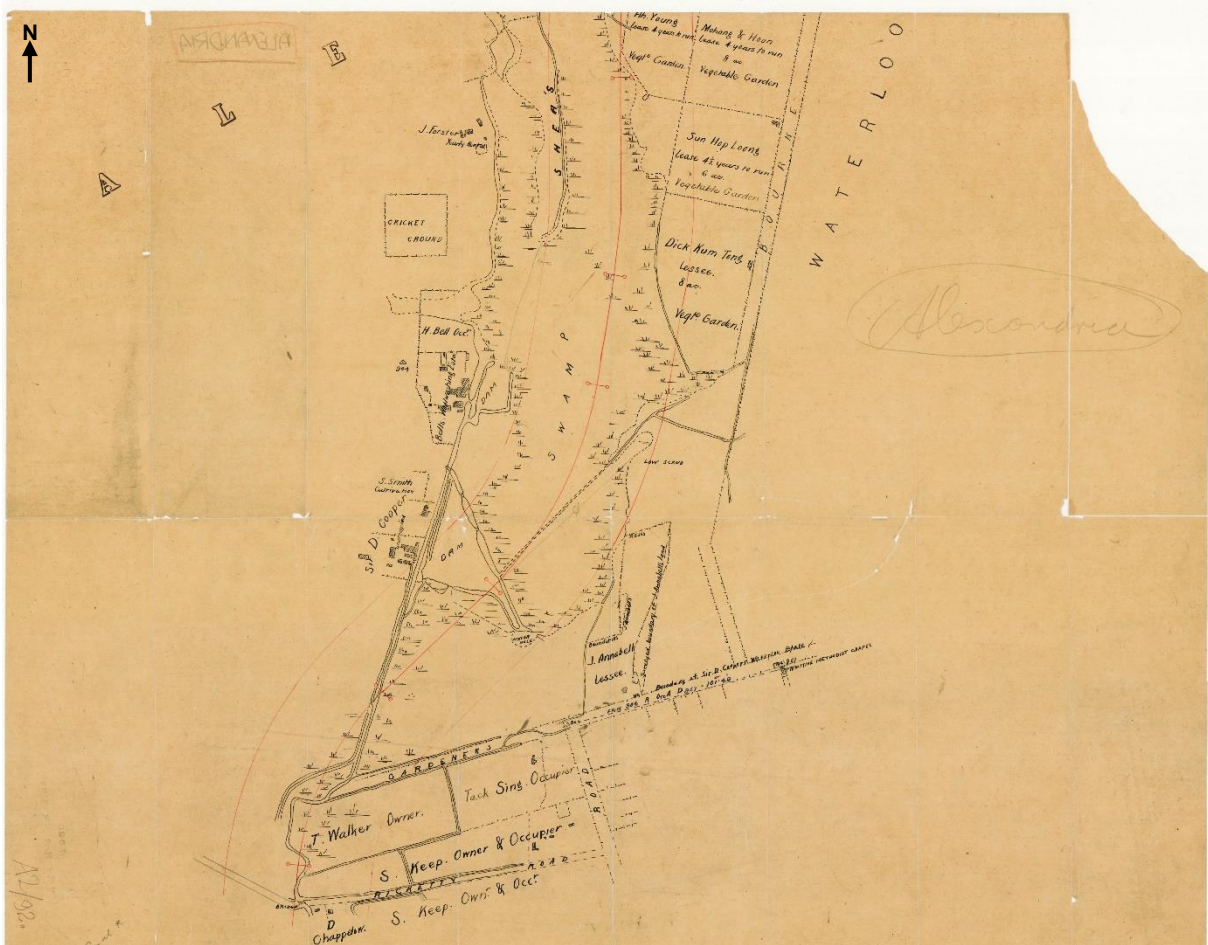


Figure 3. 1889 plan showing the location of a section of the Alexandria Canal (red line) overlaid over the existing industrial area and marsh. Source. SLNSW, SP/A2.

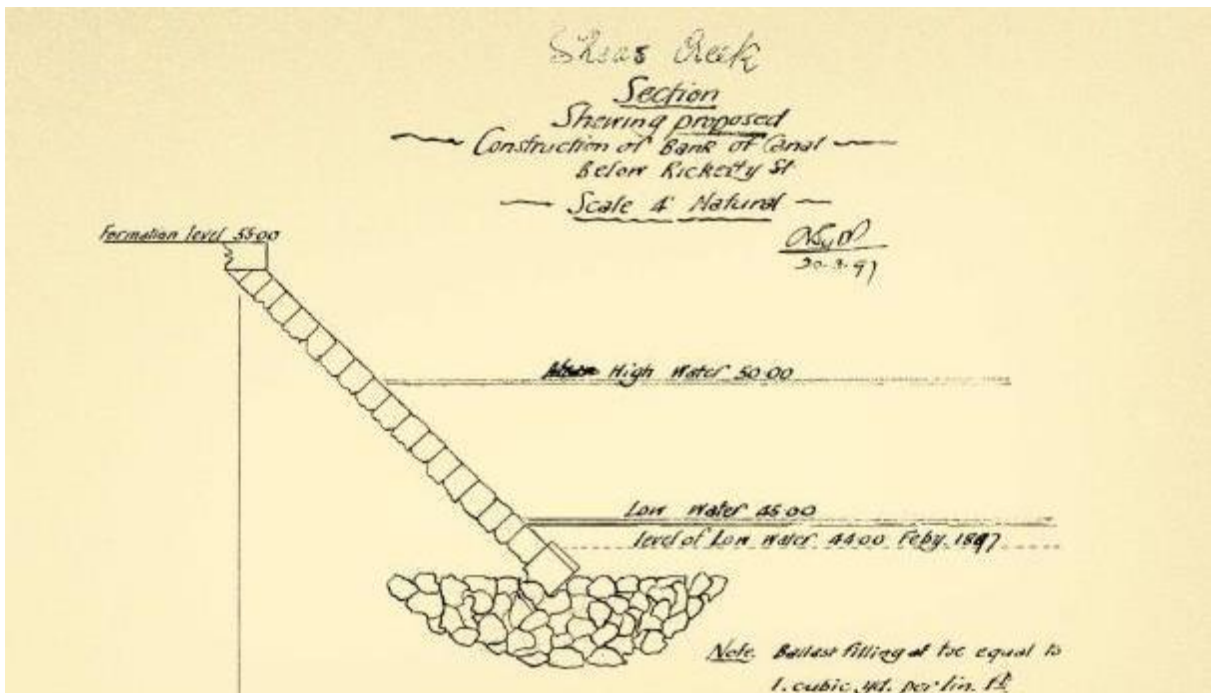


Figure 4. Alexandria Canal Wall cross section diagram Source. Sydney Water.

3.2 Historical Development of 28 – 30 Burrows Road

Analysis of a Parish Map dated to 1823-1825 from the Parish of Alexandria show that the site is situated within the former Waterloo Estate of William Hutchinson (Figure 5). Hutchinson was a convict who arrived in Sydney in 1799. He rose to prominence in Sydney, becoming the Company Director of the Bank of New South Wales in 1829 and later the Company Director of the Mutual Fire Insurance Association in 1840. In 1818, Hutchinson established a water powered flour mill along the banks of Shea's Creek. In 1823, a 1,400-acre grant, including the flour mill, was awarded to Hutchinson before it became part of Daniel Cooper's Waterloo holding in 1825.⁸

The site was utilised as a dam in the second half of the 19th century, as indicated by an 1889 plan showing Shea's Creek and the proposed route of the Alexandra Canal (Figure 6). The dam appears to have been associated with the buildings owned by Sir Daniel Cooper, which were unoccupied at the time of the plan. It is likely that these buildings comprised a flour mill, as Sir Daniel Cooper appears to have owned a number of flour mills.⁹ In 1899, the site was resumed and infilled, along with land along both sides of Shea's Creek, as part of the construction of the Alexandra Canal between 1887 and 1905, following a notification of resumption in the Government Gazette on 14 June 1889.¹⁰ Historical imagery indicates that the site of 28-30 Burrows Road, St Peters, remained undeveloped in 1943 following the resumptions of the 1880s and 1890s (Figure 9).

The City of Sydney Civic Survey, completed in 1948 to 1950 in the St Peters area, notes that the western half of the site (now 28 Burrows Road) was occupied by B.S.R. Welding and Engineering (Figure 7). It designates the eastern portion (now 30 Burrows Road) as occupied by the Artistic Steel Co. in the north-western corner of the lot and the Department of Works and Housing Stores Depot in the rest of the lot (Figure 7). A narrow, rectilinear, one-storey building is shown running along the northern boundary of the western half the site (now 28 Burrows Road), while a small, rectilinear, one-storey building is shown in the north-western corner of the area 30 Burrows Road, labelled as the Artistic Steel Co. (Figure 7). A news article dating to 14 December 1953 mentions that a fire on Burrows Road in St Peters partially destroyed a building occupied by Cannon and Evans, carriers, J.W. and L.C. Rogers, drum reconditioners and B.S.R. Welding and Engineering Co.¹¹ What appear to be narrow rectilinear corrugated iron roofed structures, likely comprising lightweight materials, are visible at 28 Burrows Road in aerial photography by 1955 (Figure 10). The 1955 aerial also shows the beginning of the construction of the existing warehouse structure at 30 Burrows Road (Figure 10).

The c.1949-1972 *City of Sydney - Building Surveyor's Detail Sheets* plan, likely dating to the 1960s, shows the western side (28 Burrows Road) to have been amalgamated into the Australian Fireclay Pty Ltd site to the west, but with no new structures. Mechanical Assemblies Pty Ltd occupied the centre of the site and Mayne Nickless Pty Ltd occupied the eastern portion (30 Burrows Road) (Figure 8). New structures appear on both the Mechanical Assemblies Pty Ltd and Mayne Nickless Pty Ltd portions of the site at this time (Figure 8). The structure at 30 Burrows Road, occupied by Mayne Nickless Pty Ltd, is the first phase of the existing warehouse on the site. It is not until the 1980s that warehouses are visible at number 28 (Figure 12). Since then, no additional large structures appear to have been erected on the site of 28-30 Burrows Road, and neither of the warehouses appear to have been modified.

⁸ Ringer, "From Sheas Creek to Alexandra Canal."

⁹ A. W. Martin, "Cooper, Sir Daniel (1821–1902)," *Australian Dictionary of Biography, National Centre of Biography, Australian National University*, Accessed 23 September 2022, <https://adb.anu.edu.au/biography/cooper-sir-daniel-3253/text4923>.

¹⁰ "Notice to Applicants for Gold Mining Leases," *New South Wales Government Gazette* (Sydney, NSW : 1832 - 1900), 14 June 1889, 4172, accessed 23 Sep 2022, <http://nla.gov.au/nla.news-page13142161>.

¹¹ "Suburban Fire Spectacle," *The Sydney Morning Herald* (NSW : 1842 - 1954), 14 December 1953, 1, accessed 21 Sep 2022, <http://nla.gov.au/nla.news-article18401094>.

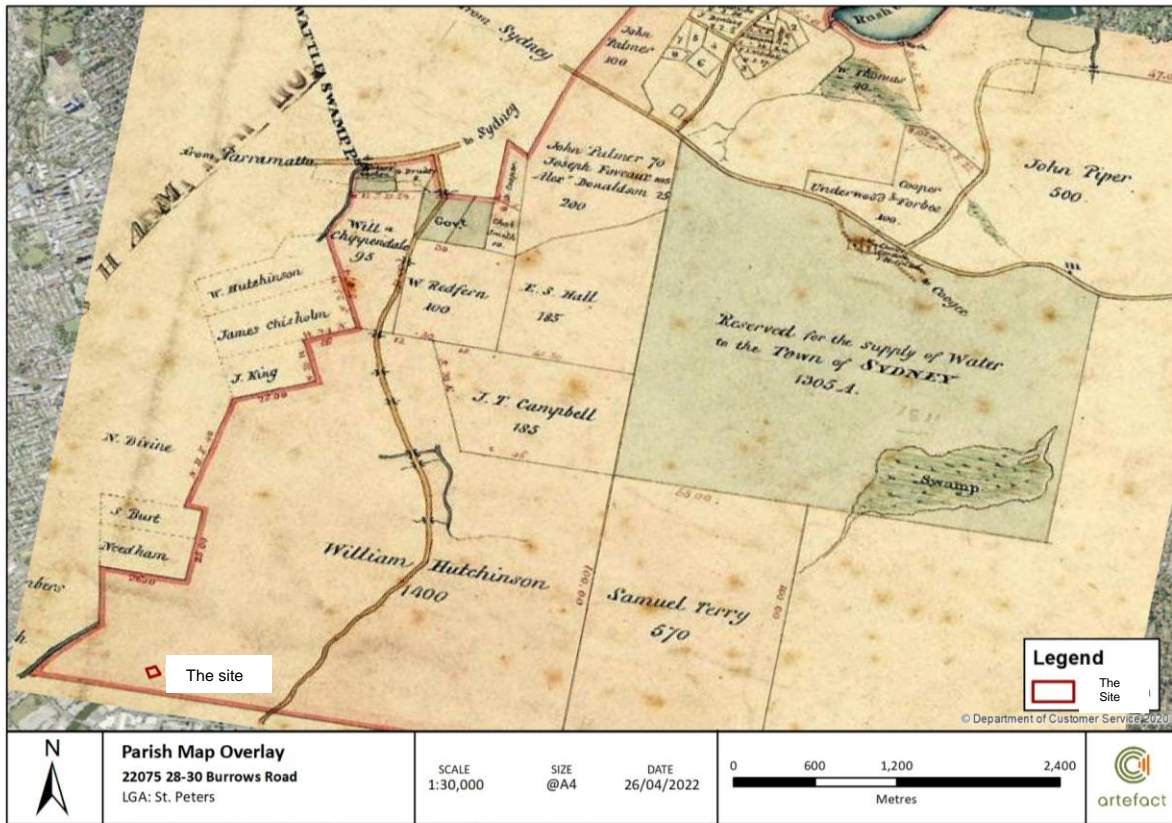


Figure 5. 1823-1825 Parish map. Approximate location of the site outlined in red.

