

Western Gateway Sub-Precinct Proposal: Block B

14–30 Lee Street, Haymarket NSW 2000

Archaeological Assessment

Report prepared for Dexu CPA Pty Limited and Frasers Property AHL Limited

October 2019



Sydney Office Level 6 372 Elizabeth Street Surry Hills NSW Australia 2010 T +61 2 9319 4811

Canberra Office 2A Mugga Way Red Hill ACT Australia 2603 T +61 2 6273 7540

GML Heritage Pty Ltd ABN 60 001 179 362

www.gml.com.au

Report Register

The following report register documents the development and issue of the report entitled Western Gateway Sub-Precinct Proposal: Block B—Archaeological Assessment, undertaken by GML Heritage Pty Ltd in accordance with its quality management system.

Job No.	Issue No.	Notes/Description	Issue Date
18-0703C	1	Draft Report	26 July 2019
18-0703C	2	Final Report	16 September 2019
18-0703C	3	Revised Final Report	9 October 2019

Quality Assurance

GML Heritage Pty Ltd operates under a quality management system which has been certified as complying with the Australian/New Zealand Standard for quality management systems AS/NZS ISO 9001:2016.

The report has been reviewed and approved for issue in accordance with the GML quality assurance policy and procedures.

Report Author:	Sophie Jennings	Project Manager & Reviewer:	Don Wallace
Issue No.	3	Issue No.	3
Position:	Senior Heritage Consultant	Position:	Associate
Date:	9 October 2019	Date:	9 October 2019

Copyright

Historical sources and reference material used in the preparation of this report are acknowledged and referenced at the end of each section and/or in figure captions. Reasonable effort has been made to identify, contact, acknowledge and obtain permission to use material from the relevant copyright owners.

Unless otherwise specified or agreed, copyright in this report vests in GML Heritage Pty Ltd ('GML') and in the owners of any pre-existing historic source or reference material.

Moral Rights

GML asserts its Moral Rights in this work, unless otherwise acknowledged, in accordance with the (Commonwealth) *Copyright (Moral Rights) Amendment Act 2000*. GML's moral rights include the attribution of authorship, the right not to have the work falsely attributed and the right to integrity of authorship.

Right to Use

GML grants to the client for this project (and the client's successors in title) an irrevocable royalty-free right to reproduce or use the material from this report, except where such use infringes the copyright and/or Moral Rights of GML or third parties.

Contents	Page
1.0 Introduction	1
1.1 Project Objectives	2
1.2 The Project	3
1.3 Site Ownership	4
1.4 Site Location	5
1.5 Methodology	7
1.6 Limitations	7
1.7 Author Identification	7
1.8 Integrity of Graphic Illustrations	7
2.0 Historical Overview	8
2.1 Introduction	8
2.2 Aboriginal Country	8
2.3 The Town Limits—Gateway	8
2.4 Development of the Railway and Expansion	9
2.5 Changing Use and the New Millennium	10
3.0 Statutory Framework	18
3.1 Statutory Framework Overview	18
3.1.1 <i>NSW Heritage Act 1977 (NSW)</i>	18
3.1.2 <i>National Parks and Wildlife Act 1974 (NSW)</i>	19
3.2 Approach to Aboriginal Heritage Management	19
3.2.1 <i>Due Diligence Approach</i>	19
3.2.2 <i>Due Diligence Process</i>	20
3.3 Environmental Planning and Assessment Act 1979 (NSW)	21
3.3.1 <i>Sydney Local Environmental Plan 2012</i>	21
4.0 Site Analysis	22
4.1 Site Description	22
5.0 Assessment of Aboriginal Archaeological Potential	24
5.1 Landscape Context	24
5.1.1 <i>Geology and Soil Landscape</i>	24
5.1.2 <i>Hydrology</i>	25
5.1.3 <i>Flora and Fauna</i>	25
5.2 Archaeological Context	26
5.2.1 <i>Aboriginal Heritage Information Management System</i>	26
5.2.2 <i>Relevant Archaeological Studies</i>	28
5.3 Predictive Model of Aboriginal Archaeological Potential	29
6.0 Assessment of Historical Archaeological Potential	31
6.1 Overview	31
6.1.1 <i>Archaeological Potential</i>	31
6.1.2 <i>Archaeological Significance</i>	31
6.2 Historical Development	31

