

HERITAGE IMPACT STATEMENT

BUMBORA POINT, PORT BOTANY NSW

5 JULY 2018
SH1324
PREPARED FOR SOUTHERN METROPOLITAN CEMETERIES TRUST

URBIS

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

Director	Stephen Davies, B Arts Dip Ed, Dip T&CP, Dip Cons Studies, M.ICOMOS		
Senior Heritage Consultant	Ashleigh Persian, B Property Economics		
Project Code	SH1324		
Report Number	01	29.06.2018	Draft
	02	05.07.2018	Final

TABLE OF CONTENTS

Executive Summary	i
1. Introduction	1
1.1. Background	1
1.2. Site Location and Current Heritage Context	1
1.3. Methodology	1
1.4. Author Identification	2
1.5. Heritage Listing	2
2. Site Description	3
3. Proposal	7
3.1. Planning Proposal Overview	7
3.2. Intended Development Outcome	7
3.2.1. Concept Landscape Masterplan	7
3.2.2. Public Benefit	8
4. Historical Overview	10
4.1. The Subject Site	10
4.2. The Bunnerong Power Station	14
5. Heritage Significance	16
5.1. What is Heritage Significance?	16
5.2. Significance Assessment	16
5.3. Statement of Significance – Subject Site	20
5.4. Established Significance of the Botany Bay National Park Heritage Conservation Area	20
5.5. Aboriginal Cultural Heritage	22
6. Impact Assessment	24
6.1. Statutory Controls	24
6.1.1. Local Environmental Plan	24
6.1.2. Development Control Plan	27
7. Conclusion and Recommendations	28
8. Bibliography and References	31
8.1. Bibliography	31
8.2. References	31
Disclaimer	32

FIGURES:

Figure 1 – Locality map with subject site shown outlined in red	1
Figure 2 – Extract of Randwick Council heritage map (subject site outlined in blue)	2
Figure 3 – Botany Parish Map undated (but showing early grants and government reserves)	10
Figure 4 – Botany Parish Map undated (but showing early grants and government reserves)	10
Figure 5 – Botany Bay Parish Map c. 1867	11
Figure 6 – Botany Parish Map 1886, showing the subject site as ‘Bumborah Point’, a Battery Reserve, and the adjoining dedicated cemetery.	11
Figure 7 – Botany Parish Map 1905	12
Figure 8 - Aerial view looking North East over power station on northern shore of Botany Bay with Eastern Suburbs Crematorium and Botany Cemetery on right c.1940s	12
Figure 9 – Extract of the 1943 historical aerial of the subject site, showing the Bunnerong Power Plant and indicating the inlet tunnel (subject site) and outlet tunnel further to the north	13
Figure 10 – Extract of the 1943 historical aerial of the subject site (outlined in red)	13

Figure 11 – Close up extract of the 1943 historical aerial of the subject site showing the former inlet tunnel	14
Figure 12 - Bunnerong Power House, Matraville, New South Wales, ca. 1930	14
Figure 13 – Demolition of Bunnerong Power Station, June 1987	15

PICTURES:

Picture 1 – View looking east with the subject site on the left	4
Picture 2 – View looking north towards the subject site	4
Picture 3 – View looking south towards the subject site from within the Eastern Suburbs Memorial Park	5
Picture 4 – View looking east with the subject site on the left	5
Picture 5 – View looking west from within the subject site	5
Picture 6 – View within the subject site of undulating topography and vegetation	5
Picture 7 – View of remnant concrete blocks within the subject site	5
Picture 8 – View within the subject site of vegetation	5
Picture 9 – View looking north from the waterside, looking at the now blocked tunnel mouth	6
Picture 10 – View looking south-west towards the remaining concrete funnel arm	6
Picture 11 – View looking south onto the former tunnel opening structure, from above	6
Picture 12 – View looking south onto the former tunnel opening structure, from above	6

TABLES:

Table 1 – Assessment of heritage significance	16
Table 2 – Established Significance of the Botany Bay National Park Heritage Conservation Area	20
Table 3 – Local Environmental Plan	24
Table 4 – Development Control Plan	27

EXECUTIVE SUMMARY

Urbis has been engaged by the Southern Metropolitan Cemeteries Trust to prepare the following heritage impact statement for the subject site. This heritage impact statement has been prepared to accompany a Planning Proposal for the subject site. The Planning Proposal seeks to include “cemetery” as an additional permitted use on the site to facilitate the expansion of the Eastern Suburbs Memorial Park (ESMP) which is located directly adjacent to the site to the north east. Further detail of the Planning Proposal is included at Section 3 of this report.

The subject site is located within the *C5 Botany Bay National Park (Botany Bay National Park, La Perouse Headland, Yarra Bay and Frenchmans Bay) Heritage Conservation Area (HCA)*, a conservation area of local significance, and state heritage significance in parts. The subject site also adjoins two listed heritage items, being;

- Item 245: Yarra Bay Beach and Reserve – local heritage significance; and,
- Item 246: Chinese Market Gardens – state heritage significance.

The heritage significance assessment included at Section 5 has concluded that the subject site has historical and associative heritage value associated with its use in providing infrastructure for the former Bunnerong Power Station, which was located to the north at the present-day site of Botany Road. The Bunnerong Power Station was the second power station developed in Sydney to provide electricity to the city, and operated between 1925 and the 1970s. There are remnant sections of this tunnel extant within the subject site (exposed and underground), which are the only physical remains of the Bunnerong Power Station visible today.

The Planning Proposal has been assessed in detail at Section 6, with regard to its potential heritage impact on the vicinity heritage items and the *C5 Botany Bay National Park (Botany Bay National Park, La Perouse Headland, Yarra Bay and Frenchmans Bay) HCA*. Notwithstanding that there are no built works proposed as part of this proposal, our heritage impact assessment has had regard to the Concept Masterplan included at Section 3.2.1, as an indication of the future works which would be facilitated by this Planning Proposal.

Overall, the Planning Proposal is considered to be acceptable, and will not result in a future use or development that would detrimentally affect the significance of the subject site, vicinity heritage items or conservation areas, for the following reasons:

- The portion of the site to be dedicated to a lawn cemetery extension will be centrally located on the knoll of the site, whilst the southern periphery of the site bordering the foreshore will be retained as natural shrubbery. The retention of a 20-metre vegetated ‘buffer zone’ of natural shrubbery along the foreshore will enable the site to retain its connection with the broader Botany Bay National Park Heritage Conservation Area, and also allow it to be read and understood as part of the natural foreshore landscape. The natural topography of the site will also block views to the lawn cemetery when viewed from the foreshore.
- The subject site will still be read, when viewed from the foreshore, as a connecting portion of the Botany Bay National Park Heritage Conservation Area, and the provision of natural shrubbery along the southern periphery of the subject site maintains the continuation of the ‘natural’ National Park flora along the whole extent of Yarra Bay.
- While this future development will change the current shrubbery vegetation of the site, it would enable the site to be maintained as a landscaped property with grass, trees and shrubs being located to appropriately respond to the site’s coastal location and topography. The Concept Masterplan included herein identifies that the intent of the future lawn cemetery is to provide small patches of lawn burials, lined with avenues and clusters of existing and new trees. Footpaths and limited roads would meander through the site.
- The design of any future cemetery expansion on the site would take the form of a contemporary ‘lawn cemetery’, and as such, large headstones and monuments would not be permitted throughout the site, and restricted only to a small portion of burials adjoining the existing cemetery. Instead of monuments throughout the subject site, plaques would be placed on graves which would be maintained as grassed and landscaped rows.

- Burials would be standard double-depth graves. The Concept Masterplan included herein shows that future burials would avoid the significant underground infrastructure associated with the former Bunnerong Power Station, as well as typical underground services and infrastructure, by only occurring outside of areas under which this infrastructure lies. Therefore, future development of a cemetery that would be facilitated by this Planning Proposal, will not have any adverse impacts or physical intervention into, the significant tunnel infrastructure of the former Bunnerong Power Station.
- The foreshore running south along Yarra Bay from the subject site is also a listed heritage item of local significance. The significance of this item is its natural National Park character, and as discussed above, the subject site will still be able to contribute to the significance of this item through the retention of foreshore shrubbery. The subject site is located within vicinity to the state-significant Chinese Market Gardens heritage item. There will be no physical or visual impact on either of these vicinity heritage items as a result of future development facilitated by this Planning Proposal.
- There are no proposed changes to the statutory heritage listings for the Botany Bay National Park Heritage Conservation Area or the vicinity heritage items as part of this Planning Proposal.

Overall the Planning Proposal is considered to be acceptable with regard to its potential heritage impact. Notwithstanding that new cemetery-related development would be permissible within the subject site (which forms part of the Botany Bay National Park Heritage Conservation Area), it will be a low-scale passive use without built structures, appropriately landscaped and screened from the significant foreshore. This form of future development will not impact on the contribution of the subject site to the natural bushland character of the Botany Bay National Park Heritage Conservation Area.

The Planning Proposal is therefore supported from a heritage perspective and recommended for approval.