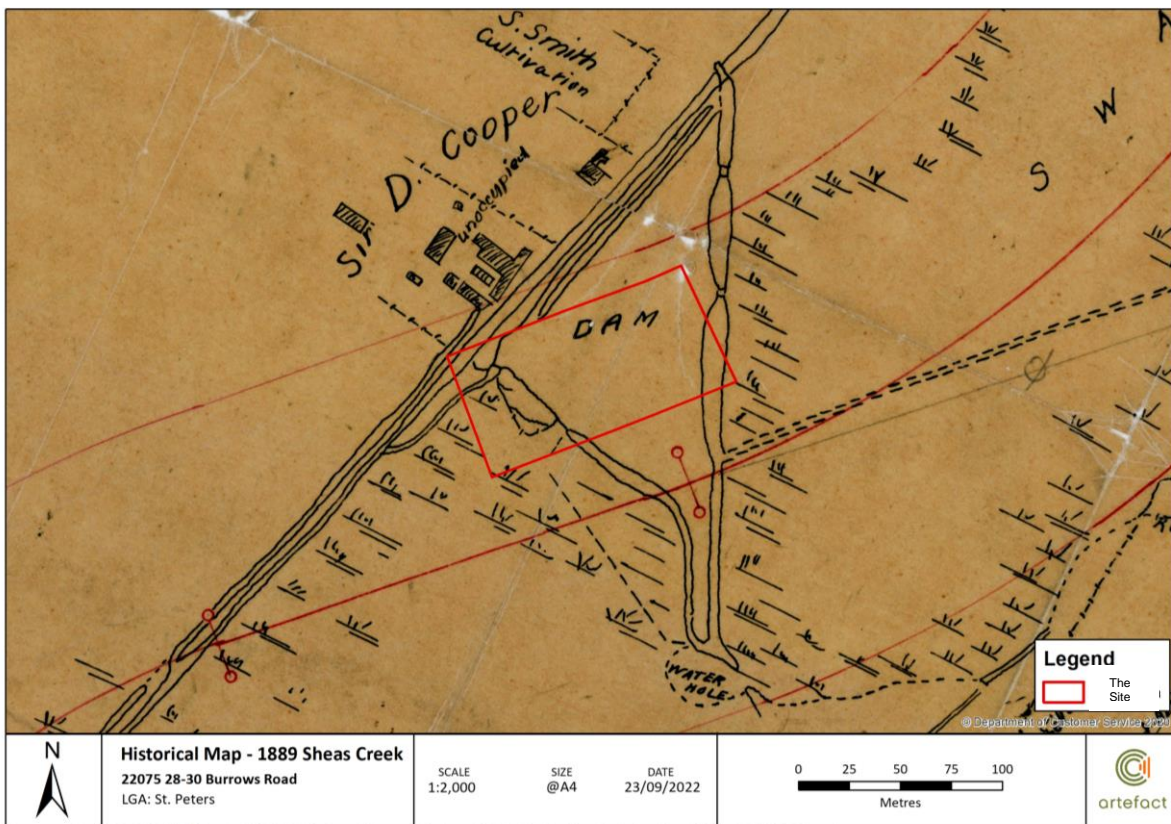


Figure 6. 1889 plan of Shea's Creek with the proposed line of the Alexandra Canal in red. The approximate location of the site is outlined in red.

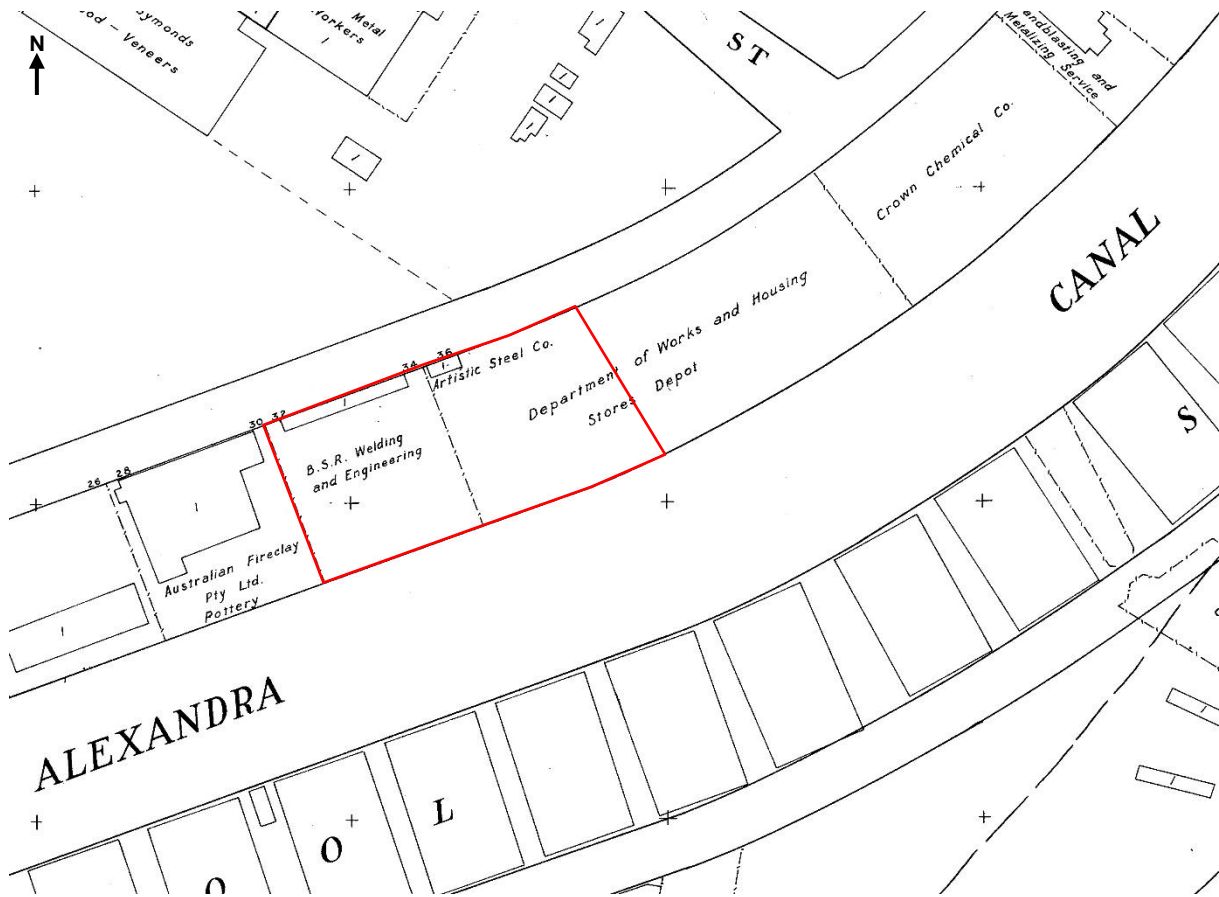


Figure 7. City of Sydney - Civic Survey, 1938-1952, dating from 1948-1950. The location of the site is outlined in red. (Source: City of Sydney Archives, A-00880357)

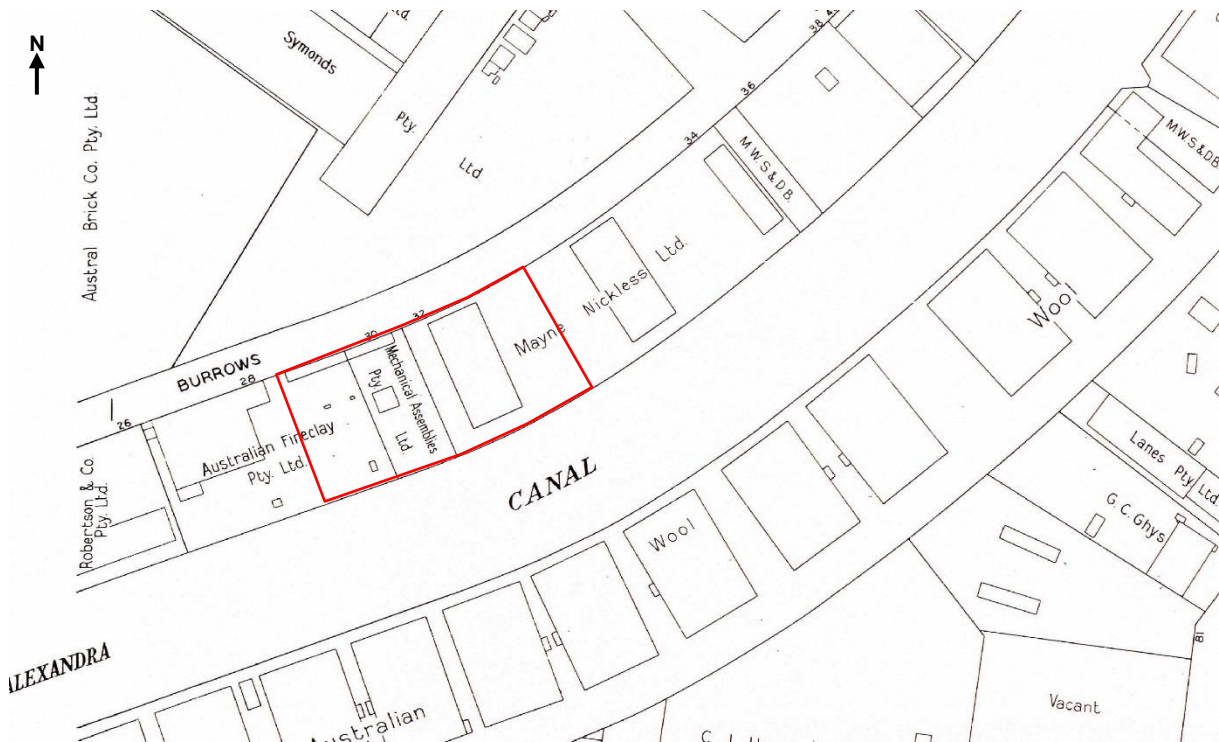


Figure 8. The c.1949-1972 City of Sydney - Building Surveyor's Detail Sheets. The location of the site is outlined in red. (Source: City of Sydney Archives, A-00880202)



Figure 9. Aerial indicating the site remained undeveloped in 1943. (Source: NSW Government Spatial Services, 2021)

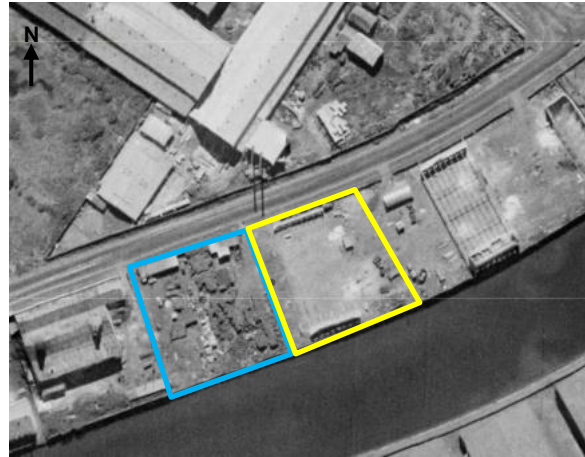


Figure 10. 1955 aerial. Building foundations are evident. (Source: NSW Government Spatial Services, 2021)



Figure 11. 1971 aerial. Large warehouse visible on no.30. (Source: NSW Government Spatial Services, 2021)



Figure 12. 1982 aerial. Warehouses visible on both blocks. (Source: NSW Government Spatial Services, 2021)

4.0 DESCRIPTION AND PHYSICAL EVIDENCE

4.1 Site Inspection

An inspection of the site was conducted on 26 May 2022 by Vanessa Wood (Heritage Consultant) and Emma Jones (Heritage Consultant) of Artefact Heritage. The aim of the site inspection was to identify any potential impacts to the heritage item that may occur as a result of the proposed works. The inspection was undertaken on foot and a photographic record was made.

4.2 Site context and setting

The site is located at 28-30 Burrows Road, St Peters (Lot 15 DP32332 and Lot 2 DP 212652).

Key features of the site are as follows:

- The site is approximately 7,961sqm and is rectangular in shape. The primary frontage to Burrows Road is approximately 123m in length and the site maintains a depth of approximately 63.5m.
- The site has a high point at an RL of 2.85 within the hardstand areas and low point of RL 2.34 towards the canal. The site is currently occupied by two industrial / warehouse buildings with a large hardstand area for vehicle parking and deliveries. Alexandra Canal runs along the southern boundary of the site. A Site Survey Plan accompanies the application which details the topographic characteristics of the site.
- Limited vegetation is located along both the road frontage and the canal. The proposed development is to include a setback of 10m along the southern boundary to align with the City of Sydney's vision for a pedestrian and cycling network along the water's edge.
- Vehicular access to the site from the local road network is available from Burrows Road which links the site to the WestConnex road network in the north and Sydney Airport to the west.
- Two stormwater outlets are currently in place from the site into the Alexandra Canal. A new stormwater outlet is being proposed as part of the development.
- Industrial land uses extend along Burrows Road and Euston Road. St Peters railway station is approximately 1.5km from the site. The nearest residential neighbours south of the site are about 300m away and are separated by industrial warehouse buildings and the Alexandra Canal.

Key features of the locality are:

- The site is approximately 6km south-west of the Sydney CBD. It is close to Sydney Airport (1km north) and the Gateway Project which will link the new St Peters Interchange with Sydney Airport domestic and international terminals and Port Botany. A new bridge will be constructed over Canal Road.

The site is surrounded by a variety of uses, including:

- North: The site has a direct road frontage to Burrows Road, close to the intersection with Campbell Road. Directly opposite the site to the north is the Westconnex Transurban MCC Main Office which

comprises car parking facilities for motorists at the St Peters interchange. Sydney Park is further north on the opposite side of Campbell Parade.

- East: The immediately adjoining site to the east comprises industrial development. Campbell Road and Campbell Road Bridge are further east, with additional industrial land uses on the opposite side of Alexandra Canal, including Alexandria and Rosebery. Campbell Road connects the site to the broader Westconnex road network.
- South: The site is bound to the south by Alexandra Canal, a State Significant Heritage Item. Additional industrial land uses are located across the canal to the south, primarily comprising warehouse and distribution centres. Gardeners Road and Bourke Street provide access to Mascot and Eastlakes. Sydney Kingsford Smith Airport is further south.
- West: The immediately adjoining land comprises industrial development. The St Peters WestConnex Interchange is located to the north-west, with the Princes Highway beyond. Further west is low density residential and industrial land uses in the suburb of Sydenham. Sydenham Train Station is approximately 1.5km west of the site, providing services to the Sydney CBD (Figure 1).

4.2.1 30 Burrows Road

30 Burrows Road contains a single large warehouse to the western portion of the block. The eastern portion contains a car park.

The extant single-storey structure contains several different workspaces. The exterior walls are predominantly constructed of brick, however, there is some corrugated iron cladding to the southern façade. Although there is some timber detailing to the north and western facades, this appears to be weathered and in fair condition. Various signage has also been mounted onto the brickwork.

Primary access to the warehouses is provided on the eastern façade. This is provided by a series of large roller doors that are separated by corrugated metal sheeting. The interior shell of the workspaces is consistent across the warehouse. This includes corrugated metal partition walls, concrete floors and a rusted metal ceiling (Figure 13 to Figure 33).