6.2.1 Phase 1: Town Limits Gateway	32
6.2.2 Phase 2: Development of the Railway and Expansion	32
6.2.3 Phase 3: Changing Use and the New Millennium	32
6.3 Relevant Archaeological Studies	32
6.4 Analysis of Site Disturbance.....	33
6.5 Statement of Historical Archaeological Potential.....	34
6.6 Assessment of Archaeological Significance	36
7.0 Archaeological Impact Assessment	37
7.1 Summary of Proposed Works	37
7.2 Potential Archaeological Impacts.....	37
7.3 Approvals and Mitigation Measures	37
8.0 Conclusions and Recommendations	38
8.1 Recommendations.....	38
9.0 Endnotes.....	39

1.0 Introduction

Dexus CPA Pty Ltd (Dexus) and Frasers Property Australia (Frasers Property) (the Consortium) is seeking to build 'a vibrant new business district and revitalise the face of Sydney's busiest transport interchange' (Project Vision) at 14–30 Lee Street, Haymarket, otherwise known as the Site or Block B within the Western Gateway Sub-Precinct, as illustrated in Figure 1.1.



Figure 1.1 Central Station Precinct (marked in white) and Western Gateway Precinct (orange shading) (Source: The Consortium)

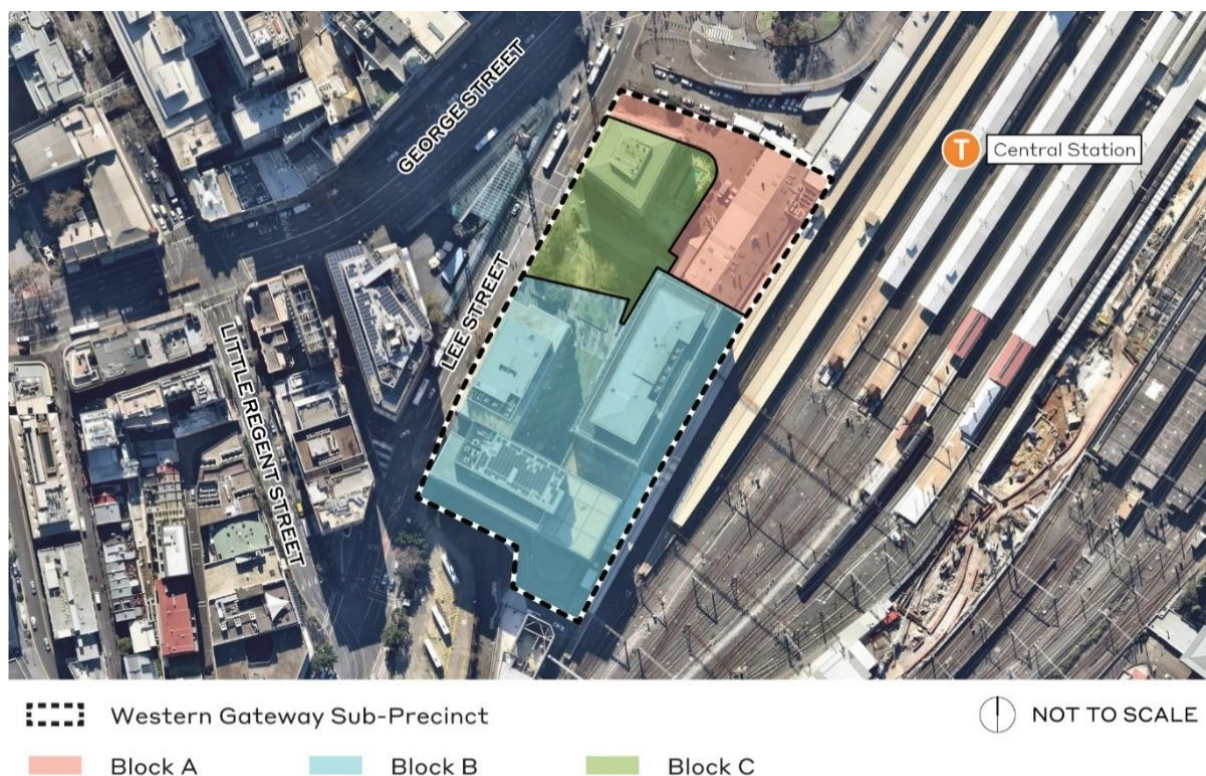


Figure 1.2 Western Gateway landholdings. (Source: The Consortium)