1. INTRODUCTION

1.1. BACKGROUND

Urbis has been engaged by the Southern Metropolitan Cemeteries Trust to prepare the following heritage impact statement for the subject site. This heritage impact statement has been prepared to accompany a Planning Proposal for the subject site. The Planning Proposal seeks to include “cemetery” as an additional permitted use on the site to facilitate the expansion of the Eastern Suburbs Memorial Park (ESMP) which is located directly adjacent to the site to the north east.

The subject site is located within the “C5 Botany Bay National Park (Botany Bay National Park, La Perouse Headland, Yarra Bay and Frenchmans Bay) Heritage Conservation Area” (HCA), a conservation area of local and state heritage significance. The subject site also adjoins two listed heritage items, being;

- Item 245: Yarra Bay Beach and Reserve – local heritage significance; and,
- Item 246: Chinese Market Gardens – state heritage significance.

Accordingly, a heritage impact statement is required to assess the potential impact of the proposal on the significance of proximate heritage items and conservation areas.

1.2. SITE LOCATION AND CURRENT HERITAGE CONTEXT

The site is located at Bumbora Point Port Botany, adjacent to the reclaimed Port Botany wharf to the west and the Eastern Suburbs Memorial Park to the east (Figure 1).

Figure 1 – Locality map with subject site shown outlined in red



Source: SIX Maps, 2018

1.3. METHODOLOGY

This Heritage assessment has been prepared in accordance with the NSW Heritage Division guidelines ‘Assessing Heritage Significance’. The philosophy and process adopted is that guided by the *Australia ICOMOS Burra Charter* 1999 (revised 2013). Site constraints and opportunities have been considered with reference to relevant controls and provisions contained within the Randwick Local Environmental Plan 2012 and the Randwick Comprehensive Development Control Plan 2013.

This report makes no assessment or recommendations with regard to the archaeological potential or Aboriginal cultural heritage of the site.

1.4. AUTHOR IDENTIFICATION

The following report has been prepared by Ashleigh Persian (Senior Heritage Consultant). Unless otherwise stated, all drawings, illustrations and photographs are the work of Urbis.

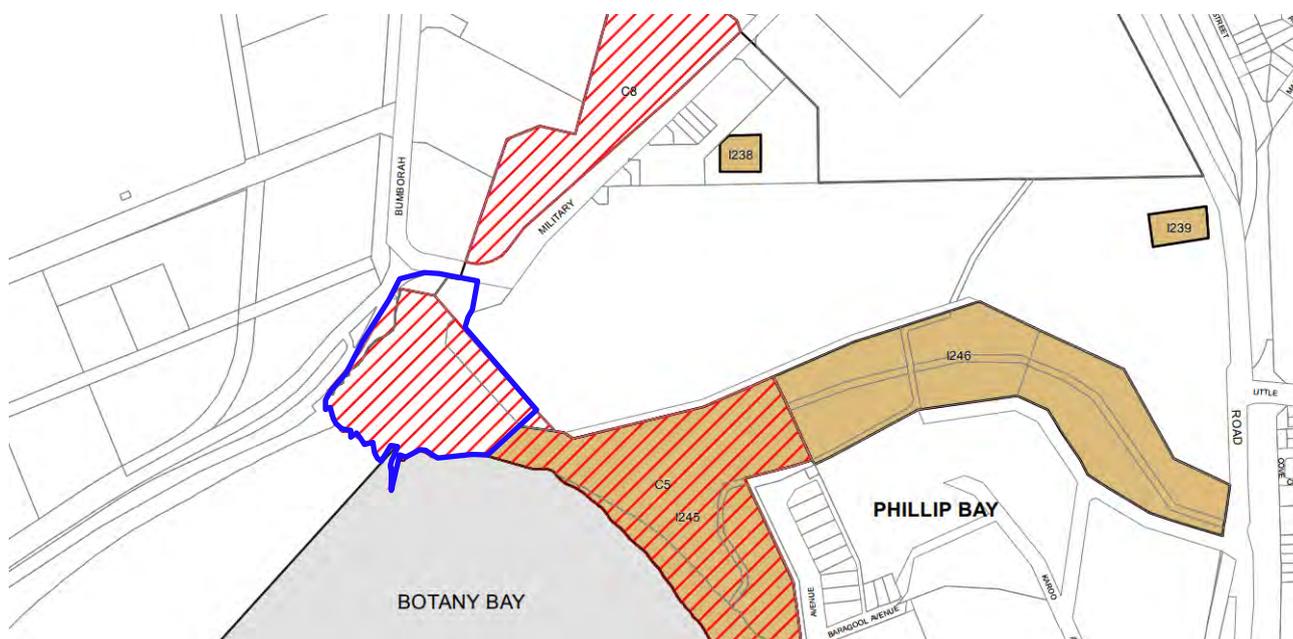
1.5. HERITAGE LISTING

The subject site is located within the “C5 Botany Bay National Park (Botany Bay National Park, La Perouse Headland, Yarra Bay and Frenchmans Bay) Heritage Conservation Area” (HCA), a conservation area of local significance, and state heritage significance in parts. The subject site also adjoins two listed heritage items, being;

- Item 245: Yarra Bay Beach and Reserve – local heritage significance; and,
- Item 246: Chinese Market Gardens – state heritage significance.

Extracts of the relevant heritage map is included below.

Figure 2 – Extract of Randwick Council heritage map (subject site outlined in blue)



Source: Randwick LEP 2012, Heritage Map HER_004

2. SITE DESCRIPTION

The site is known as Bumbora Point and is located at Bumborah Point Road, Port Botany. The site is legally described as Lot 4858 in DP 752015, part of Lot 7302 in DP 1139143 and part of the Military Road Reserve (unknown Lot and DP). The site is located within the Randwick Local Government Area, within the eastern suburbs of the Sydney Metropolitan Area. The site is located approximately 12 kilometres by direct line from the Sydney Central Business District (CBD).

Figure 3 – Location map



Source: Urbis

The subject site is a generally undeveloped and vegetated area of the Botany Bay foreshore. The original topography and promontory form of the subject site was degraded and obscured through the creation of the Port Botany wharves with land reclamation in the 1970s. The subject site now provides a physical link between the Eastern Suburbs Memorial Park to the north, and the Port Botany wharves to the west.

Vehicular and pedestrian access is provided from Military Road. An existing driveway provides access to a small carpark with 20 car spaces and bitumen path leading to Yarra Beach. The majority of the site is currently inaccessible due to thick vegetation and the poor condition of informal dirt tracks.

There are no built structures on the site, however there are a number of concrete blocks and remnant building materials. The site is generally vegetated by low density shrubs and grasses.

Along the southern periphery of the site is the Botany Bay foreshore, with a sandy beach and sandstone cliffs. A former tunnel opening is located on the southern side of the site, opening to the bay. The mouth of the tunnel has been backfilled with concrete and sandstone to block physical access. Concrete reinforcement has been constructed around the mouth of the opening in the sandstone bedrock, and there are remnant concrete arms extending south into the water to funnel water. Evidence of the tunnel infrastructure is also evident in the grooves of the sandstone within the water.

Aerial Image of the site (subject site outlined in blue)



Source: Urbis



Picture 1 – View looking east with the subject site on the left

Source: Urbis



Picture 2 – View looking north towards the subject site

Source: Urbis



Picture 3 – View looking south towards the subject site from within the Eastern Suburbs Memorial Park

Source: Urbis



Picture 4 – View looking east with the subject site on the left

Source: Urbis



Picture 5 – View looking west from within the subject site

Source: Urbis



Picture 6 – View within the subject site of undulating topography and vegetation

Source: Urbis



Picture 7 – View of remnant concrete blocks within the subject site

Source: Urbis



Picture 8 – View within the subject site of vegetation

Source: Urbis



Picture 9 – View looking north from the waterside, looking at the now blocked tunnel mouth

Source: Urbis



Picture 10 – View looking south-west towards the remaining concrete funnel arm

Source: Urbis



Picture 11 – View looking south onto the former tunnel opening structure, from above

Source: Urbis



Picture 12 – View looking south onto the former tunnel opening structure, from above

Source: Urbis

3. PROPOSAL

3.1. PLANNING PROPOSAL OVERVIEW

This heritage impact statement has been prepared to accompany a Planning Proposal for the subject site. The Planning Proposal seeks to include “cemetery” as an additional permitted use on the site to facilitate the expansion of the Eastern Suburbs Memorial Park (ESMP) which is located directly adjacent to the site to the north east.

This additional use will extend the active burial years of the cemetery by facilitating the creation of approximately 3,000 additional full body burial plots in addition to space for ash interments, and facilitate in meeting the demand for additional burial space across the Eastern City District by increasing the capacity of the ESMP.

The future development of the site for a cemetery will provide a logical expansion to the existing facilities of the ESMP whilst ensuring the harmonious relationship between the site itself and the waterfront.

3.2. INTENDED DEVELOPMENT OUTCOME

3.2.1. Concept Landscape Masterplan

A Concept Landscape Masterplan has been prepared for the site by Matthew Higginson Landscape Architecture, which provides an indication of the scale and form of development which would be facilitated by this Planning Proposal. The key elements of the concept Landscape Masterplan are described overleaf and an extract of the Concept Landscape Masterplan is included hereunder.