Figure 13. Western extent of no.30, looking eastwards from Burrows Road (Source: Artefact, 2022)



Figure 14. Warehouse entry facing Burrows Road (Source: Artefact, 2022)



Figure 15. Interior of warehouse, with entry facing Burrows Road (Source: Artefact, 2022)



Figure 16. Eastward view of northern façade of extant structure from Burrows Road (Source: Artefact, 2022)



Figure 17. Intersection between northern and eastern facades, looking south from Burrows Road (Source: Artefact, 2022)



Figure 18. Looking south-east across the carpark from Burrows Road (Source: Artefact, 2022)



Figure 19. Eastward view to no.30 from Burrows Road (Source: Artefact, 2022)



Figure 20. Looking east towards the boundary fence (Source: Artefact, 2022)



Figure 21. View south from the car park, noting the block wall (Source: Artefact, 2022)



Figure 22. Looking west towards the eastern façade of the warehouse (Source: Artefact, 2022)



Figure 23. Interior of the northernmost warehouse space (Source: Artefact, 2022)



Figure 24. Southern extent of the warehouse building, looking south-west from the car park (Source: Artefact, 2022)



Figure 25. Interior of the southernmost warehouse space (Source: Artefact, 2022)



Figure 26. Looking north from southern extent of warehouse (Source: Artefact, 2022)



Figure 27. Southern fence, determining boundary between plot and the Alexandra Canal. Note the southern portion of the site is predominately used for storage (Source: Artefact, 2022)



Figure 28. Southern façade, looking east. Note the change in material from corrugated iron to brick. (Source: Artefact, 2022)



Figure 29. Southern façade, looking west. (Source: Artefact, 2022)



Figure 30. View of canal from southern boundary (Source: Artefact, 2022)



Figure 31. Interior of south-western room, accessible from southern façade. (Source: Artefact, 2022)

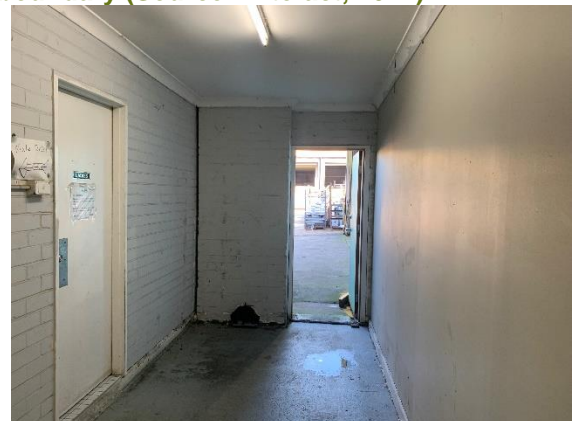


Figure 32. Interior corridor, with opening onto 28 Burrows Road. (Source: Artefact, 2022)



Figure 33. Junction between western and southern facades, noting change in material (Source: Artefact, 2022)

4.2.2 28 Burrows Road

28 Burrows Road contains a large warehouse to the western portion of the block. The eastern portion contains a shed, with a carpark in the middle. It is bounded by Burrows Road to the north and Alexandra Canal to the south.

The warehouse is a single-story brick structure. The eastern façade is comprised of a series of roller doors that open onto the car park. These are divided by dark grey metal sheeting, which appears to be relatively new. A small awning structure, containing machinery, is attached to the southern façade. There is also a separate concrete structure with an awning in this area (Figure 34 to Figure 57).

The shed, constructed from corrugated sheeting, appears to be in a good condition.



Figure 34. View looking south from Burrows Road (Source: Artefact, 2022)



Figure 35. View of entry, looking south from Burrows Road (Source: Artefact, 2022)



Figure 36. Looking north-east towards extent of 28 Burrows Road (Source: Artefact, 2022)



Figure 37. View south, warehouse visible at right (Source: Artefact, 2022)



Figure 38. Detail of warehouse, looking south from Burrows Road. Junction of north and east façades. (Source: Artefact, 2022)



Figure 39. Looking west towards eastern façade. Note the yard has been used for storage. (Source: Artefact, 2022)



Figure 40. Detail of eastern façade. Metal sheeting appears new. (Source: Artefact, 2022)



Figure 41. Interior of northernmost extent of shed (Source: Artefact, 2022)



Figure 42. Interior of northernmost extent of shed (Source: Artefact, 2022)



Figure 43. Interior of northernmost extent of shed (Source: Artefact, 2022)



Figure 44. Interior of southernmost extent of shed (Source: Artefact, 2022)

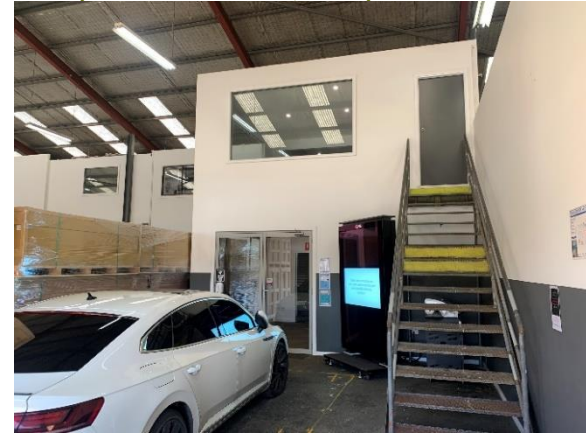


Figure 45. Interior of southernmost extent of shed (Source: Artefact, 2022)



Figure 46. Southern façade, looking east (Source: Artefact, 2022)



Figure 47. Intersection between west and south facades (Source: Artefact, 2022)



Figure 48. Side passage, warehouse on right. Looking north (Source: Artefact, 2022)



Figure 49. Detail of machinery and awning to southern façade (Source: Artefact, 2022)



Figure 50. Eastern corner of southern façade. (Source: Artefact, 2022)



Figure 51. Detail of concrete structure with awning. (Source: Artefact, 2022)



Figure 52. Southern boundary fence, canal beyond (Source: Artefact, 2022)



Figure 53. Detail of the Alexandra Canal wall (Source: Artefact, 2022)



Figure 54. Looking east towards boundary of 28 Burrows Road. Shed visible to left. (Source: Artefact, 2022)



Figure 55. View of shed, looking north from southern boundary. (Source: Artefact, 2022)



Figure 56. Interior of shed (Source: Artefact, 2022)



Figure 57. Exterior of shed (Source: Artefact, 2022)

4.2.3 Alexandra Canal Wall

The sandstone wall lining Alexandra Canal is not a structural wall and instead acts as a lining for the earthen embankment behind which is the main wall of the canal.¹² The ashlar sandstone blocks are arranged in a broken range bond which utilises varying sizes of stone block to construct each course. This style of wall construction was likely used as it was an economic use of sandstone and created a structure durable enough to withstand the conditions placed on the embankment. The wall is anchored into a stone rubble foundation and topped with a sandstone cap stone (Figure 58 to Figure 66).¹³

¹² WestConnex, *New M5 Urban Design and Landscape Plan: Appendix E: Alexandra Canal Sub Plan, Heritage Impact Assessment*, 2017. Accessed: <https://www.westconnex.com.au/media/xmqppn4l/new-m5-alexandra-canal-udlp-sub-plan-final-dec-2017.pdf>.

¹³ WestConnex, *WestConnex: Appendix E Alexandra Canal Sub-Plan Final*, 2017, 338.



Figure 58. Alexandra Canal sandstone wall from 28 Burrows Road showing existing stormwater outlet (Source: Artefact 2022)



Figure 59. Wider shot of Alexandra Canal Sandstone wall from 28 Burrows Road (Source: Artefact 2022)



Figure 60. Sandstone capstone of Alexandra Canal Sandstone wall (Source: Artefact, 2022)



Figure 61. View of Alexandra Canal western wall adjacent to 28 Burrows Road, from the eastern bank (Source: LOGOS, 2022)



Figure 62. Stormwater outlet adjacent to 28 Burrows Road, view from the eastern bank (Source: LOGOS, 2022)



Figure 63. Canal wall adjacent to 30 Burrows Road, showing another storm water outlet, which has been releasing acidic drainage indicated by the lack of algae. (Source: LOGOS, 2022)



Figure 64. Alexandra Canal wall adjacent to 30 Burrows Road (Source: LOGOS, 2022)



Figure 65. Alexandra Canal wall adjacent to 30 Burrows Road (Source: LOGOS, 2022)



Figure 66. Alexandra Canal wall adjacent to the north eastern boundary of 30 Burrows Road (Source: LOGOS, 2022)

5.0 ASSESSMENT OF HERITAGE SIGNIFICANCE

5.1 Significance assessment criteria

5.1.1 Built heritage

Determining the significance of heritage items or a potential archaeological resource is undertaken by utilising a system of assessment centred on the *Burra Charter* of Australia ICOMOS.¹⁴ The principles of the charter are relevant to the assessment, conservation and management of sites and relics. The assessment of heritage significance is outlined through legislation in the *Heritage Act* and implemented through the *NSW Heritage Manual*, the *Archaeological Assessment Guidelines* and the 2009 *Assessing Significance for Historical Archaeological Sites and Relics*.

If an item meets one of the seven heritage criteria, and retains the integrity of its key attributes, it can be considered to have heritage significance. The significance of an item or potential archaeological site can then be assessed as being of local or state significance.

'*State heritage significance*', in relation to a place, building, work, relic, moveable object or precinct, means significance to the State in relation to the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item.

'*Local heritage significance*', in relation to a place, building, work, relic, moveable object or precinct, means significance to an area in relation to the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item.

Table 4. NSW Heritage Assessment Criteria

Criteria	Description
A – Historical Significance	An item is important in the course or pattern of the local area's cultural or natural history.
B – Associative Significance	An item has strong or special associations with the life or works of a person, or group of persons, of importance in the local area's cultural or natural history.
C – Aesthetic or Technical Significance	An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the local area.
D – Social Significance	An item has strong or special association with a particular community or cultural group in the local area for social, cultural or spiritual reasons.
E – Research Potential	An item has potential to yield information that will contribute to an understanding of the local area's cultural or natural history.
F – Rarity	An item possesses uncommon, rare or endangered aspects of the local area's cultural or natural history.

¹⁴ Australia ICOMOS, *The Burra Charter: The Australia ICOMOS Charter for places of cultural significance* (Burwood, Victoria: Australia ICOMOS, 2013).

G – Representativeness

An item is important in demonstrating the principal characteristics of a class of NSW’s cultural or natural places of cultural or natural environments (or the cultural or natural history of the local area).

5.2 Non-Aboriginal (historical) archaeology

5.2.1 Introduction

This section discusses the site’s potential to contain historical archaeological resources. The potential for the survival of archaeological remains is significantly affected by activities which may have caused ground disturbance. This assessment is therefore based on consideration of current ground conditions, and analysis of the historical development of the site.

‘Archaeological potential’ refers to the likelihood that an area contains physical remains associated with an earlier phase of occupation, activity or development of that area. This is distinct from ‘archaeological significance’ and ‘archaeological research potential’. These designations refer to the cultural value of potential archaeological remains and are the primary basis of the recommended management actions included in this document.

5.2.2 Archaeological potential

The archaeological potential of each site is presented in terms of the likelihood of the presence of archaeological remains, considering the land use history and previous impacts at the site. This evaluation is presented using the following grades of archaeological potential:

Table 5: Grading of archaeological potential

Grading	Rationale
Nil	No evidence of historical development or use, or where previous impacts would have removed all archaeological potential
Low	Research indicates little historical development, or where there have been substantial previous impacts, disturbance and truncation in locations where some archaeological remains such as deep subsurface features may survive
Moderate	Analysis demonstrates known historical development and some previous impacts, but it is likely that archaeological remains survive with some localised truncation and disturbance
High	Evidence of multiple phases of historical development and structures with minimal or localised twentieth century development impacts, and it is likely the archaeological resource would be largely intact

5.2.3 Archaeological significance

The significance assessment of historical archaeological sites and items requires a specialised framework in order to consider the range of values associated with each site/item. This because of the challenges associated with the often unknown nature and extent of buried archaeological remains and judgment is usually based on anticipated attributes.

The value of archaeological sources primarily lies in their research potential or the ability to provide additional information about a site/item that is not contained in historical records. The assessment of archaeological research potential is augmented by additional three questions posed by Bickford and Sullivan.¹⁵ The significance assessment of the site’s potential archaeological remains has been carried out using these three questions, as follows:

- *Can the site contribute knowledge that no other resource can?*
- *Can the site contribute knowledge that no other site can?*
- *Is this knowledge relevant to general questions about human history or other substantive questions relating to Australian history, or does it contribute to other major research questions?*

The archaeological potential and significance are addressed in Criterion E - Research Potential in Table 6 below.

5.3 Significance of 28-30 Burrows Road, St Peters

5.3.1 Assessment of Heritage Significance

The significance assessment for 28-30 Burrows Road is contained is contained in Table 6.

Table 6. Significance assessment of the heritage item

Criteria	Explanation
A – Historical Significance	<p>The site contributes to the late industrial history of St Peters, but the extant structures are not important in the course or pattern of the local area’s cultural history.</p> <p>The site does not achieve this significance criterion at the local level.</p>
B – Associative Significance	<p>The site and its extant industrial buildings dating to the second half of the 20th century appear to have been used by multiple companies for various industrial and storage purposes. The site does not have a strong or special association with the life or works of a person, or group of persons, of importance in the local area’s cultural history.</p> <p>The site does not achieve this significance criterion at the local level.</p>
C – Aesthetic or Technical Significance	<p>The structures are typical of industrial warehouses dating to the second half of the 20th century. The site is not important in demonstrating aesthetic characteristics or a high degree of creative or technical achievement in the local area.</p> <p>The site does not achieve this significance criterion at the local level.</p>

¹⁵ Anne Bickford and Sharon Sullivan, “Assessing the Research Significance of Historic Sites,” in *Site Surveys and Significance in Australian Archaeology*, ed. Sharon Sullivan and Sandra Bowdler (Canberra: Research School of Pacific Studies, ANU, Canberra, 1984), 19–26.

Criteria	Explanation
D – Social Significance	<p>The site does not appear to have a strong or special association with a particular community or cultural group in the local area for social, cultural or spiritual reasons.</p> <p>The site does not achieve this significance criterion at the local level.</p> <hr/> <p>The site's development history can be broken up into the following phases:</p> <ul style="list-style-type: none">• Phase 1 (c.1788-1889) – Early industry• Phase 2 (c.1889-1940s) – Resumption and vacant land• Phase 3 (c.1940s-Present) – Industrial development <p>Phase 1 (c.1788-1889) involved the excavation of the marshy area along Shea's Creek for the creation of a dam associated with Sir Daniel Cooper's industrial site, likely a flour mill. The excavation of the dam would have removed any evidence of earlier activities on the site of the marsh. This phase would exhibit the cutting for the dam as well as accumulated residual fill, which could include sporadic artefacts, representing a mix of intentional deposition events or accidental loss of personal or objects associated with industry. The potential for artefactual evidence or features relating to this phase is low. This phase is unlikely to provide answers to general questions about human history, other substantive questions relating to Australian history or contribute to other major questions about early industries in the Sydney area, as such information has been obtained from similar industrial sites. The archaeological resource from Phase 1 would be unlikely to reach threshold for local significance under the criterion of research potential.</p>
E – Research Potential	<p>Phase 2 (c.1889-1940s) involved the resumption of the site and subsequent infilling of the dam. The land appears to have then been vacant during the first half of the 20th century. This phase would likely exhibit a single backfilling event. The backfill is likely to contain a mix of artefactual deposits and building materials, either from the nearby vicinity, such as that of the flour mill, or from a site elsewhere. As the site appears to have remained vacant, subsequent deposition events are unlikely during this period and any artefactual evidence is likely to be the result of sporadic accidental loss of personal effects. The potential for such archaeological resources is moderate. Evidence of backfilling would comprise secondary archaeological evidence, which would not meet the threshold of local significance as secondary remains do not contribute to our understanding of the operation of the site. This phase has little research potential, as there is little potential for such evidence to demonstrate information not readily available from other sites or historical resources. This phase would not be relevant to general questions about human history, other substantive questions relating to Australian history or contribute to other major questions about early industries in the Sydney area. The archaeological resource from Phase 2 would not reach the threshold for local significance under the criterion of research potential.</p> <p>Phase 3 (c.1940s-Present) represents the industrial development of the site in the second half of the 20th century. During this phase, the site initially contained narrow industrial warehouse buildings along the northern boundary of the site, but these were gradually replaced with the</p>

Criteria	Explanation
	<p>larger and currently extant industrial warehouses. Such buildings, built on concrete slabs on the ground level, are unlikely to have extensive foundations that would have impacted earlier phases. Some evidence of the footings of the earlier industrial buildings may remain extant. The presence of artefacts related to this phase is unlikely. The potential of archaeological remains associated with this phase is high as the later buildings from this phase are currently extant and the footings and services for the earlier industrial buildings may be intact. This phase has no research potential, as there is no potential for such evidence to demonstrate information not readily available from other sites or historical resources. This phase would not be relevant to general questions about human history, other substantive questions relating to Australian history or contribute to other major questions about 20th century industries in the Sydney area. The archaeological resource from Phase 3 would not reach the threshold for local significance under the criterion of research potential.</p>
F – Rarity	<p>The site, containing typical industrial buildings dating to the second half of the 20th century, does not possess uncommon, rare or endangered aspects of the local area’s cultural or natural history.</p> <p>The site does not achieve this significance criterion at the local level.</p>
G – Representativeness	<p>The structures are representative of industrial warehouse dating to the second half of the 20th century but are not particularly important examples that demonstrate the principal characteristics of such building types.</p> <p>The site does not achieve this significance criterion at the local level.</p>

5.3.2 Statement of significance

The industrial warehouse structures at 28-30 Burrows Road, which date to the second half of the 20th century, contribute to the understanding of St Peters as an industrial area throughout the 19th and 20th centuries. Although the structures are representative of 20th century industrial warehouses, they have no outstanding features that demonstrate the principal characteristics of such building types. The buildings also do not possess uncommon, rare or endangered aspects of the local area’s cultural or natural history.