To facilitate redevelopment of the Western Gateway sub-precinct, the existing planning controls are required to be amended. This report supports a submission to the Secretary of the Department of Planning, Industry and Environment ('the DPIE') which seeks to amend the height and density controls within the *Sydney Local Environmental Plan 2012* (Sydney LEP 2012).

The request to amend the planning controls follows the recent declaration by the Minister for Planning and Public Spaces identifying the Central Station Precinct as a State Significant Precinct (SSP). The Western Gateway, located within the Central Station Precinct SSP, is earmarked as a sub-precinct within the proposed SSP boundary for early consideration for rezoning.

Transport for New South Wales (TfNSW) is developing a vision for the growth and development of this precinct and is preparing a Strategic Framework to guide future detailed planning of the Central Station Precinct. The Strategic Framework will be placed on exhibition for public comment concurrently with the rezoning of the Western Gateway.

1.1 Project Objectives

The proposed rezoning forms part of a broader planning process being pursued by the Consortium to realise a shared vision and set of objectives for the Western Gateway and the Central Station Precinct more broadly. The overall project objectives for Block B include:

- High tech jobs—Deliver creative workspace that builds the Sydney Innovation and Technology Precinct and underpins Sydney's enduring global competitiveness.
- Transport connectivity—Redefine the experience of over 20 million pedestrians who walk through Henry Deane Plaza every year with world-class public realm design and connectivity.

- A revitalised precinct—Transform Central into an exciting place with lively retail and dining options, supporting Sydney's day and night-time economy.
- Infrastructure for the future—Enable the wider renewal of Central by delivering underground smart building services, waste and utility infrastructure necessary for an integrated and sustainable precinct.



Figure 1.3 Block B within the Western Gateway Sub-Precinct (existing). (Source: The Consortium)

1.2 The Project

The Consortium intends to develop up to 155,000m² of commercial and retail GFA within a podium, two towers, lower and upper ground plane over a three level basement. The Project comprises:

- Two commercial towers comprising 46,000m² and 42,000m² located above the podium with floorplates of approx. 1,850 m² and 2,000m² GFA;
- 61,500m² of commercial office space located within the podium which provide flexibility and campus style / large floorplates approx. 6,200m² GFA,
- A retail offering of approx. 5,500m² accessible from lower and upper ground levels, including food and beverage catering to station, visitors and Western Gateway commercial occupants providing an activated frontage and interface to Henry Deane Plaza. This includes an activated Lee Street frontage and lobby located at upper ground level, providing access to the commercial office podium levels and towers above.
- Three levels of basement car parking to accommodate:
 - 48 service vehicle and loading dock parking and distribution area within an Integrated Distribution Facility (IDF)

- Service vehicle, loading dock and distribution area for all stakeholders within the Western Gateway;
- Provision for emergency, maintenance and service vehicle parking and distribution area for future Central Over Station Development (OSD within the IDF);
- 121 parking spaces for Block B occupants;
- Provision for Block A and C vehicle access via the Block B;
- Bicycle parking and end of trip facilities for staff;
- Bicycle parking spaces for customers/visitors;
- Podium and tower rooftops designed for passive activation and gatherings for occupants of the Project to utilise and appreciate the views of the city and harbour;
- Redeveloped public space and stairs from Block B to future Central Precinct Over Station Development (OSD) providing an east-west pedestrian connection to and from the Western Gateway Sub-Precinct;
- Integration with a redeveloped Henry Deane Plaza to accommodate the increased pedestrian movement from existing and future pedestrian connections to various modes of transport;

To prepare Block B for future development, an increase in building height and floor space controls is sought. These proposed amendments to the Sydney LEP 2012 align with State, regional and local strategic planning objectives and initiatives.

This report should be read in conjunction with the Planning Statement prepared by MG Planning, and the other appended technical reports.