Figure 4 - Concept Landscape Masterplan (with insert showing the proposed 20-metre buffer zone)



Source: Matthew Higginson Landscape Architecture, 2018 CP101 Issue A(2)

01 : A PARKLAND CEMETERY

As an extension to ESMP, the site is to be developed as a predominantly lawn burial facility. This approach is appropriate in providing a parkland setting to transition the Yarra Bay foreshore with the monumental graves of the existing cemetery and completing the open space infrastructure that extends to the east.

02 : MONUMENT INTERFACE

The provision of monumental burial plots at the interface with the existing cemetery will provide an integrated transition to the new extension area.

03 : LANDSCAPED COLUMBARIA

Contemporary ash interment is to be provided within the fabric of the landform, utilising retaining structure as opportunity for memorialisation embraced in the landscape.

04 : ABORIGINAL CEMETERY & MEMORIAL GARDENS

A defined and protected area of 125 plots to be allocated to the La Perouse LALC and consecrated as Aboriginal Cemetery.

05 : A COMMUNITY FORESHORE

The Bumbora Point foreshore is to remain a public accessible open space. A shared zone promenade is to be established behind the sea-wall at the western end that provides a gateway to the foreshore zone.

06 : FORESHORE WALK

Proposed as a boardwalk skirting the interface between vegetated coastal slopes and the sandstone beachhead, the walk provides secure access to the beach and links with regional coastal walkways to the east.

07 : A SENSE OF PLACE

Interpretive media celebrating the areas rich history is to be incorporated through the site, with a landmark destination proposed on the foreshore as a central point to contemplate and appreciate the site and its context.

08 : FORESHORE VEGETATION ZONE

The natural vegetation of the foreshore slopes is characteristic of the landscape setting and is to be retained and enhanced.

09 : PARKING

The existing car park off Military Road is to be retained and upgraded to improve access and circulation. The existing car park on Prince of Wales Drive will continue as a public facility for accessing the foreshore.

10 : LINKS TO REGIONAL RECREATION NETWORK

Cycleway / shared path is to be provided through the site linking to with existing routes adjoining the site.

11 : AN INTEGRATED FACILITY

The site is to be developed as an integrated extension of the Eastern Suburbs Memorial Park. Internal road and footpaths are to link with the existing cemetery at the north-east boundary, with clear visual connections through an incidental canopy line transitioning from the parkland setting to the traditional monumental graves.

12 : LANDSCAPE BUFFER

In creating a desirable landscape amenity for the site, existing trees along Prince of Wales Drive are to be enhanced to create a vegetated buffer to the Port Botany Terminals.

3.2.1.1. Burial Space and Landscape Character

The Concept Landscape Masterplan has been designed to accommodate approximately 3,000 additional full body burial plots in addition to space for ash interments. Bumbora Point would be designed as a lawn cemetery. Lawn cemetery design is considered best-practice contemporary cemetery design across Australia and often serves a dual purpose as publicly accessible open space. Lawn cemetery design and includes the following key landscape characteristics:

- The landscape is predominantly lawn and resembles parklands;
- The landscape includes pathways and can be enjoyed for passive recreational purposes;
- Burial plots are provided in rows within a manicured lawn area; and
- Memorials and plaques are commonly uniform in design and generally lay flush to the lawn with minimal protrusion above ground level.

The visual and landscape characters of a lawn cemetery significantly differ from Victorian era cemetery design. Victorian era cemetery design is exhibited in older sections of most existing cemeteries and is characterised by large monuments and above ground concrete and stone graves coverings. The Concept Landscape Masterplan also includes wall niches for ash interments which are integrated into the topography of the site.

3.2.1.2. Site Access and Parking

As indicated in Concept Landscape Masterplan, the future development of the site could include an access driveway and onsite parking in the northern portion of the site. The Concept Landscape Masterplan includes a one-way loop road through the site and a road connecting to the existing ESMP road network. The concept road and path network will provide convenient access to burial areas. Vehicular access will be provided from Military Road.

3.2.1.3. Foreshore Access

The future development of the site will improve access to Yarra Beach and the Yarra Beach Foreshore. The site is currently highly vegetated and does not provide any formal or safe pedestrian access to the beach. The future development of the site will include a foreshore promenade and beach access along the southern boundary of the site accessed from Prince of Wales Drive. The Concept Landscape Masterplan includes a boardwalk to the beach and a viewing platform accessed from the foreshore promenade. The provisions of footpaths through the site from Military Road will also provide a north-south connection to Yarra Beach for public use.

3.2.2. Public Benefit

The future development of the site for a cemetery will deliver significant public benefit, including the following:

- **Additional burial space** – The provision of approximately 3,000 additional burial plots, in addition to space for ash interments will facilitate in meeting the demand for burial space in the Eastern City District.
- **Aboriginal Cemetery and Memorial Garden** – The proposal will include a dedicated Aboriginal Cemetery and Memorial Garden which will include 125 burial plots for the interment of the remains of

Aboriginal persons who are members or are associated with the La Perouse Local Aboriginal Land Council.

- **Creation of publicly accessible open space** – The future development of the site will increase the functionality and useability of the RE1 zoned land for passive recreational activities. At present, the site is unusable for recreational uses. The site is highly vegetated and does not include any safe or clear access paths, lighting or usable space.
- **Public access** – The future use of the site for a lawn cemetery and associated access networks will significantly improve public access and the safety of access to Yarra Beach and foreshore.

4. HISTORICAL OVERVIEW

4.1. THE SUBJECT SITE

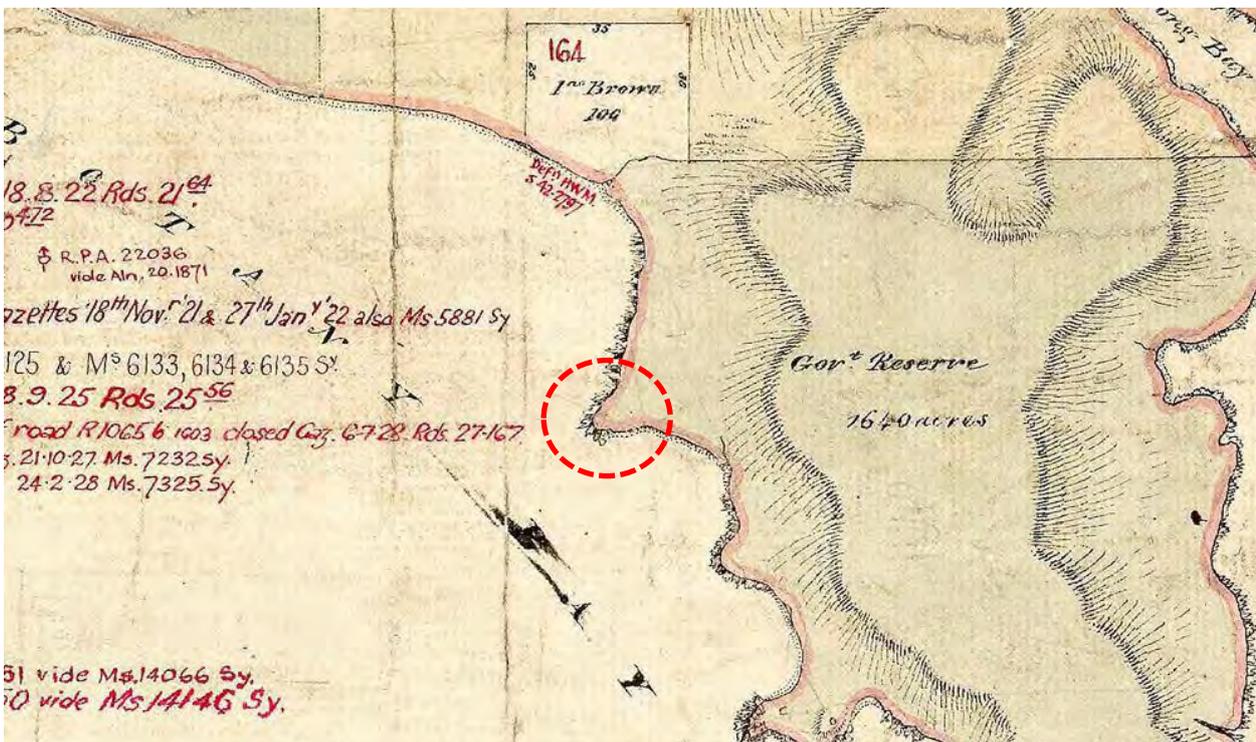
In the nineteenth century, the subject site remained as a rocky outcrop within Botany Bay, and completely undeveloped.

Figure 5 – Botany Parish Map undated (but showing early grants and government reserves)



Source: NSW Land Registry Services

Figure 6 – Botany Parish Map undated (but showing early grants and government reserves)



Source: NSW Land Registry Services

Figure 7 – Botany Bay Parish Map c. 1867



Source NSW Land Registry Services

By 1886, the subject site was identified as being a 'battery reserve', and was identified as 'Bumborah Point', a different spelling to the present name of 'Bumbora Point'. Around this time, the adjoining Eastern Suburbs Memorial Park (cemetery) was established, with the land being dedicated in 1888, and the first interment occurring in 1893.¹

Figure 8 – Botany Parish Map 1886, showing the subject site as 'Bumborah Point', a Battery Reserve, and the adjoining dedicated cemetery.