The site has low potential for remains of early industry in the local area associated with the use of the site as a dam connected to a flour mill owned by Sir Daniel Cooper during the 19th century (Phase 1:1788-1889). Any artefactual deposits associated with this phase would be residual and sporadic in nature. This archaeological resource would be unlikely to meet the threshold for local significance due to limited research potential. The site has moderate potential for artefactual remains associated with the resumption and backfilling of the dam in c.1889, as well as sporadic accidental deposition of personal effects during the vacancy of the land (Phase 2: c.1889-1940s). Such remains would be decontextualised, and as such, would have no research potential and would not meet the threshold for local significance. The site has high potential for remains of the footings and services of the industrial warehouses dating to the second half of the 20th century (1940s-Present), but such remains would be unlikely to be associated with artefactual deposits. Such remains have no research potential and would not meet the threshold for local significance.

The site does not meet the threshold for local historical, aesthetic, associative or social significance and does not meet the local threshold for research potential, rarity or representativeness.

5.4 Nearby heritage items

As per section 2.7 (Table 2) there are two heritage items identified within 200 meters of 28-30 Burrows Road, St Peters.

5.4.1 Statement of significance: Alexandra Canal

The following statement of significance for the Alexandra Canal has been extracted from the SHI listing:

Alexandra Canal is of high historic, aesthetic and technical/research significance. Historically, it is a rare example of 19th century navigational canal construction in Australia, being one of only two purpose built canals in the State, with one other known example in Victoria. It has the ability to demonstrate the NSW Governments initiative to create water transport as a means of developing an industrial complex in the Alexandria and Botany areas and exploiting the use of unemployed labour to achieve its scheme.

It played a seminal role in the changing pattern and evolution of the occupation and industrial uses of the local area and nearby suburbs, which included filling large areas of low lying land for development.

Aesthetically, intact original sections of the canal, comprising pitched dry packed ashlar sandstone, provides a textured and coloured finish which is aesthetically valuable in the cultural landscape. It is a major landmark and dramatic component of the industrial landscape of the area, particularly as viewed from the Ricketty Street Bridge and along Airport Drive.

Scientifically, the excavation of the canal provided a valuable contribution to the understanding of the changing sea-levels along the eastern seaboard and the antiquity of the aboriginal presence in the area. Intact original sections of the fascine dyke sandstone construction are rare examples of late 19th century coastal engineering works.

The area has been assessed as having no potential to contain historical archaeological material associated with the development or occupation of the area, either prior to or since the construction of the canal. As a result, the site would contain no material of historical significance, or material that could contribute to the significance of Alexandra Canal itself.¹⁶

However, the following assessment of significance for Criterion E – Research Potential has been extracted from the 2004 CMP for the Alexandra Canal:¹⁷

- *The canal bed may contain examples of extinct flora & fauna species. The discovery of the butchered Dugong, aboriginal axes, and the remains of an*

¹⁶ Heritage NSW, "Alexandra Canal," *State Heritage Inventory*, published 2001, <https://www.hms.heritage.nsw.gov.au/App/Item/View/Item?itemId=5053860>.

¹⁷ DPWS Heritage Design Services, *Alexandra Canal Conservation Management Plan*, 2005, p. 45.

ancient forest in this area, uncovered during construction which have revealed both a species and food source of Aboriginal occupation in the Botany Basin and a scientific understanding to the changing sea levels along the area

- *The canals 3.9 kms of open space with defined edges that form the banks is an important and unique design feature and contributes to the cultural landscape.*
- *The Canal was built for navigational purposes this feature is important in understanding its history, design and function.*
- *The Canal has been formed from a natural water course (Sheas Creek) which is still active as a drainage system and provides for an [estuarine] environment*

In addition, archaeological evidence of the Alexandra Canal is likely to include the original cuts or trenching for the canal itself, any associated infrastructure and earlier linings of the canal. The potential for such evidence is high. However, the research potential for this archaeological resource is limited, as these elements are known or well documented. This phase has no research potential, as there is no potential for such evidence to demonstrate information not readily available from other sites along the canal or from historical resources. This remains would not be relevant to general questions about human history, other substantive questions relating to Australian history or contribute to other major questions about 20th century industries in the Sydney area. The archaeological resource of the Alexandra Canal would not reach the threshold for local significance under the criterion of research potential.

5.4.2 Statement of significance: Warehouse “Rudders Bond Store” including interior

The following statement of significance for the “Rudders Bond Store” has been extracted from the SHI listing:

The site is of historical significance for its role in the production of engineered timber in Australia from approximately 1946 to 1958. The factory was built initially for Ralph Symonds and was later occupied by Rudders Bond Store. Symonds was a pioneering manufacturer of such timbers and the building contains a good example of the company’s work in the timber frame of the building. The building has strong associations with Ralph Symonds, a pioneer of laminated timber construction in the Post-War era in Sydney and Melbourne, who designed the laminated timber structure supporting the roof of the factory on this site.

This building is of State and possibly National significance as a surviving example of the laminated arches pioneered by Ralph Symonds. As a physical example of these structures the building has great research potential for studying this innovative building technology and to some extent the production processes. Surviving early laminated timber buildings are rare. Miles Lewis identified another early key building; the Burge Brothers Building in Melbourne. Also designed by Symonds in 1945, the Burge Brothers Building is the oldest surviving building of its type in Australia. The subject warehouse would be the second oldest surviving building with engineered timber trusses in Australia.

The site is significant for its role in the history of engineered timbers across

*Australia and is of state heritage significance for its historical, associative, aesthetic, technical, rare and representative values.*¹⁸

As part of NSW Governments WestConnex project, Rudder's Bond Store was demolished in early 2017.¹⁹

¹⁸ Heritage NSW, 'Warehouse "Rudders Bond Store" including interiors'. *State Heritage Inventory*, published 2016, <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=2420545> (23/09/2022).

¹⁹ Extent Heritage, *Rudders Bond Store/Former Symonds Factory: Preliminary Conservation Strategy*, accessed 2016. <https://www.westconnex.com.au/media/wcyiqymy/new-m5-rudders-bond-store-preliminary-conservation-strategy-august-2016.pdf>.

6.0 PROPOSED WORKS

6.1 Proposed works

The proposed flight training facility will enable pilots and flight crews from Qantas and other airlines to undertake periodic training and testing to meet regulatory requirements by simulating both aircraft and emergency procedural environments. The flight training centre will be situated within a three-storey industrial warehouse and will include:

- Flight simulator hall:
 - 8 x simulator bays – State of the art full motion flight simulators with visual fidelity, motion and sound. This allows crew to be trained in all aspects of normal and non-normal operations, including instrument approaches and landings in all weather conditions.
 - The proposed simulators will complement the flight training facilities in other states.
- Emergency procedures component including:
 - Cabin evacuation emergency trainer – Full-scale cabin mock-up is used as practical training device. These facilities allow emergency situations to be accurately portrayed and allow pilots and cabin crew to handle emergency situations in both wide and narrow-bodied aircraft.
 - Slide descent tower – Enables realistic training of deployment and use of slides to evacuate aircraft for pilots and cabin crew.
 - Door trainers – Enables realistic training of use of emergency exits to evacuate aircraft for pilots and cabin crew.
- Ancillary spaces (administration and training areas) including:
 - Equipment room – Storage of emergency equipment (oxygen tanks, defibrillators etc.) that supports the training and assessment of cabin crew and pilots of aviation medicine.
 - Pilots lounge – Area for pilots to wait prior to simulator sessions
 - Meeting rooms and lunch room.
 - Reception area.
 - Toilets, plant, loading dock.

In addition to the above scope, to facilitate the construction of the flight training facility, a new stormwater outlet and easement are proposed along the southwest boundary of the property which will have an impact on the fabric of the sandstone wall of Alexandra Canal. Two concrete stormwater outlets into Alexandra Canal already exist along the wall to serve 28 and 30 Burrows Road. Artefact has been advised by a civil engineer that:

“The existing drainage line and easement is proposed to be relocated to facilitate the construction of the new building. The existing easement is currently traversing across the middle of the proposed warehouse. The relocation will divert the drainage line around the proposed building, along the western (downstream) side of the property.

The relocation proposes a new discharge outlet to be constructed. The new drainage outlet is required to maintain a suitable pipe grade (greater than 0.3%).

Noting the additional length required to traverse around the building, if the existing discharge point were to be utilised this would result in a flatter unacceptable pipe grade (approximately 0.14%) and overall unacceptable hydraulic conditions.

To manage the construction of the proposed stormwater discharge point, reference should be made to the works detail on drawings CO14585.00-DA47. The pipe penetration will be constructed in a manner which maintains the heritage form of the channel and is similar to the many other existing pipe penetrations present along the Alexandra Canal.”

A selection of the relevant Architectural Plans prepared by CAE and LOGOS, dated 26 July and 20 September 2022 and received by Artefact Heritage in September 2022, are provided in Figure 67 to Figure 76).

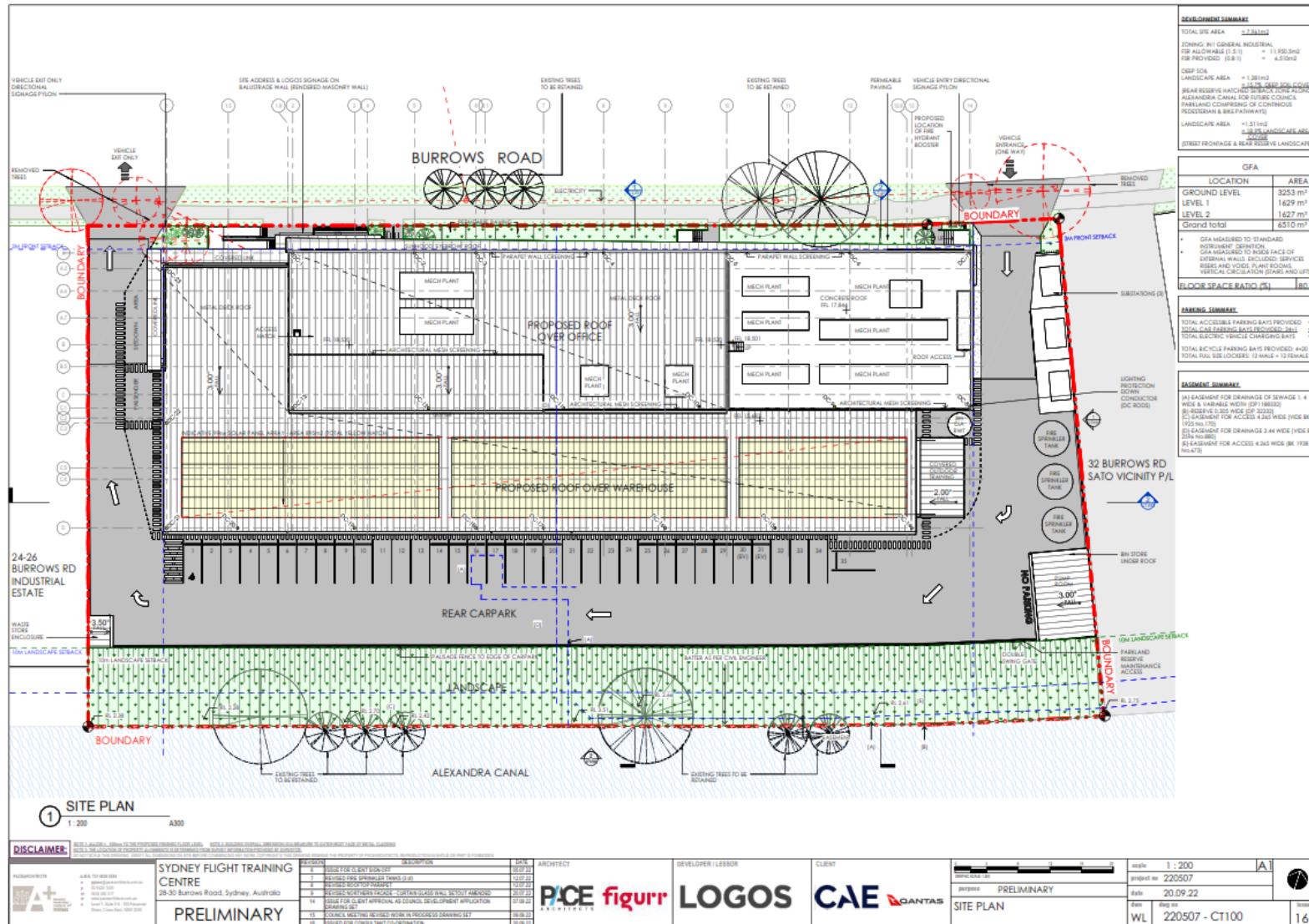


Figure 67. Site Plan of Sydney Flight Training Facility 28-30 Burrows Road. (Source: CAE and LOGOS, 2022)