1.3 Site Ownership

The Consortium's Proposal relates to land located at 14–30 Lee Street, Haymarket. It is legally described as Lots 12, 14 and 15 in DP 1062447. Legal descriptions of each parcel within Block B are detailed below.

Title Details	Legal Description
Lot 12 in DP 1062447	The proprietor of the fee simple is Rail Corporation of New South Wales. The proprietor of the leasehold estate of the land and the buildings on the land created by lease AA651830 expiring on 30 June 2099 is Dexus CPA Pty Ltd A.C.N. 160 685 156.
Lot 14 in DP 1062247	The proprietor of the fee simple is Rail Corporation of New South Wales. The proprietor of the leasehold estate of the land and the buildings on the land created by lease AA651832 expiring on 30 November 2100 is Henry Deane Building Nominees Pty Ltd A.C.N. 081 941 951.
Lot 15 in DP 1062447	The proprietor of the fee simple is Rail Corporation of New South Wales. The proprietor of the leasehold estate of the land and the buildings on the land created by lease AA651833 expiring on 31 March 2101 is Gateway Building Nominees Pty Ltd A.C.N. 081 951 822.

1.4 Site Location

Located close to Central Station, Block B comprises land fronting Lee Street, Haymarket, and is bounded by Henry Deane Plaza to the north, the railway corridor to the east, the Sydney Buses layover to the south and Lee Street and Railway Square to the west. Together it constitutes an area of approximately 9,632m² at ground level, with a dimension from north to south of approximately 103–143m and approximately 74–81m from east to west (Figure 1.4).

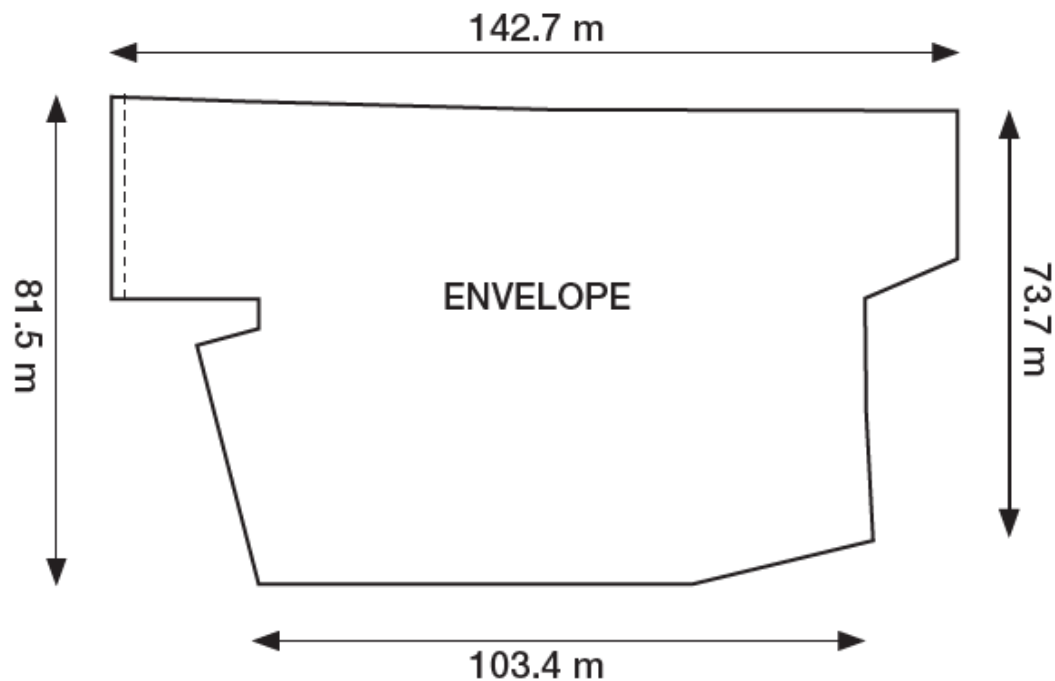


Figure 1.4 Block B site boundary. (Source: Woods Bagot and Skidmore, Owings & Merrill [SOM] Architects)

Henry Deane Plaza (located on the lower datum) is centrally located within the Western Gateway and primarily funnels pedestrians between Devonshire Street tunnel, accessed from the Site's eastern boundary, and Lee Street tunnel, Railway Square, and tertiary institutions to the west.