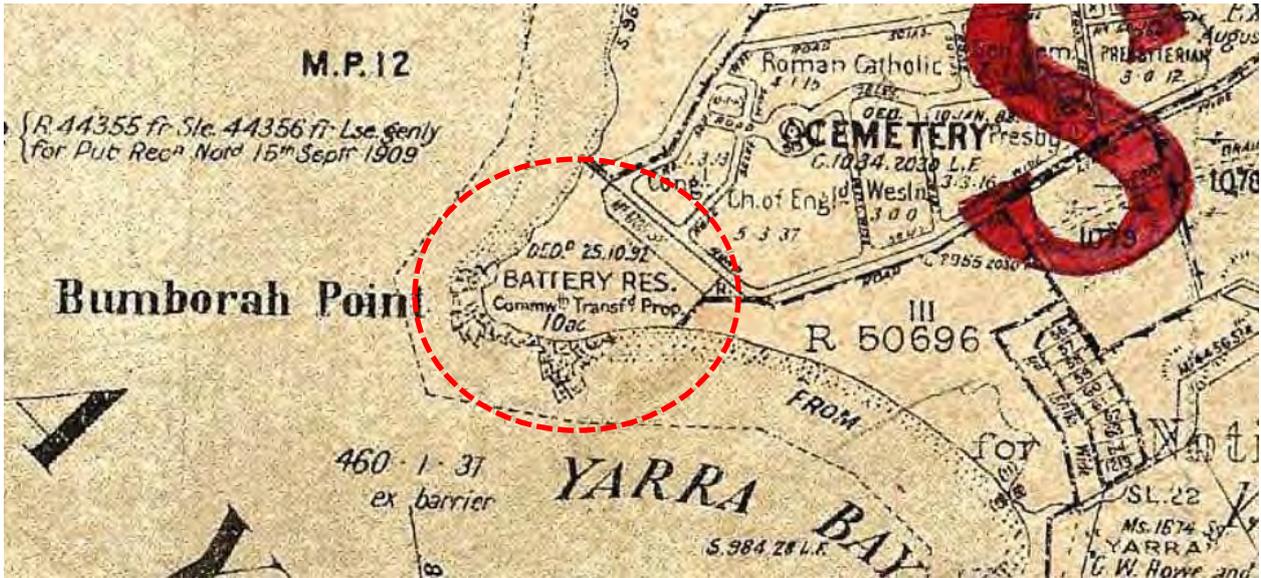


Source: NSW Land Registry Services

Development around the subject site and cemetery contributed to expand in the early twentieth century, primarily to the east of the subject site.

¹ Eastern Suburbs Memorial Pak website, Our History page, accessed 13 April 2018 at <https://easternsuburbsmemorialpark.worldsecurerest.com/our-history>

Figure 9 – Botany Parish Map 1905

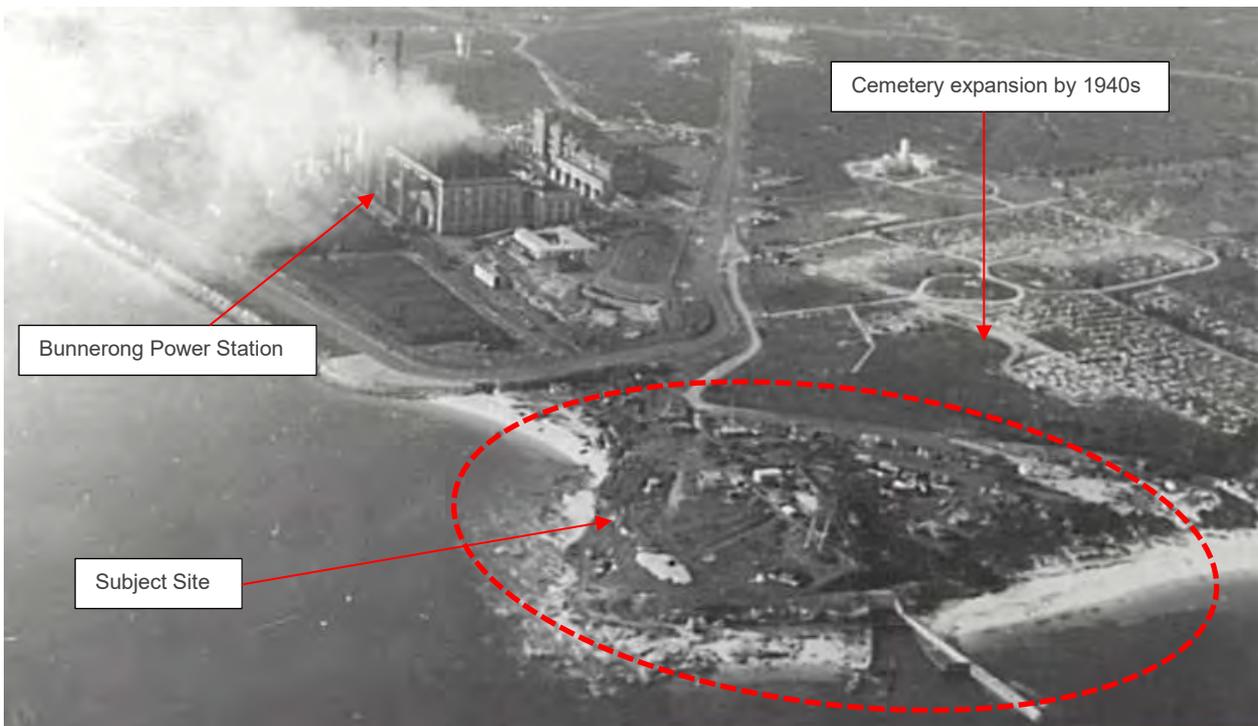


Source: NSW Land Registry Services

Between 1925 and 1929, the Bunnerong Power Station was constructed to the north west of the subject site. The Power Station required a supply of water for cooling of the condensers, and the location of the inlet tunnel for water sourcing was to be located within the subject site. A tunnel inlet, with associated concrete funnelling infrastructure, was constructed to the southern face of the shoreline of the subject site. Water entered the underground tunnel at the subject site, passed through the Power Station to the north, and then proceeded to dispel back into Botany Bay via an outlet tunnel to the north-west.

The infrastructure for the inlet tunnel comprised of two concrete arms extending south from a man-made tunnel in the rockface of the subject site. A concrete retaining wall formed the opening for the tunnel. A large area of sand was removed to allow for the water to enter the tunnel.

Figure 10 - Aerial view looking North East over power station on northern shore of Botany Bay with Eastern Suburbs Crematorium and Botany Cemetery on right c.1940s



Source: City of Sydney Archive Pix 036/036967

Figure 11 – Extract of the 1943 historical aerial of the subject site, showing the Bunnerong Power Plant and indicating the inlet tunnel (subject site) and outlet tunnel further to the north



Source: SIX Maps 2018

Figure 12 – Extract of the 1943 historical aerial of the subject site (outlined in red)



Source: SIX Maps 2018

Figure 13 – Close up extract of the 1943 historical aerial of the subject site showing the former inlet tunnel



Source: SIX Maps 2018

After the inlet tunnel was decommissioned with the closure of the Power Station, the opening was infilled and large boulders and the concrete arms have degraded over time.

4.2. THE BUNNERONG POWER STATION

The Bunnerong Power Station site was originally part of the Bunnerong Estate, a 13-acre estate containing a large sandstone house built in 1825 by John Neathway Brown.

The site was chosen for the Bunnerong Power Station in 1924, and was constructed between 1925 and 1929 to the design of Henry Eli White. The power station was commissioned by the then Sydney Municipal Council and was the second station after Pyrmont to be built by the Sydney Municipal Council. The station produced electricity by burning coal and the station's cooling system used sea water from Port Botany funnelled through tunnels from the Bay.

Figure 14 - Bunnerong Power House, Matraville, New South Wales, ca. 1930



Source: <http://nla.gov.au/nla.obj-162108670>

The demise of the Bunnerong was primarily brought about by the introduction of new, larger power stations at Lake Macquarie in the 1950s. These stations were built closer to the sources of coal and could produce as much as five times the amount of energy as Bunnerong. Additionally, residents increasingly complained

about the pollution and noise generated by the station. Bunnerong was used as a stand by for emergency use only from the 1950's up until its closure in 1973.

Demolition of the power plant began in 1979 with major demolition following in 1986-1987, including the stations 112-metre concrete chimney stack. The presence of asbestos in the building and criticism made in Randwick Council meetings of the storage of dangerous chemicals on the power station site delayed demolition during 1987. In March 1994, the five-storey Bunnerong Switching Station or sub-station was also demolished.²

The former tunnel located underneath the subject site with its mouth opening to the Bay, previously formed part of the Bunnerong Power Station's infrastructure. The tunnel was used to draw in water from the Bay and used the tide. The water was used for cooling of the condensers at the Power Station. The position of the tunnels were chosen partly to get the inlet tunnel mouth into a rock bed, and partly because it was desirable to have the inlet away from the outlet, by which the residual warm water from the condensers was released back into the bay.³

In 2002 the Australian Customs Service lodged a DA with planning NSW for the construction of a container examination facility on the site.