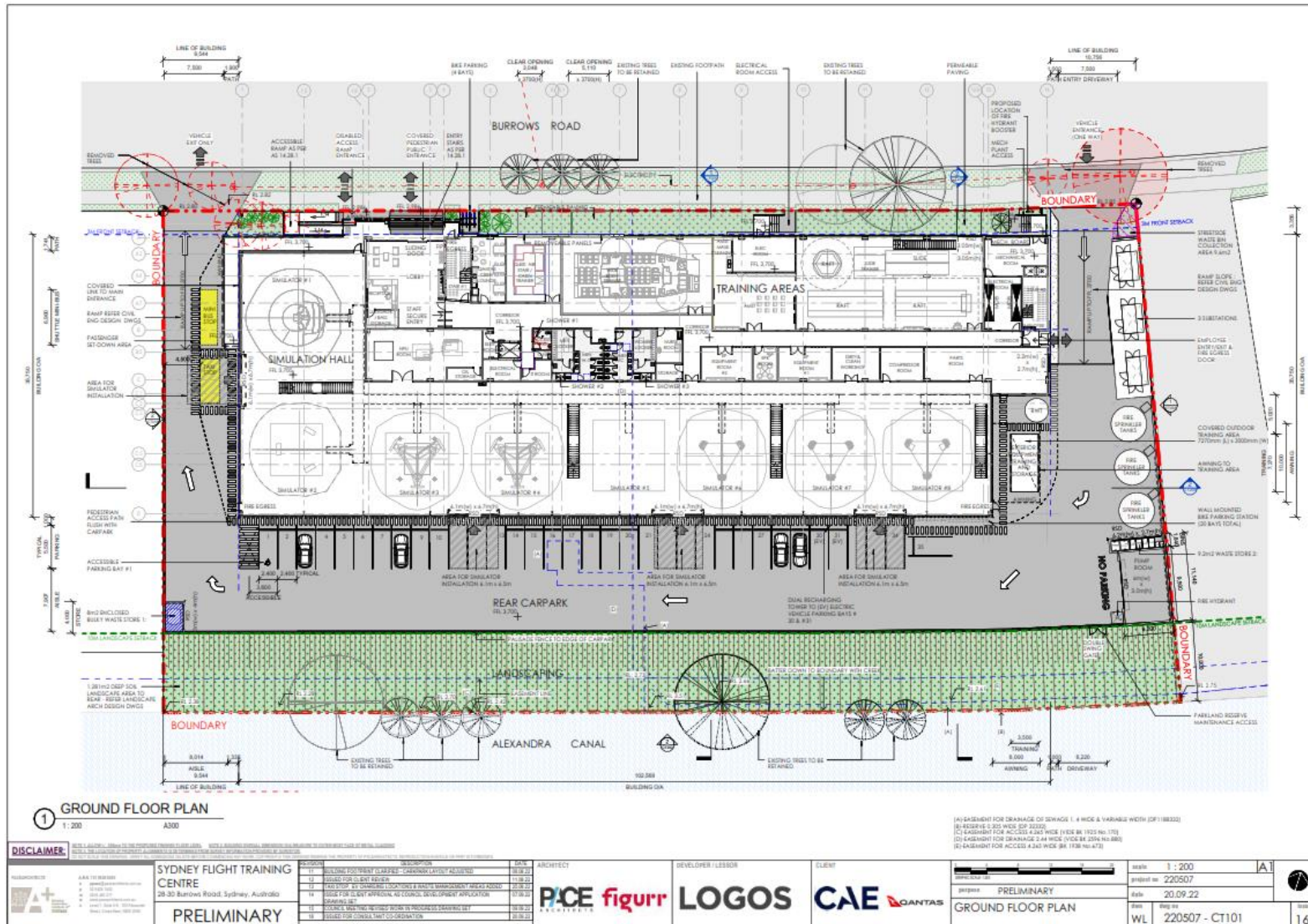


Figure 68. Ground Floor plan of Sydney Flight Training Facility 28-30 Burrows Road. (Source: CAE and LOGOS, 2022)

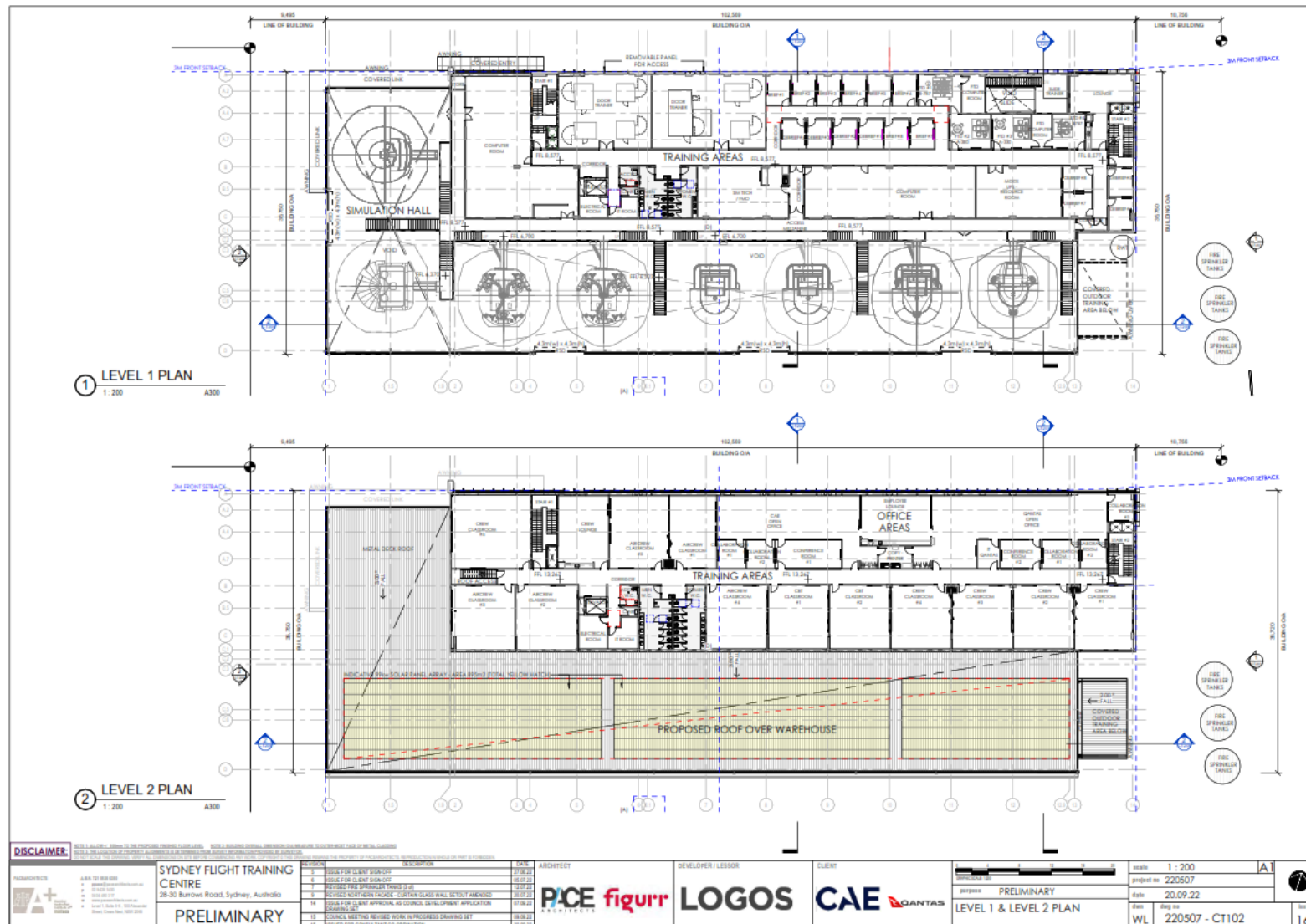


Figure 69. First and Second Floor plans of Sydney Flight Training Facility 28-30 Burrows Road. (Source: CAE and LOGOS, 2022)

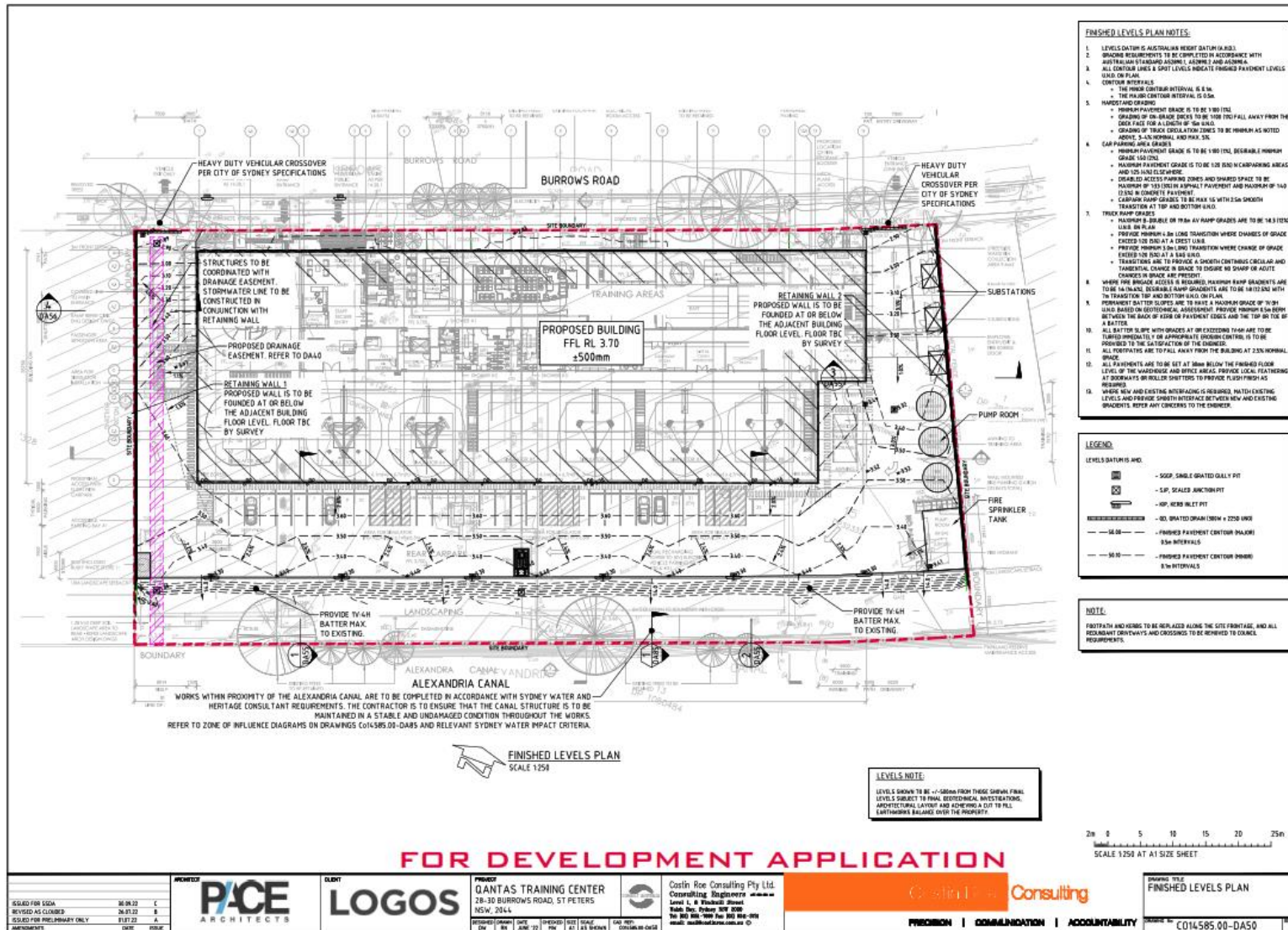


Figure 70. Finished Levels Plan (Source: LOGOS, 2022)

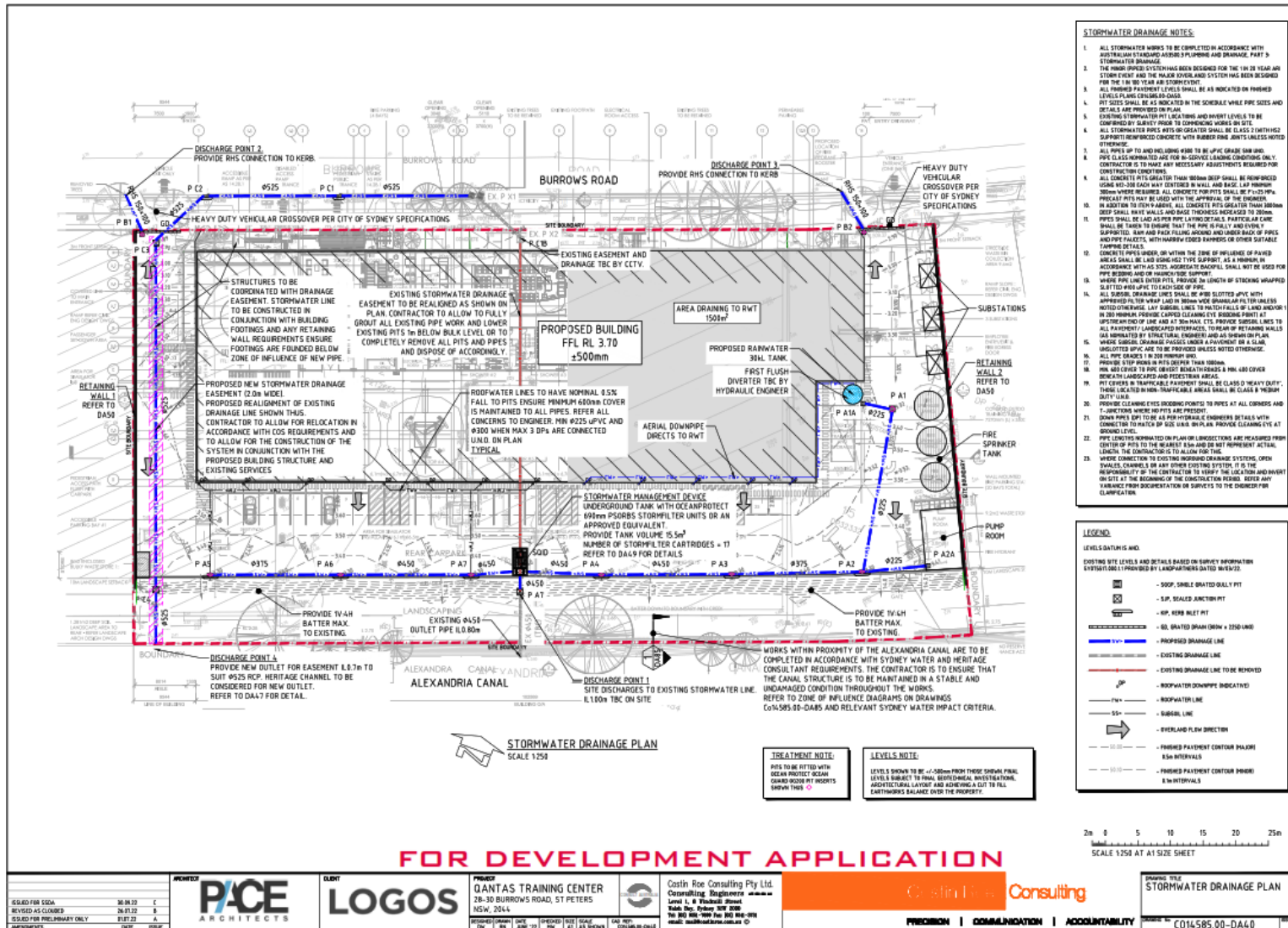


Figure 71. Stormwater Drainage Plan of Sydney Flight Training Facility 28-30 Burrows Road. (Source: CAE and LOGOS, 2022)