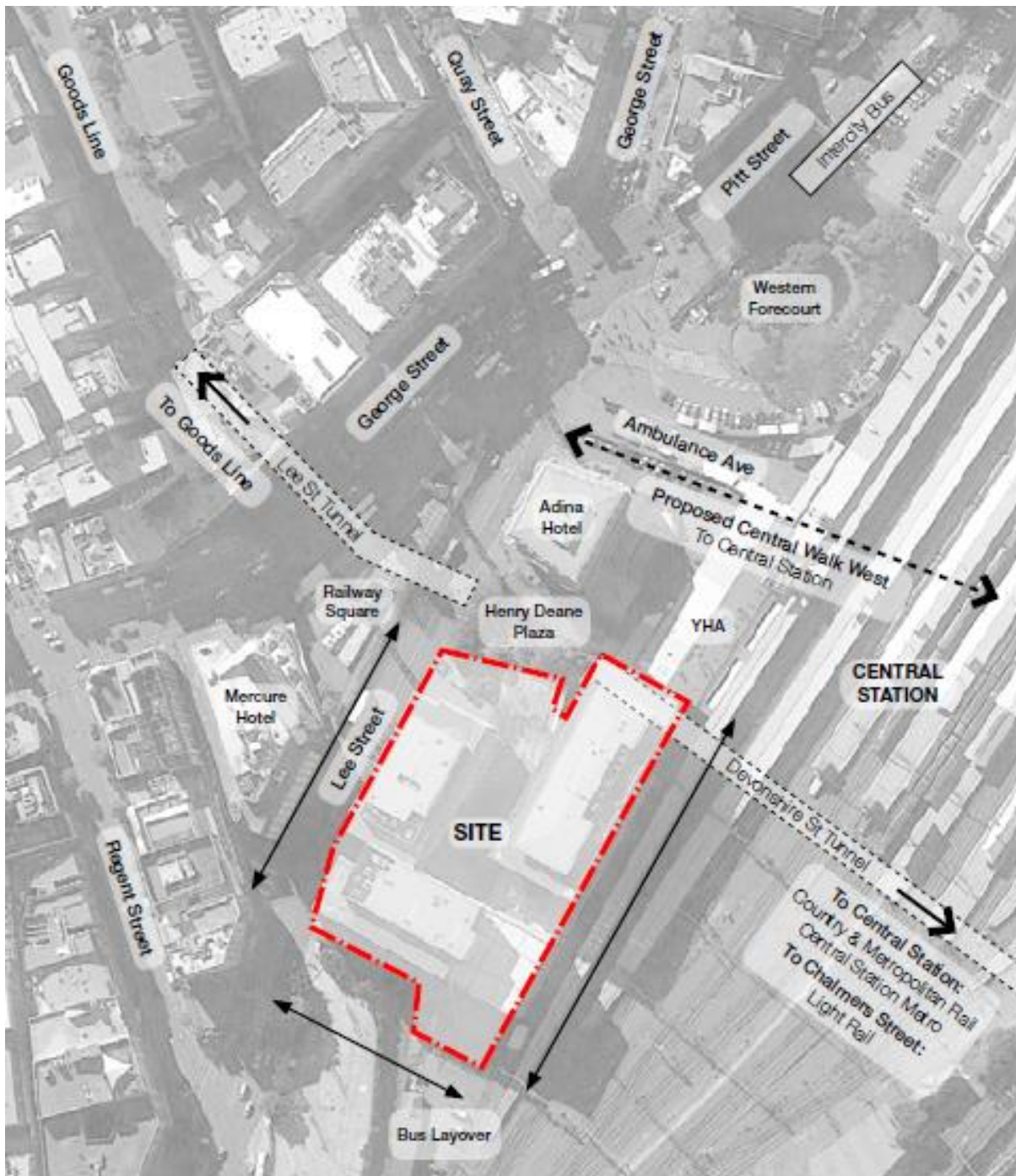


Figure 1.5 Block B site boundary. (Source: Woods Bagot & SOM Architects)

The upper level of Block B flanks Henry Deane Plaza to the north and south (part of Block C). The state heritage listed Adina Hotel (part of Block C) and Sydney Railway Square Youth Hostel (YHA) (Block A) are located north of Henry Deane Plaza. South of Henry Deane Plaza is dominated by more contemporary office buildings of approximately 20 years' age which are occupied by state and Commonwealth agencies including Transport for NSW, Department of Immigration and Border Protection, Department of Foreign Affairs and Trade, and Corrective Services NSW.