Figure 15 – Demolition of Bunnerong Power Station, June 1987



Source: Randwick City Library Object no. H00/H00084d

² Randwick City Council, archived website from 4 April 2012, accessed 12 April 2018 at: https://web.archive.org/web/20120404120636/http://www.randwick.nsw.gov.au/About_Randwick/Heritage/A_to_Z_of_people_and_places/Bunnerong_Power_Station/indexdl_103.aspx

³ Building Vol. 41 No. 258 (12 February 1929) p. 37, <http://nla.gov.au/nla.obj-346819525>

5. HERITAGE SIGNIFICANCE

5.1. WHAT IS HERITAGE SIGNIFICANCE?

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

5.2. SIGNIFICANCE ASSESSMENT

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

Table 1 – Assessment of heritage significance

Criteria	Significance Assessment
<p>A – Historical Significance</p> <p><i>An item is important in the course or pattern of the local area's cultural or natural history.</i></p>	<p>The Bunnerong Power Station was commissioned by the Sydney Municipal Council and was the second power station to be constructed after Pyrmont.</p> <p>The subject site remnant tunnel opening (albeit infilled) and associated concrete funnelling arms (although located outside of the subject site boundary in the water) are the only remaining physical evidence of this power station and use of this area for electricity supply to Sydney in the early twentieth century.</p> <p>The subject site is considered to have historical significance for its physical evidence demonstrating this important historical infrastructure and provision of electrical supply to Sydney.</p>
<p><u>Guidelines for Inclusion</u></p> <ul style="list-style-type: none"> • shows evidence of a significant human activity <input checked="" type="checkbox"/> • is associated with a significant activity or historical phase <input checked="" type="checkbox"/> • maintains or shows the continuity of a historical process or activity <input type="checkbox"/> 	<p><u>Guidelines for Exclusion</u></p> <ul style="list-style-type: none"> • has incidental or unsubstantiated connections with historically important activities or processes <input type="checkbox"/> • provides evidence of activities or processes that are of dubious historical importance <input type="checkbox"/> • has been so altered that it can no longer provide evidence of a particular association <input type="checkbox"/>

Criteria	Significance Assessment
<p>B – Associative Significance</p> <p><i>An item has strong or special associations with the life or works of a person, or group of persons, of importance in the local area's cultural or natural history.</i></p>	<p>The Bunnerong Power Station was designed by prominent architect Henry Eli White, who specialised in both hydro infrastructure design, and elaborate theatre design. Henry Eli White is best known for his theatre work including the Sydney State Theatre (1929) and the Sydney Capitol Theatre (1927). His well-known industrial infrastructure projects are limited to a tunnel on the Waipori River hydro-electric scheme (in New Zealand), and the Bunnerong Power Station.</p> <p>The subject site and its subterranean tunnel infrastructure, has significance for its association with Henry Eli White, who not only designed the Bunnerong Power Station, but also specialised in hydro infrastructure including tunnels.</p>
<p><u>Guidelines for Inclusion</u></p> <ul style="list-style-type: none"> • shows evidence of a significant human occupation <input type="checkbox"/> • is associated with a significant event, person, or group of persons <input checked="" type="checkbox"/> 	<p><u>Guidelines for Exclusion</u></p> <ul style="list-style-type: none"> • has incidental or unsubstantiated connections with historically important people or events <input type="checkbox"/> • provides evidence of people or events that are of dubious historical importance <input type="checkbox"/> • has been so altered that it can no longer provide evidence of a particular association <input type="checkbox"/>
<p>C – Aesthetic Significance</p> <p><i>An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the local area.</i></p>	<p>The subject site is a generally vacant and vegetated area of land. The remnant tunnel infrastructure and opening within the site are examples of industrial infrastructure comprising rough concrete and steel construction. Whilst the tunnel opening remnant fabric is distinctive in its contrast to its natural environs, it is not of any particular aesthetic distinction or significance.</p>
<p><u>Guidelines for Inclusion</u></p> <ul style="list-style-type: none"> • shows or is associated with, creative or technical innovation or achievement <input type="checkbox"/> • is the inspiration for a creative or technical innovation or achievement <input type="checkbox"/> • is aesthetically distinctive <input type="checkbox"/> • has landmark qualities <input type="checkbox"/> • exemplifies a particular taste, style or technology <input type="checkbox"/> 	<p><u>Guidelines for Exclusion</u></p> <ul style="list-style-type: none"> • is not a major work by an important designer or artist <input type="checkbox"/> • has lost its design or technical integrity <input type="checkbox"/> • its positive visual or sensory appeal or landmark and scenic qualities have been more than temporarily degraded <input type="checkbox"/> • has only a loose association with a creative or technical achievement <input checked="" type="checkbox"/>

Criteria	Significance Assessment
<p>D – Social Significance</p> <p><i>An item has strong or special association with a particular community or cultural group in the local area for social, cultural or spiritual reasons.</i></p> <p><u>Guidelines for Inclusion</u></p> <ul style="list-style-type: none"> • is important for its associations with an identifiable group <input type="checkbox"/> • is important to a community's sense of place <input type="checkbox"/> 	<p>The subject site and its remnant tunnel infrastructure associated with the Bunnerong Power Station, are of value to the community for its amenity and use only.</p> <p><u>Guidelines for Exclusion</u></p> <ul style="list-style-type: none"> • is only important to the community for amenity reasons <input checked="" type="checkbox"/> • is retained only in preference to a proposed alternative <input type="checkbox"/>
<p>E – Research Potential</p> <p><i>An item has potential to yield information that will contribute to an understanding of the local area's cultural or natural history.</i></p> <p><u>Guidelines for Inclusion</u></p> <ul style="list-style-type: none"> • has the potential to yield new or further substantial scientific and/or archaeological information <input checked="" type="checkbox"/> • is an important benchmark or reference site or type <input type="checkbox"/> • provides evidence of past human cultures that is unavailable elsewhere <input type="checkbox"/> 	<p>The subject site has the potential to yield information regarding the remnant water inlet tunnel and power station infrastructure. The remnant structures provide physical evidence of the form and construction of power station hydro infrastructure of this period.</p> <p><u>Guidelines for Exclusion</u></p> <ul style="list-style-type: none"> • the knowledge gained would be irrelevant to research on science, human history or culture <input type="checkbox"/> • has little archaeological or research potential <input type="checkbox"/> • only contains information that is readily available from other resources or archaeological sites <input type="checkbox"/>
<p>F – Rarity</p> <p><i>An item possesses uncommon, rare or endangered aspects of the local area's cultural or natural history.</i></p>	<p>A comparative assessment with other sites used for power station hydro inlet tunnels has not been undertaken, however it is acknowledged that there are a number of hydro electric power stations listed as heritage items under local government administration (these listings are usually associated with the power station building itself where extant). Notwithstanding that the Bunnerong Power Station building is no longer in existence, the subject site is considered to have rarity value associated with its remnant tunnel structure, which provide the only remaining physical evidence of the former Bunnerong Power Station, which was the second power station to supply electricity to Sydney.</p>

Criteria	Significance Assessment
<p><u>Guidelines for Inclusion</u></p> <ul style="list-style-type: none"> • provides evidence of a defunct custom, way of life or process <input type="checkbox"/> • demonstrates a process, custom or other human activity that is in danger of being lost <input type="checkbox"/> • shows unusually accurate evidence of a significant human activity <input checked="" type="checkbox"/> • is the only example of its type <input type="checkbox"/> • demonstrates designs or techniques of exceptional interest <input type="checkbox"/> • shows rare evidence of a significant human activity important to a community <input checked="" type="checkbox"/> 	<p><u>Guidelines for Exclusion</u></p> <ul style="list-style-type: none"> • is not rare <input type="checkbox"/> • is numerous but under threat <input type="checkbox"/>
<p>G – Representative</p> <p><i>An item is important in demonstrating the principal characteristics of a class of NSWs (or the local area's):</i></p> <ul style="list-style-type: none"> • <i>cultural or natural places; or</i> • <i>cultural or natural environments.</i> 	<p>The subject site is generally undeveloped above ground, and presents as a vegetated area of foreshore along Botany Bay. Its remnant water inlet tunnel structures below ground, and opening to the bay, are representative of early twentieth century hydro electricity infrastructure and the supply and generation of electricity, and are more specifically associated with the former Bunnerong Power Station.</p>
<p><u>Guidelines for Inclusion</u></p> <ul style="list-style-type: none"> • is a fine example of its type <input type="checkbox"/> • has the principal characteristics of an important class or group of items <input type="checkbox"/> • has attributes typical of a particular way of life, philosophy, custom, significant process, design, technique or activity <input checked="" type="checkbox"/> • is a significant variation to a class of items <input type="checkbox"/> • is part of a group which collectively illustrates a representative type <input type="checkbox"/> • is outstanding because of its setting, condition or size <input type="checkbox"/> • is outstanding because of its integrity or the esteem in which it is held <input type="checkbox"/> 	<p><u>Guidelines for Exclusion</u></p> <ul style="list-style-type: none"> • is a poor example of its type <input type="checkbox"/> • does not include or has lost the range of characteristics of a type <input type="checkbox"/> • does not represent well the characteristics that make up a significant variation of a type <input type="checkbox"/>

5.3. STATEMENT OF SIGNIFICANCE – SUBJECT SITE

The subject site is a generally undeveloped and vegetated area of the Botany Bay foreshore. The original topography and promontory form of the subject site was degraded and obscured through the creation of the Port Botany wharves with land reclamation in the 1970s.