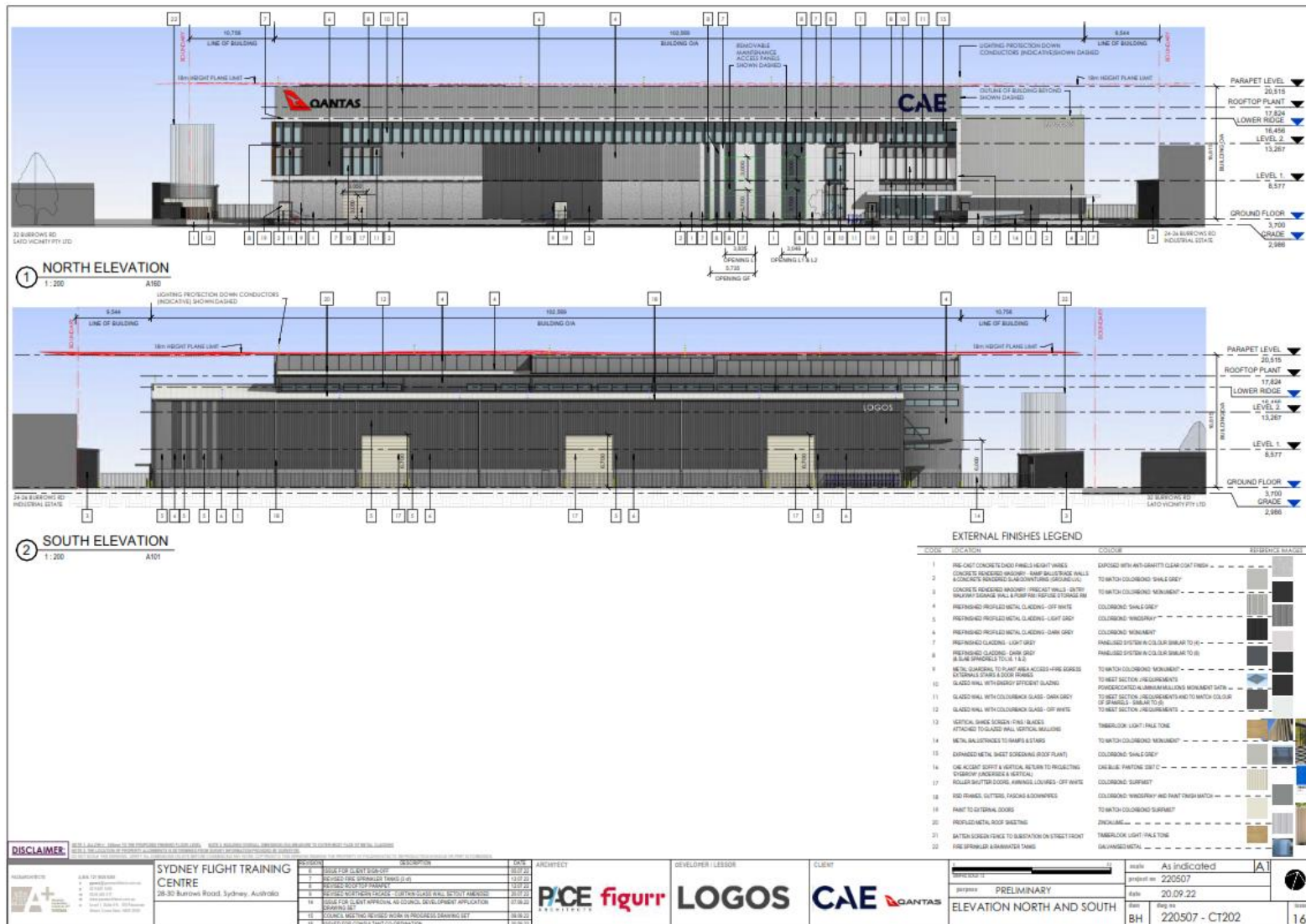


Figure 72. North and South Elevation of Sydney Flight Training Facility 28-30 Burrows Road. (Source: CAE and LOGOS, 2022)

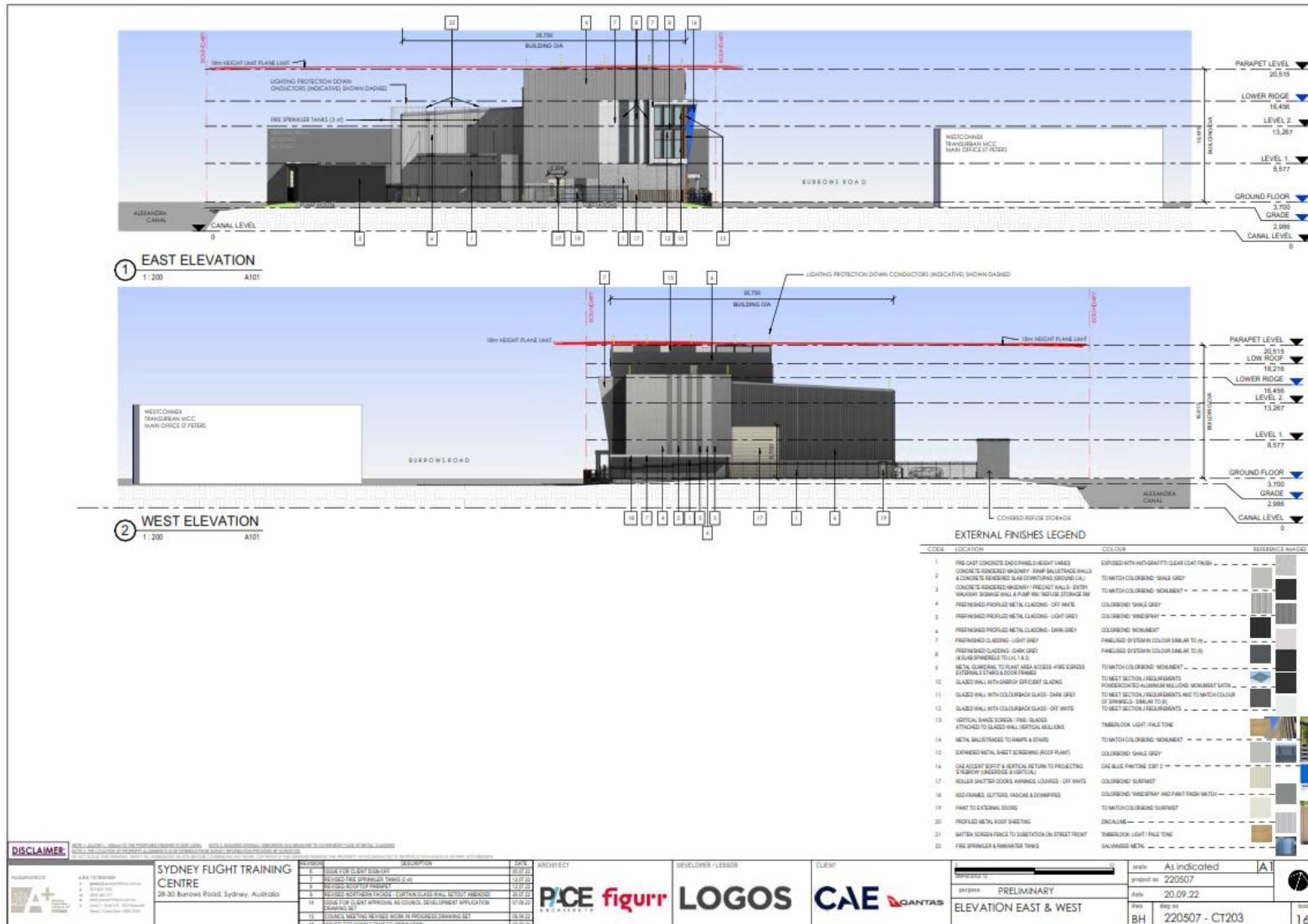


Figure 73. East and West Elevation of Sydney Flight Training Facility 28-30 Burrows Road. (Source: CAE and LOGOS, 2022)

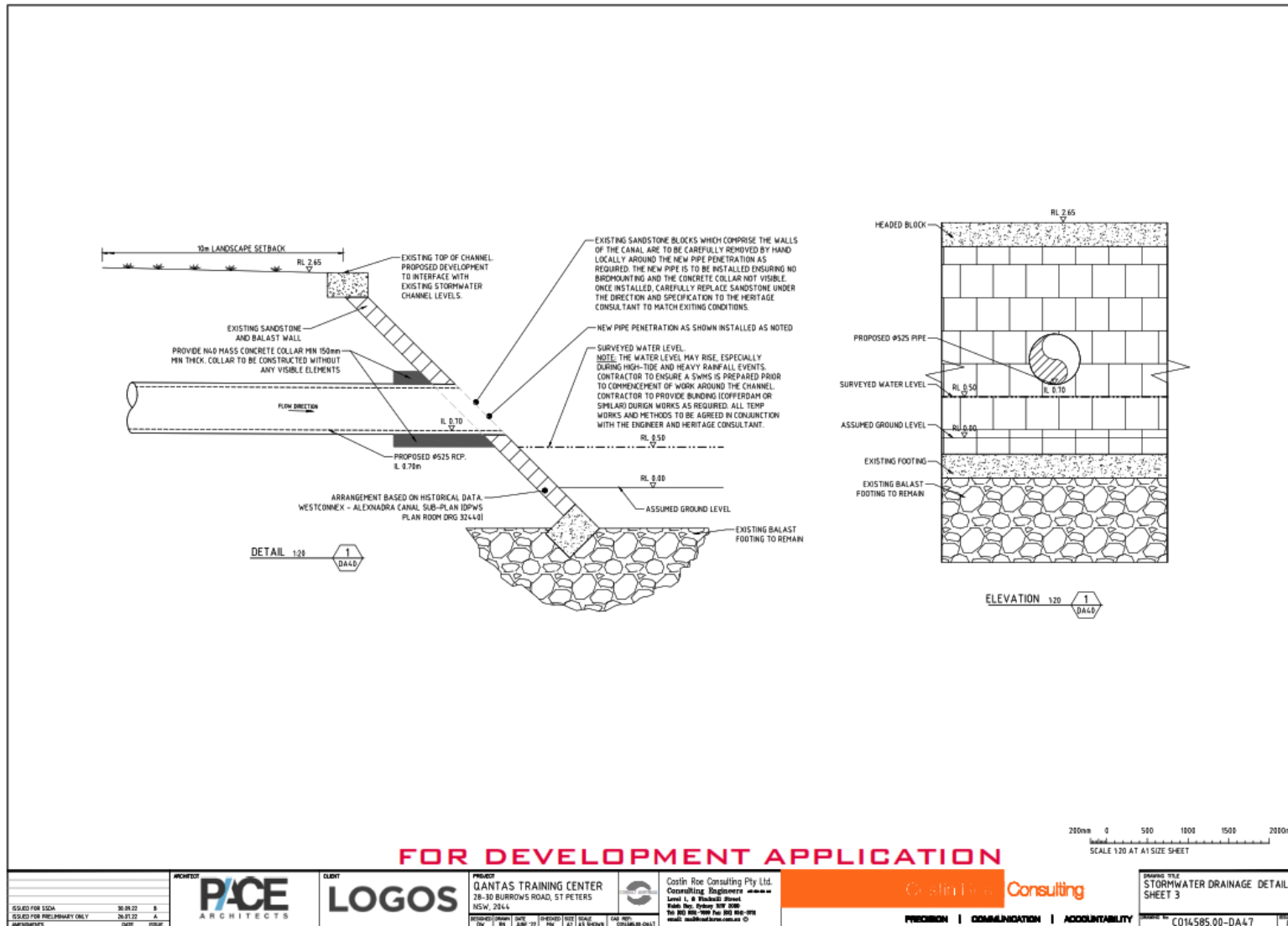


Figure 74. Section and Elevation of new stormwater outlet into Alexandra Canal, 28-30 Burrows Road. (Source: LOGOS, 2022)

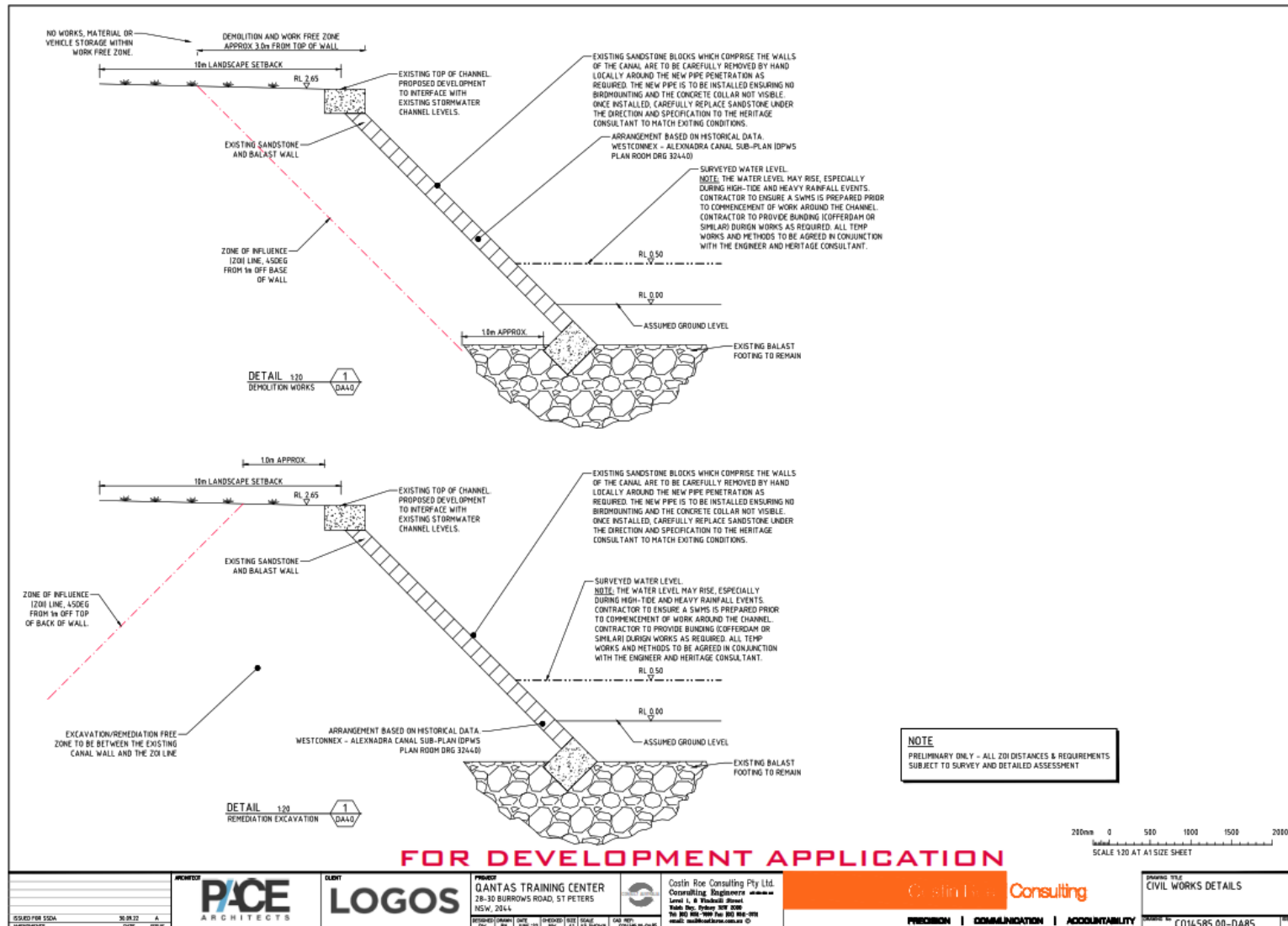


Figure 75. Section of Alexandra Canal Wall Civil Works Details (Source: LOGOS, 2022)