A range of food and beverage outlets and service retail tenancies are located across both the lower and upper levels of the Western Gateway precinct.

1.5 Methodology

This archaeological assessment and Aboriginal due diligence report has been prepared in accordance with the following management documents and best practice guidelines:

- Assessing Significance of Historical Archaeological Sites and Relics, 2009;
- Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW, 2010;
- Rappaport / NSW Government Architect's Office, Central Station Conservation Management Plan, 2013;
- NSW Heritage Office, NSW Heritage Manual, 'Statements of Heritage Impact', 2002;
- NSW Heritage Office, NSW Heritage Manual, 'Archaeological Assessments', 1996;
- NSW Heritage Branch, Assessing Significance for Historical Archaeological Sites and Relics, 2009; and
- the Burra Charter.

Inspection has been undertaken from the public domain only. The interiors and basements of the existing building and the interface with the Goods Line Overbridge have not been inspected.

Assessment of potential heritage impacts of the proposal is beyond the scope of this report. Additional information can be found in GML's Heritage Impact Statement, August 2019.

1.6 Limitations

As this report was prepared in accordance with the Department of Planning, Industry and Environment's Due Diligence guidelines, it does not include a formal systematic archaeological survey or an assessment of Aboriginal cultural heritage significance.

This report does not include consultation with the Aboriginal community, as it is not required by the due diligence process.

Historical overlays have not been georeferenced. If further works proceed on this Site, comprehensive mapping should be undertaken.

1.7 Author Identification

This report has been prepared by Emily Bennett (Heritage Consultant, Archaeologist) and Sophie Jennings (Senior Heritage Consultant, Archaeologist) of GML. The report has been reviewed by Dr Madeline Shanahan (Associate / Manager, Public History and Research) and Don Wallace (Associate).

1.8 Integrity of Graphic Illustrations

This report contains graphics taken from historic records and third-party documents. The legibility and resolution of the source material varies. For illustrative purposes, some are magnified as they relate to the Site. In some instances, this has further reduced legibility. Notes on resolution are given in captions where relevant.

2.0 Historical Overview

2.1 Introduction

This historical context is provided to assist in understanding the historic phases and principal historical events that have contributed to the significance of the place.

2.2 Aboriginal Country

Aboriginal occupation of Sydney can be traced through the archaeological records to at least 22,000 years ago, with some estimates extending towards 35,000 years. The Sydney area supported the Eora, more than 30 separate clans woven together by intermarriage across the region. Most clans took their names from their Country, like the Gadigal along the harbour's southern shore, or the Wangal from Wanne, the lower reaches of the Parramatta River, or the Kamaygal from Kamay, Botany Bay. Others, like the Cammeragal from the harbour's northern shore, may have been named for their role in ceremony and law, and the skills of their clever men or karadji. Among the 30 Sydney clans, it was these four in particular who bore the initial brunt of the arrival of Europeans and whose men and women moved amongst the colonists. It is they who are described in most European accounts of the period.

The Aboriginal people who lived around the area now occupied by Central Station are likely to have been the Gadigal. The Gadigal of the local area focused largely on collecting and hunting marine resources. Terrestrial animals and plant resources would still have played an important role in the subsistence of the Gadigal. The transitional environments of the lower slopes between the low-lying estuarine swamp behind Darling Harbour to the west, the Turpentine–Ironbark forest of the ridge top, and the sand dune and wetland ecosystems to the east may have provided a diverse range of significant resources for the local population that was likely exploited.