The site has historical and associative heritage value associated with its use in providing infrastructure for the former Bunnerong Power Station, which was located to the north at the present-day site of Botany Road. The Bunnerong Power Station was the second power station developed in Sydney to provide electricity to the city, and operated between 1925 and the 1970s.

The subject site was developed with hydro tunnel infrastructure underneath the surface, to create a large water inlet tunnel to draw water from Botany Bay into the Bunnerong Power Station. The tunnel infrastructure appears to have been wholly below the natural ground level of the land, tunnelled into the exposed sandstone rock face presenting to Botany Bay. There are remnant sections of this tunnel extant within the subject site (exposed and underground), which are the only physical remains of the Bunnerong Power Station visible today.

The Bunnerong Power Station was designed by renowned architect Henry Eli White, who is best known for his theatres, including Sydney’s State Theatre and Capitol Theatre. White was also an architect of hydro related industrial infrastructure in Australia and New Zealand.

5.4. ESTABLISHED SIGNIFICANCE OF THE BOTANY BAY NATIONAL PARK HERITAGE CONSERVATION AREA

The following record of the heritage conservation area’s significance has been taken directly from Randwick Council documentation.

Table 2 – Established Significance of the Botany Bay National Park Heritage Conservation Area

Element	Assessment
Aesthetic Significance	<p>The aesthetic significance of the conservation area as a whole arises from the scenic value of the natural landscape, and a number of man-made features within it. The conservation area is in a topographically prominent position in Sydney, at the entrance to Botany Bay, opposite Kurnell.</p> <p>Yarra Bay and Frenchmans Bay are mostly modified natural landscapes. Some areas of original native vegetation remain. The landscape is characterised by wide sand beached in the two bays, separated by low rocky headlands, and low dunes with scrub vegetation behind. This landform contrasts with the mostly treeless hill of Botany Cemetery, dotted with rows of headstones, which forms a backdrop to the north. The Federation period Yarra Bay House is a prominent feature of the headland between Yarra Bay and Frenchmans Bay.</p> <p>The La Perouse headland is part of, but physically distinct from, the remainder of Botany Bay National Park, to the east. The peninsula is bare and grassy. It has a rounded form, sloping gently to the shoreline, with some low cliffs. The fortified Bare Island juts into Botany Bay and is connected to the mainland by a wooden bridge. The other major man-made physical features of the peninsula are the Macquarie Watchtower, the Cable Station and the La Perouse Monuments.</p> <p>Botany Bay National Park, to the east of the La Perouse peninsula, preserves a large area of indigenous bushland. Most of the area of the NSW Golf Course and St Michaels Golf Course is open space, though there are some remnant areas of native bushland between the fairways. An area of native bushland adjacent to Jennifer Street is also preserved in this part of the conservation area.</p> <p>Prince Henry Hospital is built above the rocky foreshore of Little Bay. The hospital is set in an open landscape, and there is some surviving native vegetation. The hospital contains groupings of weatherboard and brick buildings dating from Federation period and later. The hospital cemetery is located to the south of the main group of hospital buildings, next to St Michaels Golf Course. The</p>

Element	Assessment
	<p>open space of the sea-side landscape extends to the north of the hospital site, on land which is owned by the University of New South Wales.</p>
<p>Historic Significance</p>	<p>The conservation area was the location of some of the earliest contacts between Aboriginal people and Europeans on the east coast of Australia. The existing landscape and man-made features provide evidence of and are associated with, numerous historical events and processes, in the intervening period of more than two centuries.</p> <p>Governor Phillip first set foot on Australian soil in the vicinity of Yarra Bay, on January 18 1788. Yarra Bay was the location of Chinese market gardens from the 1860's. Some market gardens still survive in the area. In 1901 the Yarra Bay Pleasure Grounds were established.</p> <p>Leisure pursuits have been a major use of the area for all of the 20th Century. Botany Cemetery was established in 1872.</p> <p>The La Perouse headland represents Australia's 'front door', where the early Colony encountered the rest of the world, through the processes of exploration, settlement, defence and overseas communication.</p> <p>The La Perouse Monuments are internationally significant because of their association with the La Perouse expedition of 1788. The Macquarie Watchtower, constructed c1820, is nationally significant in representing the earliest permanent occupation of the Botany Bay area by Europeans. It is the oldest building in the Randwick City area. Bare Island Fort, constructed from 1881 to 1885, is one of the finest examples in Australian of a Victorian period military fortification. The Cable Station, constructed in 1882, represents an important stage in the development of Australia's overseas communications, following establishment of cable telegraph in 1876. The Snake Pit demonstrates the history of the use of the area for tourism, which intensified after introduction of the tram service in 1902.</p> <p>La Perouse is also the location of one of the oldest urban aboriginal communities in Australia, established in c1870.</p> <p>Botany Bay National Park was created in 1970.</p> <p>Prince Henry Hospital was established in 1881 on an isolated site at Little Bay, as a result of a smallpox epidemic. Its original name was the Coast Hospital. New development occurred in 1919 as a result of an influenza epidemic.</p>
<p>Social Significance</p>	<p>The natural and man-made landscapes of the conservation area have social significance because of their value to the community as a recreational resource. Many of the historical uses of the conservation area are remembered by groups in the community, or continue today.</p> <p>The La Perouse area has special significance to the aboriginal community because of its history of use before and after European contact. La Perouse headland provided access to plentiful food sources in the sea and on the land. The occupants of the area in 1788 were of either the Bidjigal or Cadigal group of Eora language speakers. Aboriginal occupation around Botany Bay continued until the early 1800's. The population was decimated by disease, disrupted lives and colonial policy.</p> <p>The second phase of aboriginal occupation began as early as 1870. Aboriginal groups, primary from the South Coast, settled at La Perouse after being displaced from camps in the city. The area still suited a subsistence lifestyle, primarily fishing. Commercial income came from fishing and the sale of souvenirs to tourists.</p>

Element	Assessment
	<p>The presence of the Aboriginal community at La Perouse was a factor in the government creating an Office for the Protector of Aborigines. The community had its status formalized by the creation of a reserve under the Aborigines Protection Board in 1883. The La Perouse aboriginal community has maintained a strong sense of identity over the intervening years.</p>
<p>Technical / Research Significance</p>	<p>There are several remnant bushland areas in the Yarra Bay area. Hill 60 is the largest. There is an area of scrub between Baragollar Avenue and Yarra Road which contains regionally rare indigenous plant species. On Yarra Point there is a significant stand of <i>Casuarina glauca</i>.</p> <p>More than 95 hectares of remnant bushland is preserved in Botany Bay National Park and parts of the NSW and St Michaels Golf Courses. The bushland is regionally significant. A number of plant communities are present, including sclerophyll forest, scrub and heath and some wetland types. One plant community, Eastern Suburbs Banksia Scrub, is listed as an endangered ecological community under the Threatened Species Conservation Act (NSW) and the Threatened Species Protection Act (Commonwealth).</p> <p>The site of Prince Henry Hospital and the neighbouring properties contain numerous areas, totalling almost 20 hectares, of regionally significant bushland. The bushland includes Eastern Suburbs Banksia Scrub. Two nationally rare and several regionally rare plant species are present. There are two large ponds on the University of NSW property which are a habitat for native bird species and a vulnerable bat species under the Threatened Species Conservation Act (NSW).</p> <p>The Little Bay Geological Site is an area of approximately 6 hectares, to the rear of the University of NSW Sports Field. The geological site is of national significance. It is the only site containing peat of Miocene age known on the coast of NSW.</p>

The current statement of significance for the Heritage Conservation Area is as follows:

The area comprises an extensive stretch of dramatic coastline including several areas of remnant bushland and a number of sites of early Aboriginal and European contact. La Perouse is also the location of one of the oldest urban Aboriginal communities in Australia.

5.5. ABORIGINAL CULTURAL HERITAGE

This report relates only to the assessment of built ('European') heritage, and does not provide an assessment of Aboriginal cultural heritage or archaeological potential. An Aboriginal Heritage Due Diligence Assessment was undertaken by Artefact in September 2017. The conclusions of this report are included hereunder for reference purposes only.

Aboriginal archaeological sensitivity

The study area is mapped as having constituted level headland, fronting foreshore which ranges from steeply banked elevated rocky outcrop, to sandy beachfront. Headland formation and proximity to water are legislated features of archaeological potential. Aboriginal people in the past will likely have used the water frontage for extraction and consumption of marine resources, and may have preferentially camped near these resources.