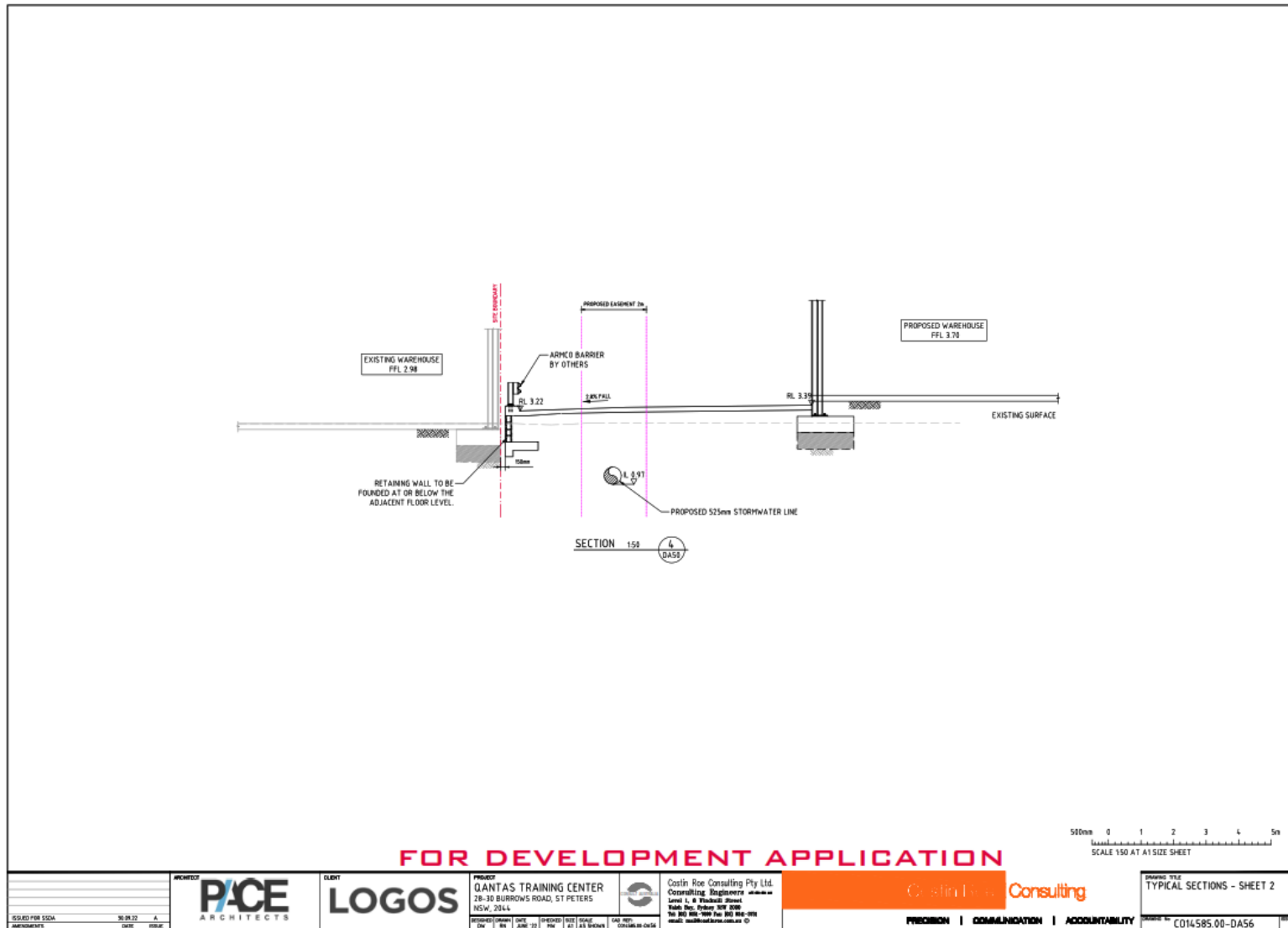


Figure 76. Typical section indicating level of new stormwater outlet (Source: LOGOS, 2022)

7.0 HERITAGE IMPACT ASSESSMENT

7.1 Introduction

This section assesses the heritage impact of the proposed works at the site on heritage values within the site. Justifications are also provided for the proposed works.

Within this approach, the objective of a heritage impact assessment is to evaluate and explain how the proposed works will affect the heritage value of the site and/or place. A heritage impact assessment should also address how the heritage value of the site/place can be conserved or maintained, or preferably enhanced by the proposed works.

In order to consistently identify the impact of the proposed works, the terminology contained in Table 7 and Table 8 has been referenced throughout this document. The terminology and definitions are based on those contained in guidelines produced by Australian ICOMOS and the Heritage Council of NSW.²⁰

Table 7: Terminology for assessing the magnitude of heritage impact.

Grading	Definition
Major adverse	Actions that would have a severe, long-term and possibly irreversible impact on a heritage item. Actions in this category would include partial or complete demolition of a heritage item or addition of new structures in its vicinity that destroy the visual setting of the item. These actions cannot be fully mitigated.
Moderate adverse	Actions that would have an adverse impact on a heritage item. Actions in this category would include removal of an important part of a heritage item's setting or temporary removal of significant elements or fabric. The impact of these actions could be reduced through appropriate mitigation measures.
Minor adverse	Actions that would have a minor adverse impact on a heritage item. This may be the result of the action affecting only a small part of the place or a distant/small part of the setting of a heritage place. The action may also be temporary and/or reversible.
Negligible	Actions that are so minor that the heritage impact is considered negligible.
Neutral	Actions that would have no heritage impact.
Minor positive	Actions that would bring a minor benefit to a heritage item, such as an improvement in the item's visual setting.
Moderate positive	Actions that would bring a moderate benefit to a heritage item, such as removal of intrusive elements or fabric or a substantial improvement to the item's visual setting.
Major positive	Actions that would bring a major benefit to a heritage item, such as reconstruction of significant fabric, removal of substantial intrusive elements/fabric or reinstatement of an item's visual setting or curtilage.

²⁰ Including the document ICOMOS, *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties*, January 2011; <https://www.environment.nsw.gov.au/resources/heritagebranch/heritage/material-threshold-policy.pdf>

Table 8: Terminology for heritage impact types

Impact	Definition
Direct	Impacts resulting from works located within the curtilage boundaries of the heritage item.
Potential direct	Impacts resulting from increased noise, vibrations and construction works located outside the curtilage boundaries of the heritage item.
Indirect	Impact to views, vistas and setting of the heritage item resulting from proposed works outside the curtilage boundaries of the heritage item.
Archaeological	Impacts to potential archaeological remains located within the curtilage boundaries of the heritage item.

7.2 Assessment of Heritage Impact

As 28-30 Burrows Road is not currently heritage listed and does not meet the criteria to warrant heritage listing, there are no potential direct or indirect impacts from the proposed development on the heritage value of the site.

7.2.1 Archaeological impacts

This section assesses the direct (physical) impacts of the proposed works on potential significant archaeological remains within the site itself.

7.2.1.1 Proposed excavation works

Proposed excavation required for the construction of the new stormwater outlet into the Canal wall are very likely to disturb the original cuts or trenching for the canal itself, backfilled deposits, any associated infrastructure, and earlier linings of the canal. The potential for such impacts is high.

However, elements of this type are well documented and there is limited potential for such evidence to demonstrate information not readily available from other sites along the canal or from historical resources. The potential archaeological resource has been assessed as not reaching the local significance threshold.

Therefore, the proposal is unlikely to impact on archaeological remains reaching the local significance threshold, and archaeological impacts are considered to be negligible.

7.3 Heritage impacts to nearby heritage items

As per section 2.7 (Table 2) there are two heritage items identified within 200 meters of 28-30 Burrows Road, St Peters.

This section assesses the potential direct (physical) and indirect (visual) impacts of the proposed works on heritage items within the site itself and its vicinity. The heritage impacts of the proposed works are outlined in

Table 9.

Table 9: Assessment of heritage impact.

Item Name	Item/Listing Number	Potential direct impacts	Potential indirect impacts
Alexandra Canal	SHR: I01621 Sydney LEP 2012: I3 Sydney Water s170: 4571712	The works associated with the construction of the new stormwater outlet in the Canal wall has been assessed as having moderate adverse physical impacts to the localised area of the Alexandra Canal sandstone wall. Due to the localised area of impact to the Canal wall fabric the overall impact on the entire Alexandra Canal would be considered minor adverse.	The works has been assessed as having moderate adverse indirect impacts on the localised area of the Alexandra Canal where the outlet works are proposed due to the removal of sandstone and the insertion of modern infrastructure. Due to the localised area of impact to the Canal wall fabric the overall impact on the entire Alexandra Canal would be considered minor adverse.
Rudders Bond Store	Sydney LEP: I1405	The works have been assessed as having nil direct impacts on the Store as it was demolished in early 2017.	The works have been assessed as having nil indirect impacts on the Store as it was demolished in early 2017.

7.4 Statement of heritage impact

A statement of heritage impact has been prepared according to NSW Heritage Office guidelines in Table 10 below.²¹

Table 10. Statement of Heritage Impact

Impact	Discussion
What aspects of the proposal respect or enhance the heritage significance of the site?	<ul style="list-style-type: none"> The main impact of the project will be on the installation of the stormwater outlet and the subsequent removal of sandstone. The proposal includes a caveat that qualified heritage specialist would be involved to ensure that the sandstone removed would be replaced in sympathetic manner, as such the work would be conducted in a respectful manner. The proposed works are not expected to result in adverse impact to significant archaeological remains. As the work requires the removal of historic fabric a Photographic Archival Recording shall be conducted in accordance with Policy 13 of the Alexandra Conservation Management Plan 2004.
What aspects of the proposal could have a detrimental impact on the heritage significance of the site?	<ul style="list-style-type: none"> The direct physical impact from the works required for the insertion of the stormwater outlet are related to the removal and modification of significant historic fabric of the wall which would have a moderate adverse impact on heritage item.

²¹ Heritage Office and Department of Urban Affairs and Planning, *Statements of Heritage Impact*, 2002.

Impact	Discussion
	<ul style="list-style-type: none">• The indirect physical impacts to the wall are related to the potential damaged that the wall could incur from vibrations during construction of the stormwater outlet.• The indirect visual impacts to the heritage item are related to the insertion of the new concrete outlet into the uninterrupted portion of the sandstone wall.• To mitigate detrimental effects to the aesthetic value of the wall, the collar of the stormwater pipe will not be protruding beyond the extent of the wall. In addition, the sandstone removed will be carefully replaced under the direction of a heritage consultant to match the existing wall.• To ensure the restoration of the sandstone is completed to a high standard the work should be conducted by a qualified tradesperson.
Have more sympathetic options been considered and discounted?	<ul style="list-style-type: none">• The existing stormwater drainage of the site has been evaluated by the civil engineer and has been found to be inadequate for the proposed development and therefore a new stormwater outlet is necessary.

7.5 Assessment against relevant policies

7.5.1 Alexandra Canal Conservation Management Plan, 2004

The proposed works should be in accordance with CMP policies for the Alexandra Canal prepared by Heritage Design Services in 2004. Policies relevant to this SoHI from the CMP are outlined in below.²²

²² DPWS Heritage Design Services, *Alexandra Canal Conservation Management Plan*, 2004.

Table 11: Alexandra Canal - Relevant Conservation Policies.

Policy	Detailed policy discussion and assessment of impacts against recommendations
<p>Policy 4 Using the CMP</p>	<p><i>Ensure all proposed works, including new works or works to retained items, are undertaken in a manner which recognises the cultural significance of the site and the NSW Government Heritage Asset Management Guidelines as part of the Total Asset Management Guideline</i></p>
<p>Response</p>	<p>All modifications to the Alexandra Canal, including its walls, banks, and potential Aboriginal and Non-Aboriginal archaeological remains should be carried out in a sympathetic manner.</p> <p>Where a culvert is to be installed within the Alexandra Canal, significant fabric would be avoided where possible and protected throughout the construction program. Where works to the highly significant sandstone banks are required for the installation of the culvert, the methodologies and mitigation strategies included in this SoHI should be followed.</p> <p>All works associated with the project would be guided by the NSW Government Heritage Asset Management Guidelines (2015) as part of the Total Asset Management Guideline.</p>
<p>Policy 13 Maintaining Records</p>	<p><i>Prepare appropriate archival records of the site prior to any major alterations or demolitions. This should include photographic and/or measured drawing recording of buildings, landscaping and site features.</i></p>
<p>Response</p>	<p>As the project will require major alterations to the Alexandra Canal, a Photographic Archival Recording (PAR) and reporting would be carried out in accordance with the NSW Heritage Office's <i>How to Prepare Archival Records of Heritage Items</i> (1998), and <i>Photographic Recording of Heritage Items Using Film or Digital Capture</i> (2006) prior to, and during (where feasible), the construction works.</p> <p>This will ensure the existing nature of the impacted area of the Alexandra Canal is recorded and would also provide a detailed understanding of its construction methods.</p>
<p>Policy 16 Funding</p>	<p><i>Any development within the curtilage of the Alexandra Canal should form partnerships to fund conservation works of the Canal and any other conservation works, within the curtilage, deemed appropriate to the Canal's significance.</i></p>
<p>Response</p>	<p>At present, the project does not include provisions for developing partnerships with appropriate agencies to fund conservation works (where appropriate) for the Alexandra Canal.</p> <p>It is recommended that such partnerships be considered during the detailed design, planning and development phase of the project.</p>
<p>Policy 19 Asset Management</p>	<p><i>Any development within the defined curtilage of the Canal should accordingly take responsibility for the conservation of the listed heritage items within that curtilage. Stabilisation of the Canal walls should be conducted ahead of any construction or redevelopment within the curtilage area. Responsibility for any conservation/ stabilisation work should fall equally with the SWC [Sydney Water Corporation] and the development proponent</i></p>
<p>Response</p>	<p>Refer to Policy 16.</p>
<p>Policy 28 Conservation Planning</p>	<p><i>Any development proposal within the site curtilage of the Alexandra Canal must also plan for the conservation of the canal. This includes programming restoration works with the development, stabilisation of the canal walls, reversal of intrusive fabric in the canal and responsibility for water treatment and water disposal in the canal.</i></p>