The arrival of the First Fleet at Sydney Cove in 1788, and the subsequent expansion of the colony, spelled the beginning of the local Aboriginal peoples' removal from their traditional Country. The Gadigal, whose lands were at the initial focal point of European colonisation, were among the first to suffer the effects. The Gadigal and their neighbours were denied access to their campsites, hunting grounds, and the numerous natural resources and Dreaming sites which they relied on in their daily life. The arrival of the First Fleet irreparably disrupted cultural, social and religious structures across the Sydney region, and eventually Australia.

However, historical sources from the nineteenth century document that Aboriginal people continued to live around Sydney, generally forced to the fringes of settlement. These records indicate that Aboriginal people tended to camp along coastal areas in proximity to freshwater creeks or streams. Aboriginal people continued to camp in the area now occupied by Prince Alfred Park until the mid-nineteenth century. Construction of the railway in 1855 pushed Aboriginal people further outwards. The Aboriginal community at Redfern developed during the early twentieth century when people migrated to the area to work in the factories. Aboriginal people continue to live in Redfern and maintain strong connections to the Sydney region.

2.3 The Town Limits—Gateway

The Site's location was considered a distant area early in the settlement of Sydney by British colonists. The land was a mix of sand hills, wetlands and a sandstone plateau which was unsuited to farming. Until the 1820s the only notable developments of the area were 'Brickfields', an area which was cleared to

produce bricks and pottery, and Parramatta Road, which had been created by convicts in 1789–1791 (Figure 2.1).

Development began in earnest in 1818, when it was cleared to make way for a Benevolent Asylum and a cemetery. These were located at the outer limit of Sydney town, beyond the markets and the Brickfields, on the land which Central Station now covers and outside of the Site (Figures 2.2 and 2.3). The cemetery was consecrated in 1820 and the Benevolent Asylum opened in 1821, both surviving until the end of the century.

Barracks to house convicts were also built around this time and were known as Carters' Barracks. The barracks were adjacent to the Benevolent Asylum and had multiple uses throughout its existence. It was first used to house convicts who worked as carters at the brickfields, then as a debtors' prison until 1843, before it was converted to a training facility for women.

The Parramatta toll gate near these buildings was the official boundary of the town of Sydney. Beyond this were mainly Government Paddocks and undeveloped land.

2.4 Development of the Railway and Expansion

The interior of New South Wales began to be settled for agricultural and pastoral use around the 1830s, putting pressure on the infrastructure of the colony as goods moved from the interior to the ports. Around the same time rail technology was being developed in Great Britain, which was seen as a solution to the colony's problems. By 1846 a railway line between Sydney and Parramatta had been proposed and construction began in 1851.

The site of the Sydney terminus was fixed in 1853 in the Government Paddocks to the south of the Devonshire Street Cemetery and Benevolent Asylum. Two years later it was completed along with the rest of the railway (Figure 2.4). This included the Goods Line, which split off from the passenger line down through Ultimo to Darling Harbour, now under Railway Square.

For the rest of the nineteenth century, pressure on the railways steadily increased, resulting in a series of extensions and expansions of the lines coming in and out of Central Station. The Second Sydney Station, opened in 1874, saw the expansion of the number of platforms at the station to 13. More tracks were laid during this period, and the lines coming into the station were expanded.

Another phase of development began in 1900 with the resumption of the land covering the Benevolent Asylum, Cemetery and Barracks. This area was resumed for construction of a 'grand terminus' that reflected styles already established in Europe and North America. Construction of the first phase of this redevelopment was completed in 1906, when the main concourse and terminus that stands today were completed (Figure 2.6).

At the same time, the facilities of the station were expanded. This included the construction of the Western Carriage Shed, a large sawtooth-roofed brick shed, and the Inward Parcels Shed, which included the ramp up to it. The shed was built on a raised earth platform on the side of Lee Street and had a stone retaining wall (Figure 2.7–2.10). The Western Carriage Shed sat between the Goods Line tunnel and the lines to the terminus.

The nearby Parcels Post Office was completed in 1913 close to the levels of Railway Square below the Parcels Shed and Western Carriage Shed (Figure 2.10). The second phase of the new Central Station construction occurred between 1915–1921, when the clock tower and upper levels of Central Station were completed. After the 1920s, substantial billboard hoardings were erected on the retaining wall of

the Western Shed's raised platform. These covered the shed from view when looking from Railway Square and provided space for advertisements.