The study area is within the immediate surrounds of areas of possible elevated archaeological sensitivity associated with dune formations.

However, historical impacts on the study area are likely to have considerably reduced archaeological potential within it. The study area has been subject to significant disturbance and is unlikely to contain significant extents of preserved Aboriginal archaeological deposits.

It is possible that isolated areas of preserved sands remain in the study area. It is also possible that rock outcroppings including a recorded Aboriginal rock engraving may be present in the study area.

Detection of these preserved areas and rock outcroppings, and the general assessment of archaeological potential in the study area require a site inspection.

Summary

- *The study area is considered of low sensitivity for Aboriginal archaeological values.*
- *The study area is within two areas of legislated archaeological sensitivity. It is a headland, and is within 200m of water.*
- *There are no recorded Aboriginal sites within the study area.*
- *One poorly recorded site may be present in the study area (rock engraving “45-6-0639 ‘Botany Bay; Bumborah Point’”), however this has not been formally reidentified since recording in 1897.*
- *One Restricted site (AHIMS 45-6-2752) is located in or in the vicinity of the study area. Spatial and content detail for this site is not publicly available.*
- *A study of the historical land use of the study area indicates that it has been subject to significant disturbance that may include considerable changes to the study area landform.*
- *These disturbances include those associated with installation of multiple different subterranean infrastructures, and possibly deposition of material from the historical Bunnerong Power Station.*

Figure 16 – Extract of Artefact’s Aboriginal Heritage Due Diligence Assessment showing the potential location of a poorly recorded Aboriginal site



Source: Artefact 2017, *Aboriginal Heritage Due Diligence Assessment*, p.43

6. IMPACT ASSESSMENT

6.1. STATUTORY CONTROLS

6.1.1. Local Environmental Plan

The proposed works are addressed in the table below in relation to the relevant clauses in the LEP.

Table 3 – Local Environmental Plan

Clause	Discussion
<p>(2) Requirement for consent</p> <p>Development consent is required for any of the following:</p> <p>(a) demolishing or moving any of the following or altering the exterior of any of the following (including, in the case of a building, making changes to its detail, fabric, finish or appearance):</p> <p>(i) a heritage item,</p> <p>(ii) an Aboriginal object,</p> <p>(iii) a building, work, relic or tree within a heritage conservation area,</p> <p>(d) disturbing or excavating an Aboriginal place of heritage significance...</p>	<p>The Planning Proposal seeks to add an additional land use for the subject site, which is located within a heritage conservation area. The Artefact Aboriginal Heritage Due Diligence Assessment report also concludes that the site's Aboriginal archaeological potential has likely been impacted by historical development and use, and is unlikely to contain significant or preserved Aboriginal archaeological deposits. Accordingly, consent for the Planning Proposal is required under this clause.</p>
<p>(4) Effect of proposed development on heritage significance</p> <p>The consent authority must, before granting consent under this clause in respect of a heritage item or heritage conservation area, consider the effect of the proposed development on the heritage significance of the item or area concerned. This subclause applies regardless of whether a heritage management document is prepared under subclause (5) or a heritage conservation management plan is submitted under subclause (6).</p>	<p>The Planning Proposal seeks consent for a new use to be added to the permitted uses for the subject site. The new use, being 'cemetery', is intended to facilitate the expansion of the ESMC to the north. Whilst cemetery use is a new use and requires landscaping and excavation for burials, it is a generally passive use which does not require large built structures.</p> <p>The design of any future cemetery expansion on the site would take the form of a contemporary 'lawn cemetery', and as such, large headstones and monuments would not be permitted throughout the site, and restricted only to a small portion of burials adjoining the existing cemetery. Instead of monuments throughout the subject site, plaques would be placed on graves which would be maintained as grassed and landscaped rows.</p> <p>While this future development will change the current shrubbery vegetation of the site, it would enable the site to be maintained as a landscaped property with grass, trees and shrubs being located to appropriately respond to the site's coastal location and topography. The Concept Masterplan included herein identifies that the intent of the future lawn cemetery is to provide small patches of lawn burials, lined with avenues and clusters of</p>

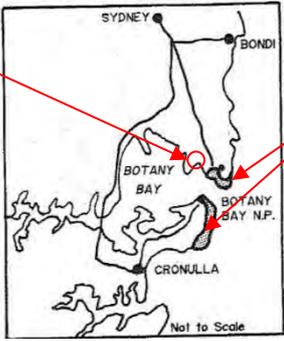
Clause	Discussion
	<p>existing and new trees. Footpaths and limited roads would meander through the site.</p> <p>The portion of the site to be dedicated to a lawn cemetery extension will be centrally located on the knoll of the site, whilst the southern periphery of the site bordering the foreshore will be retained as natural shrubbery. The retention of a 'buffer zone' of natural shrubbery along the foreshore will enable the site to retain its connection with the broader Botany Bay National Park Heritage Conservation Area, and also allow it to be read and understood as part of the natural foreshore landscape.</p> <p>Burials would be standard double-depth graves. The Concept Masterplan included herein shows that future burials would avoid the significant underground infrastructure associated with the former Bunnerong Power Station, as well as typical underground services and infrastructure, by only occurring outside of areas under which this infrastructure lies. Therefore, future development of a cemetery that would be facilitated by this Planning Proposal, will not have any adverse impacts or physical intervention into, the significant tunnel infrastructure of the former Bunnerong Power Station.</p> <p>The Planning Proposal will enable the subject site to be used for burials and cemetery-associated landscaping works, and will therefore alter the 'natural' shrubbery character of the site. However, the provision of significant areas of natural shrubbery along the periphery of the site (with a 20-metre buffer zone of vegetation to the shoreline), and the provision of a passive, low-scale use which includes a high degree of landscape, will ensure that the site retains its connection with the character of the Botany Bay National Park Heritage Conservation Area. The natural topography of the site will also block views to the lawn cemetery when viewed from the foreshore.</p> <p>The subject site will still be read, when viewed from the foreshore, as a connecting portion of the Botany Bay National Park Heritage Conservation Area, and the provision of natural shrubbery along the southern periphery of the subject site maintains the continuation of the 'natural' National Park flora along the whole extent of Yarra Bay.</p> <p>The foreshore running south along Yarra Bay from the subject site is also a listed heritage item of local significance. The significance of this item is its natural National Park character, and as discussed above, the subject site will still be able to contribute to the significance of this item through the retention of foreshore shrubbery. The subject site is located within vicinity to the state-significant Chinese Market Gardens heritage item. There will be no physical or visual impact on either of these vicinity heritage items as a result of future development facilitated by this Planning Proposal.</p> <p>Overall the Planning Proposal is considered to be acceptable with regard to its potential heritage impact. Notwithstanding that new cemetery-related development would be permissible within the subject site (which forms part of the Botany Bay National Park Heritage Conservation Area), it will be a low-scale passive use without built structures, appropriately landscaped and screened from the significant foreshore. This form of future development will</p>

Clause	Discussion
	not impact on the contribution of the subject site to the natural bushland character of the Botany Bay National Park Heritage Conservation Area.
<p>(5) Heritage assessment</p> <p>The consent authority may, before granting consent to any development:</p> <ul style="list-style-type: none"> (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), <p>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 of the heritage item or heritage conservation area concerned.</p>	<p>This heritage impact statement has been undertaken to assist the consent authority in their determination, and to assess the potential impact of the Planning Proposal on the significance of the Botany Bay National Park Heritage Conservation Area. This Planning Proposal seeks consent for a new use to be added to the permitted uses for the subject site. No physical or built works are proposed, and this would require a further development application. Notwithstanding that there are no built works proposed, our impact assessment has had regard to the Concept Masterplan included at Section 3.2.1, as an indication of the future works which would be facilitated by this Planning Proposal.</p>

6.1.2. Development Control Plan

The proposed works are addressed in the table below in relation to the relevant provisions in the DCP.