Policy	Detailed policy discussion and assessment of impacts against recommendations
Response	Refer to Policy 16.
Policy 29 Planning Controls	<i>Ensure that all proposed work to this site is assessed for heritage impacts against the policies of the CMP.</i>
Response	This SoHI has been prepared to assess heritage impacts against the policies of the CMP and therefore meets requirements under Policy 29.
Policy 30 Planning Controls	<i>Where heritage impacts fall outside the scope of policies in the CMP or the 'standard exemptions', ensure that all appropriate statutory processes are followed to obtain approval for proposed works. This includes applications under Section 57 of the Heritage Act and applications under local planning controls.</i>
Response	<p>The subject works are related to a State Significant Development approval under the Environmental Planning and Assessment Act 1979, which in accordance with this Act, the provisions and requirements of the Heritage Act 1977 do not apply.</p> <p>This SoHI has been prepared to assess heritage impacts in satisfaction of the SEARs outlined in Section 1.7.</p>
Policy 34 Works, Development Zones and New Structures	<i>Any new developments within the curtilage of the site should prepare a statement of heritage impact and outline all positive and negative impacts on the significance of the Alexandra Canal and any of the heritage items within the curtilage area associated with the canal. It must outline a strategy that protects the stability of the embankment walls.</i>
Response	This SoHI has been prepared to meet requirements under Policy 34.
Policy 36 Works, Development Zones and New Structures	<i>Any new development should be of a small enough scale so as to not overwhelm the existing landscape, in terms of form, scale or height.</i>
Response	<p>The scale of development on the subject site adjoining the Canal is consistent with the industrial nature of the land uses, both current and historic. The Canal is a key component of the industrial landscape and the length, width and mass of the artificial banks is an aspect of this industrial character.</p> <p>The establishment of one new drainage outlet will not overwhelm the existing nature of the Canal as the Canal is characterised by sandstone banks with frequent and regular penetrations and drainage outlets.</p> <p>Therefore, the project does meets requirements under Policy 36.</p>
Policy 37 Works, Development Zones and New Structures	<i>The open air space over the canal should be retained as far as possible and bridges over the canal should be restricted.</i>
Response	<p>The proposed addition of a new outlet to the canal and replacement of industrial buildings adjoining will not encroach on the open air space above the Canal, or impinge on the landscape surrounding the Canal.</p> <p>Therefore, the project meets requirements under Policy 37.</p>

Policy	Detailed policy discussion and assessment of impacts against recommendations
Policy 41 Works, Development Zones and New Structures	<i>All fabric of Exceptional, High and Moderate grading of significance shall be conserved to protect it at a State Significant level.</i>
Response	<p>All significant fabric associated with the Alexandra Canal would be avoided where possible in order to meet requirements under Policy 41. Where works to the highly significant sandstone banks are required for the installation of the culvert, the methodologies and mitigation strategies included in this SoHI should be followed.</p>
Policy 48 Vegetation Systems	<i>Future species consistent with the character of the region and the canal as well as indigenous vegetation should be established for the reaches of the canal.</i>
Response	<p>Detailed landscaping designs have not been prepared at this stage of the project. However, it is recommended that Policy 48 be considered during the detailed design and planning phase to ensure this condition is met.</p>
Policy 52 Vegetation Systems	<i>Plantings should consider the views and vistas from and to the canal and be consistent with such axis.</i>
Response	<p>Detailed landscaping designs have not been prepared at this stage of the project. However, it is recommended that Policy 52 be considered during the detailed design and planning phase to ensure this condition is met.</p>
Policy 58 Conservation of Fabric: Undertaking works	<i>Prepare specifications for works to the site using the CMP as a guiding document. Ensure specifications are prepared by a suitably qualified heritage professional.</i>
Response	<p>This SoHI has been prepared to provide recommendations that are in keeping with those outlined in the CMP.</p> <p>All conservation and construction works that may be required under the project would be carried out under appropriate heritage supervision and advice prepared/provided by a qualified heritage specialist/engineer.</p>
Policy 59 Undertaking works	<i>Ensure all works to the site are undertaken by skilled trades people with experience working on heritage sites.</i>
Response	<p>All conservation or construction works to the Alexandra Canal Walls would be carried out under the supervision of a heritage specialist and carried out by trades people qualified to work with heritage fabric.</p>
Policy 60 Undertaking works	<i>Ensure all environmental safeguards and approvals are undertaken prior to Conservation Works starting so that no damage is caused to the Alexandra Canal or curtilage. This must include requirements and impacts from the disturbance of contaminated sediments.</i>
Response	<p>In order to meet Policy 60 requirements, a Work Method Statement would be prepared prior to the commencement of conservations works within the Alexandra Canal curtilage or to its significant fabric.</p>
Policy 61 Undertaking works	<i>Continue to minimise silt and refuse intake into the catchment area of the Alexandra Canal and the Canal itself.</i>

Policy	Detailed policy discussion and assessment of impacts against recommendations
Response	In order to meet Policy 61 requirements, consideration should be given to reducing the amount of waste water or refuse entering the canal during the planning and design process for the project.
Policy 62 Undertaking works	<i>Undertake a program of recovering and storing any dislodged sandstone for future conservation works on the Canal.</i>
Response	In order to meet Policy 62 requirements, a program would be designed to ensure that all original masonry removed during the establishment of the drainage outlet be recovered and stored for future conservation works on the Canal.
Policy 67 Undertaking works	<i>No new structures should be constructed which rely on the Canal embankment walls for structural support</i>
Response	The project does not require the construction of new structures that would rely on the canal embankment walls for structural support.
Policy 68 Undertaking works	<i>All new pipes entering Alexandra Canal will follow the Engineering guidelines set down in "Strategic Bank Stabilisation Plan for Alexandra Canal" DPWS 2002. All existing pipes entering Alexandra Canal that are causing damage to the Gauged Bond Ashlar should be replaced so that they will follow the Engineering</i>
Response	The project requires the installation of one new drainage outlet to enter the canal. It is therefore recommended that in order to meet Policy 68, the Strategic Bank Stabilisation Plan for Alexandra Canal prepared by DPWS in 2002 be followed.
Policy 70 Archaeology	<i>Recognise the potential presence and significance of archaeological remains within the site.</i>
Response	This SoHI contains a Non-Aboriginal archaeological assessment which concludes that the subject site is unlikely to provide any significant archaeological evidence and as such the recommended management measure would be the preparation of an Unexpected Finds Procedure.
Policy 73 Archaeology	<i>Should artifact [sic] deposits be unexpectedly discovered during any unsupervised ground disturbance, cease work until the discovery can be assessed by a qualified historical or Aboriginal archaeologist. If necessary, make application under the Heritage Act to continue with excavation works in the area(s) of discovery.</i>
Response	This SoHI includes a requirement for the Roads and Maritime Unexpected Items Procedure (2015) to be implemented and followed for the duration of the construction program.
Policy 74 Archaeology	<i>Use artifact [sic] collections recovered during archaeological works to improve the understanding and interpretation of the site.</i>
Response	<p>The CMP includes a recommendation that appropriate heritage interpretation be provided for the Alexandra Canal in accordance with the <i>NSW Heritage Manual</i>, the <i>NSW Heritage Office's Interpreting Heritage Places and Items: Guidelines</i> (August 2005), and the <i>NSW Heritage Council's Heritage Interpretation Policy</i>.</p> <p>This would include provisions for any archaeological artefacts, materials or features recovered during archaeological management of the project to be incorporated in the heritage interpretation of the Canal.</p>

Policy	Detailed policy discussion and assessment of impacts against recommendations
Policy 75 Services	<i>Locate new services in existing access trenches and conduits, to minimise disturbance of the landscape.</i>
Response	In order to meet requirements under Policy 75, it is recommended that areas of previous disturbance are considered where excavation is required. This would also include avoiding any potential intact archaeological remains or ground surfaces.
Policy 76 Services	<i>New penetrations to the Canal should be kept to an absolute minimum and should be reviewed by a suitably qualified heritage professional and follow the Engineering guidelines included in "Strategic Bank Stabilisation Plan for Alexandra Canal" DPWS 2002.</i>
Response	<p>In order to meet requirements under Policy 76, consideration has been given to using the existing drainage outlets within the subject site, however the project's civil engineer has determined that these are not adequate.</p> <p>Designs for these outlets would be prepared in consultation with a qualified heritage engineer or architect and follow guidelines outlined in the <i>Strategic Bank Stabilisation Plan for Alexandra Canal</i> (2002). Where works to the highly significant sandstone banks are required for the installation of the culvert, the methodologies and mitigation strategies included in this SoHI should be followed.</p>
Policy 82 Recording and Interpreting Cultural Significance	<i>Photographically record the site and Canal before, during and after any major changes and use this record in the site's interpretation. Place copies of this record with the Botany, South Sydney and Marrickville Library Local Studies Collection.</i>
Response	<p>As the project will require limited alterations to the Alexandra Canal, this SoHI has recommended a PAR be carried out in accordance with the NSW Heritage Office's <i>How to Prepare Archival Records of Heritage Items</i> (1998), and <i>Photographic Recording of Heritage Items Using Film or Digital Capture</i> (2006) prior to, and during (where feasible), the construction works.</p> <p>In order to meet requirement under Policy 82 this would be submitted in electronic format to the Bayside, Inner west and Sydney Council library's Local Studies Collection.</p>
Policy 86 Recording and Interpreting Cultural Significance	<i>Integrate the interpretation of this site with the interpretation of the surrounding area.</i>
Response	<p>The CMP includes a recommendation that appropriate heritage interpretation be provided for the Alexandra Canal in accordance with the <i>NSW Heritage Manual</i>, the <i>NSW Heritage Office's Interpreting Heritage Places and Items: Guidelines</i> (August 2005), and the <i>NSW Heritage Council's Heritage Interpretation Policy</i>.</p> <p>In order to meet requirements under Policy 86, artefacts and Photographic Archival Records arising from the project works should be incorporated in the heritage interpretation of the Alexandra Canal.</p>

8.0 CONCLUSIONS AND RECOMMENDATIONS

8.1 Conclusion

The heritage assessment of 28-30 Burrows Road established that the property itself was not heritage listed on a statutory or a non-statutory basis and did not possess qualities to warrant listing. However the site is in proximity to two heritage listed items:

- Alexandra Canal (SHR: I01621; Sydney LEP 2012: I3; Sydney Water s170: 4571712)
- Rudders Bond Store (Sydney LEP 2012: I1405)

The proposed works include the demolition of the existing warehouses at 28 and 30 Burrows Road to facilitate the construction of the three storey industrial warehouse which will include a flight simulator hall, emergency procedure training facilities and ancillary administrative spaces. In order to enable the construction of the warehouse, the existing easement has to be re routed to the western boundary of the property and a new stormwater outlet has to be constructed as the existing stormwater outlets would be insufficient. Based on the drawings issued for the flight training facility issued on 26 July and 20 September 2022, the proposed works would have the following heritage impacts:

- The proposed development at 28-30 Burrows Road will have no direct or indirect impacts on the heritage value of the site, as it is not currently heritage listed and does not meet the criteria to warrant heritage listing,
- The installation of the stormwater outlet into the sandstone canal wall of Alexandra Canal would result in moderate direct (physical) impacts and moderate indirect (visual) impacts to the localised area of the works, incurred by the removal and potential damage to the historic fabric. Due to the localised area of impact to the Canal wall fabric the overall impact on the entire Alexandra Canal would be considered minor adverse direct and indirect impacts.

The recommendations identified below will assist mitigating the impact to the Alexandra Canal.

8.2 Heritage approval pathway

The project has been approved as SSD 47601708 under s4.36 (3) of the EP&A Act and as such is subject to SEARs pertaining to the preparation of an EIS. In the preparation of this Statement of Heritage Impact the heritage conditions established in the SEARs have been satisfied.

This SoHI has been prepared in satisfaction with the requirements of City of Sydney and Heritage NSW.

8.3 Recommendations

8.3.1 General Recommendations

The following management guidelines should be followed for all aspects of the proposed works:

- The works have been designed to minimise and avoid impacts on original and highly significant fabric. However, works that require impacts to original fabric should be 'made good' once works are complete, in accordance with the guidelines, *How to Carry Out Work on Heritage Buildings & Sites* (NSW Heritage Office 2002). This could include:

- Reinstating/replacing fabric with identical materials;
- Where internal surfaces are to be made good after works, care should be taken to ensure that modern materials and finishes that match existing are used for repair work; and
- Repair should generally match the original element but should be identifiable as new work.
- Where the works could impact original and highly significant heritage fabric, only tradespersons with experience in working with heritage materials should undertake works;
- The methods, tools and materials used should not cause inadvertent damage to original and highly significant heritage fabric within the study areas. Should unexpected damage to significant historic fabric occur, the advice of a heritage specialist should be sought before repairs are made;
- All works are to be undertaken in accordance with the principles and objectives of the Australia ICOMOS *Charter for the Conservation of Places of Cultural Significance* (the *Burra Charter*);
- Where options exist for alternative installation methodologies and materials, that achieve the desired functional outcome, preference should be given to the option that has the least deleterious impact on significant heritage fabric.
- A Photographic Archival Recording (PAR) report should be prepared for the site to document significant fabric and heritage significant views and vistas that would be impacted in accordance with the Alexandra Canal Conservation management Plan Policy 13, 82 and 86. This report should be prepared in accordance with relevant guidelines issues by Heritage NSW.
- A heritage induction for all contractors undertaking the works is required. This heritage induction must be prepared and delivered by a qualified heritage specialist and ensure that all contractors are aware of the nearby heritage listings and understand the heritage significance of said listings, as well as areas to avoid and steps to take if any unexpected damage occurs during works.
- If any artefacts are found during the construction process, they should be incorporated into the interpretation strategy for the entirety of Alexandra Canal in accordance with Policy 86 of the Alexandra Canal CMP.

8.3.2 Protection of Heritage Fabric During Works

The following recommendations and mitigation measures are provided to minimise potential direct impact to original and highly significant fabric of the subject sites:

- Works to original and highly significant fabric should be reversible where possible;
- A suitably qualified heritage consultant should provide management guidelines for the protection of the original features that could potentially be impacted by the works, or are in the vicinity of the works.
- Pursuant to Policy 50 of the Alexandra Canal CMP, all the works on the site must be carried out by skilled tradespeople who have experience working with heritage fabric.

- In accordance with Policy 62 of the Alexandra Canal CMP, where surplus sandstone is dislodged from the wall, it should be salvaged and stored for future conservation works on the Canal.

The following recommendations and mitigation measures are provided in order to minimise potential indirect impact to the heritage items in the vicinity:

- If any inadvertent damage occurs to original and highly significant fabric within and in the vicinity of the study area due to the proposed works, the damage must be reported immediately to the Project Manager and the relevant Heritage Specialists. Damage is to be made good in accordance with specialist heritage advice.

8.3.3 Archaeology

The following recommendations and mitigation measures are provided in order to minimise potential direct impact to the archaeological remains:

- The implementation of an Unexpected Finds Procedure is required for this project in accordance with Policy 70 of the Alexandra Canal CMP, which would involve stop works procedure in the case any unexpected heritage finds occur. A heritage specialist must be contacted immediately to address the unexpected find and determine next steps.
- In conjunction with the above, should significant historical archaeological 'relics,' or other significant remains not predicted by this SoHI, be identified during excavation, there may be a requirement to notify Heritage NSW under section 146 of the *Heritage Act*. Additional archaeological reporting and management, including consultation with Heritage NSW, may be required prior to works being able to proceed.

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