Table 4 – Development Control Plan

Clause	Discussion
<p>2 DEVELOPMENT CONTROLS 2.2 Design and Character</p>	
<p>All Development</p> <p>i) Development must demonstrate how it respects the heritage values of the heritage item or the heritage conservation area (as detailed in the statements of significance and key characteristics outlined in this section of the DCP).</p>	<p>As discussed in detail above, the Planning Proposal will facilitate future cemetery development at the subject site. However, the provision of significant areas of natural shrubbery along the periphery of the site, and the provision of a passive, low-scale use which includes a high degree of landscape, will ensure that the site retains its connection with the character of the Botany Bay National Park Heritage Conservation Area. The natural topography of the site will also block views to the lawn cemetery when viewed from the foreshore.</p> <p>The subject site will still be read, when viewed from the foreshore, as a connecting portion of the Botany Bay National Park Heritage Conservation Area, and the provision of natural shrubbery along the southern periphery of the subject site maintains the continuation of the 'natural' National Park flora along the whole extent of Yarra Bay.</p> <p>The foreshore running south along Yarra Bay from the subject site is also a listed heritage item of local significance. The significance of this item is its natural National Park character, and as discussed above, the subject site will still be able to contribute to the significance of this item through the retention of foreshore shrubbery. The subject site is located within vicinity to the state-significant Chinese Market Gardens heritage item. There will be no physical or visual impact on either of these vicinity heritage items as a result of future development facilitated by this Planning Proposal.</p> <p>This HIS does not assess potential impact on Aboriginal cultural heritage.</p>
<p>4 HERITAGE CONSERVATION AREAS 4.1 Botany Bay National Park Heritage Conservation Area</p>	
<p><u>4.1.3 Guidelines for Change</u></p> <p>The majority of the heritage conservation area is managed by the NSW Office of Environment and Heritage (OEH) to maintain its natural and cultural heritage values. The parts of the area managed by Council are generally subject to Plans of Management which recognise heritage values. Any development within the area of Botany Bay National Park should refer to any Plans of Management prepared by the NSW Office of Environment and Heritage.</p>	<p>The subject site is located outside of the boundary of the land originally reserved for the Botany Bay National Park (that is, the land subject to NSW OEH's Plan of Management). Therefore, the subject site is not subject to the Botany Bay National Park Plan of Management.</p> <div style="text-align: center;">  <p>LOCALITY DIAGRAM</p> <p>SYDNEY BONDY</p> <p>BOTANY BAY BOTANY BAY N.P.</p> <p>CRONULLA</p> <p>Not to Scale</p> </div>

6.2. CONSIDERATION OF CONSISTENCY WITH S117 DIRECTIONS

The Planning Proposal seeks to permit 'cemetery' use on the site by way of a Schedule 1 Amendment to the Randwick Local Environmental Planning (LEP) 2012. The current Section 117 (S117) Directions 2.3 *Heritage Conservation* (effective date 1 July 2009), issued under the former Section 117 of the Environmental Planning and Assessment Act (EP&A Act) 1979, requires the following:

(4) A planning proposal must contain provisions that facilitate the conservation of:

(a) items, places, buildings, works, relics, moveable objects or precincts of environmental heritage significance to an area, in relation to the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item, area, object or place, identified in a study of the environmental heritage of the area,

(b) Aboriginal objects or Aboriginal places that are protected under the National Parks and Wildlife Act 1974, and

(c) Aboriginal areas, Aboriginal objects, Aboriginal places or landscapes identified by an Aboriginal heritage survey prepared by or on behalf of an Aboriginal Land Council, Aboriginal body or public authority and provided to the relevant planning authority, which identifies the area, object, place or landscape as being of heritage significance to Aboriginal culture and people.

As there are no changes proposed to the Randwick LEP 2012 heritage schedule or mapping, or the compulsory heritage provisions in Clause 5.10 *Heritage Conservation*, as part of this Planning Proposal, it is considered that the Planning Proposal is consistent with the S117 Directions in relation to European heritage.

7. CONCLUSION AND RECOMMENDATIONS

The heritage significance assessment included at Section 5 has concluded that the subject site has historical and associative heritage value associated with its use in providing infrastructure for the former Bunnerong Power Station, which was located to the north at the present-day site of Botany Road. The Bunnerong Power Station was the second power station developed in Sydney to provide electricity to the city, and operated between 1925 and the 1970s. There are remnant sections of this tunnel extant within the subject site (exposed and underground), which are the only physical remains of the Bunnerong Power Station visible today.

The Planning Proposal has been assessed in detail at Section 6, with regard to its potential heritage impact on the vicinity heritage items and the *C5 Botany Bay National Park (Botany Bay National Park, La Perouse Headland, Yarra Bay and Frenchmans Bay) HCA*. Notwithstanding that there are no built works proposed as part of this proposal, our heritage impact assessment has had regard to the Concept Masterplan included at Section 3.2.1, as an indication of the future works which would be facilitated by this Planning Proposal.

Overall, the Planning Proposal is considered to be acceptable, and will not result in a future use or development that would detrimentally affect the significance of the subject site, vicinity heritage items or conservation areas, for the following reasons:

- The portion of the site to be dedicated to a lawn cemetery extension will be centrally located on the knoll of the site, whilst the southern periphery of the site bordering the foreshore will be retained as natural shrubbery. The retention of a 20-metre vegetated 'buffer zone' of natural shrubbery along the foreshore will enable the site to retain its connection with the broader Botany Bay National Park Heritage Conservation Area, and also allow it to be read and understood as part of the natural foreshore landscape. The natural topography of the site will also block views to the lawn cemetery when viewed from the foreshore.
- The subject site will still be read, when viewed from the foreshore, as a connecting portion of the Botany Bay National Park Heritage Conservation Area, and the provision of natural shrubbery along the southern periphery of the subject site maintains the continuation of the 'natural' National Park flora along the whole extent of Yarra Bay.
- While this future development will change the current shrubbery vegetation of the site, it would enable the site to be maintained as a landscaped property with grass, trees and shrubs being located to appropriately respond to the site's coastal location and topography. The Concept Masterplan included herein identifies that the intent of the future lawn cemetery is to provide small patches of lawn burials, lined with avenues and clusters of existing and new trees. Footpaths and limited roads would meander through the site.
- The design of any future cemetery expansion on the site would take the form of a contemporary 'lawn cemetery', and as such, large headstones and monuments would not be permitted throughout the site, and restricted only to a small portion of burials adjoining the existing cemetery. Instead of monuments throughout the subject site, plaques would be placed on graves which would be maintained as grassed and landscaped rows.
- Burials would be standard double-depth graves. The Concept Masterplan included herein shows that future burials would avoid the significant underground infrastructure associated with the former Bunnerong Power Station, as well as typical underground services and infrastructure, by only occurring outside of areas under which this infrastructure lies. Therefore, future development of a cemetery that would be facilitated by this Planning Proposal, will not have any adverse impacts or physical intervention into, the significant tunnel infrastructure of the former Bunnerong Power Station.
- The foreshore running south along Yarra Bay from the subject site is also a listed heritage item of local significance. The significance of this item is its natural National Park character, and as discussed above, the subject site will still be able to contribute to the significance of this item through the retention of foreshore shrubbery. The subject site is located within vicinity to the state-significant Chinese Market Gardens heritage item. There will be no physical or visual impact on either of these vicinity heritage items as a result of future development facilitated by this Planning Proposal.
- There are no proposed changes to the statutory heritage listings for the Botany Bay National Park Heritage Conservation Area or the vicinity heritage items as part of this Planning Proposal.

Overall the Planning Proposal is considered to be acceptable with regard to its potential heritage impact. Notwithstanding that new cemetery-related development would be permissible within the subject site (which forms part of the Botany Bay National Park Heritage Conservation Area), it will be a low-scale passive use without built structures, appropriately landscaped and screened from the significant foreshore. This form of future development will not impact on the contribution of the subject site to the natural bushland character of the Botany Bay National Park Heritage Conservation Area.

The Planning Proposal is therefore supported from a heritage perspective and recommended for approval.

8. BIBLIOGRAPHY AND REFERENCES

8.1. BIBLIOGRAPHY

Department of Lands 2018, Spatial Information Exchange, Department of Lands, Sydney, available at: <<http://imagery.maps.nsw.gov.au/>>.

Google Maps 2018, Aerial view of subject site, available at: <<http://maps.google.com.au/maps?hl=en&tab=wl>>.

8.2. REFERENCES

Apperly, R., Irving, R. and Reynolds, P. (eds) 2002, A Pictorial Guide to Identifying Australian Architecture: Styles and Terms from 1788 to the Present, Angus and Robertson, Pymble.

Australia ICOMOS 1999, The Burra Charter: 2013 The Australia ICOMOS Charter for Places of Cultural Significance, Australia ICOMOS, Burwood.

Heritage Office and Department of Urban Affairs & Planning 1996, NSW Heritage Manual, Heritage Office and Department of Urban Affairs & Planning (NSW), Sydney.

Heritage Office 2001, Assessing Heritage Significance, Heritage Office, Parramatta.

[Note: Some government departments have changed their names over time and the above publications state the name at the time of publication.]

DISCLAIMER

This report is dated 5 July 2018 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd's (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Southern Metropolitan Cemeteries Trust (**Instructing Party**) for the purpose of Heritage Impact Assessment (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

In preparing this report, Urbis may rely on or refer to documents in a language other than English, which Urbis may arrange to be translated. Urbis is not responsible for the accuracy or completeness of such translations and disclaims any liability for any statement or opinion made in this report being inaccurate or incomplete arising from such translations.

Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.



BRISBANE

Level 7, 123 Albert Street
Brisbane QLD 4000
Australia
T +61 7 3007 3800

GOLD COAST

45 Nerang Street,
Southport QLD 4215
Australia
T +61 7 5600 4900

MELBOURNE

Level 12, 120 Collins Street
Melbourne VIC 3000
Australia
T +61 3 8663 4888

PERTH

Level 14, The Quadrant
1 William Street
Perth WA 6000
Australia
T +61 8 9346 0500

SYDNEY

Tower 2, Level 23, Darling Park
201 Sussex Street
Sydney NSW 2000
Australia
T +61 2 8233 9900

CISTRI – SINGAPORE

An Urbis Australia company
#12 Marina View
21 Asia Square, Tower 2
Singapore 018961
T +65 6653 3424
W cistri.com