2.5 Changing Use and the New Millennium

The Western Carriage Shed was used as a cleaning and maintenance facility for most of the twentieth century, later becoming disused. The Goods Line, which lies beside it, operated until the 1980s. By the late 1990s, the shed was in disrepair. It was demolished along with the inwards Parcels Dock and Parcels Dock awning in 1999 to make way for the Henry Deane Plaza development (Figure 2.11). Since 2000, the Site has largely been unchanged.



Figure 2.1 Extract of Charles Alexandre Lesueur's 1802 map of Sydney showing the road to Parramatta (George Street and Broadway) turning to the west. 'Plan de la ville de Sydney : (Capitale des colonies Anglaises aux Terres Australes) / leve par Mr. Lesueur & assujetti aux relevemens de Mr. Boullanger (Novembre, 1802).' North at the top of the page. Approximate location of Site circled red. Legibility reduced by magnification. (Source: National Library of Australia, MAP NK 3578)

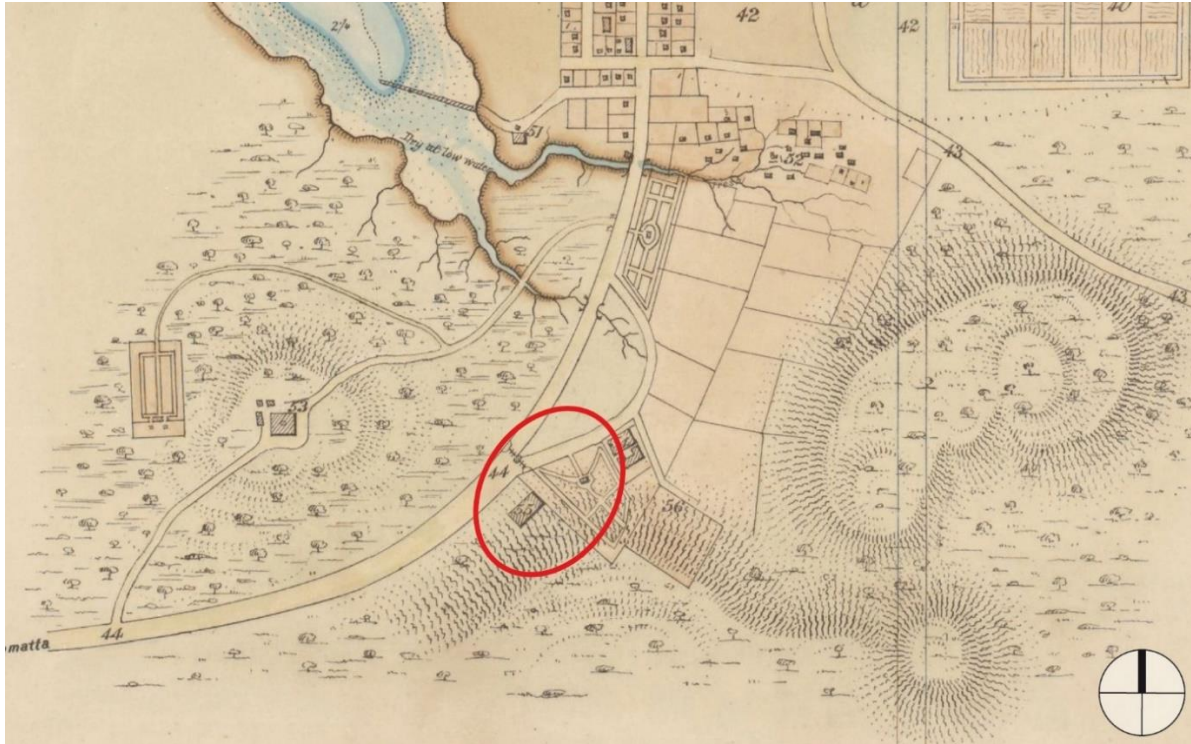


Figure 2.2 Detail from plan of the town and suburbs of Sydney, 1822, showing the approximately location of the Site in an undeveloped area on the fringes of Sydney. (Source: State Library of NSW with GML overlay)

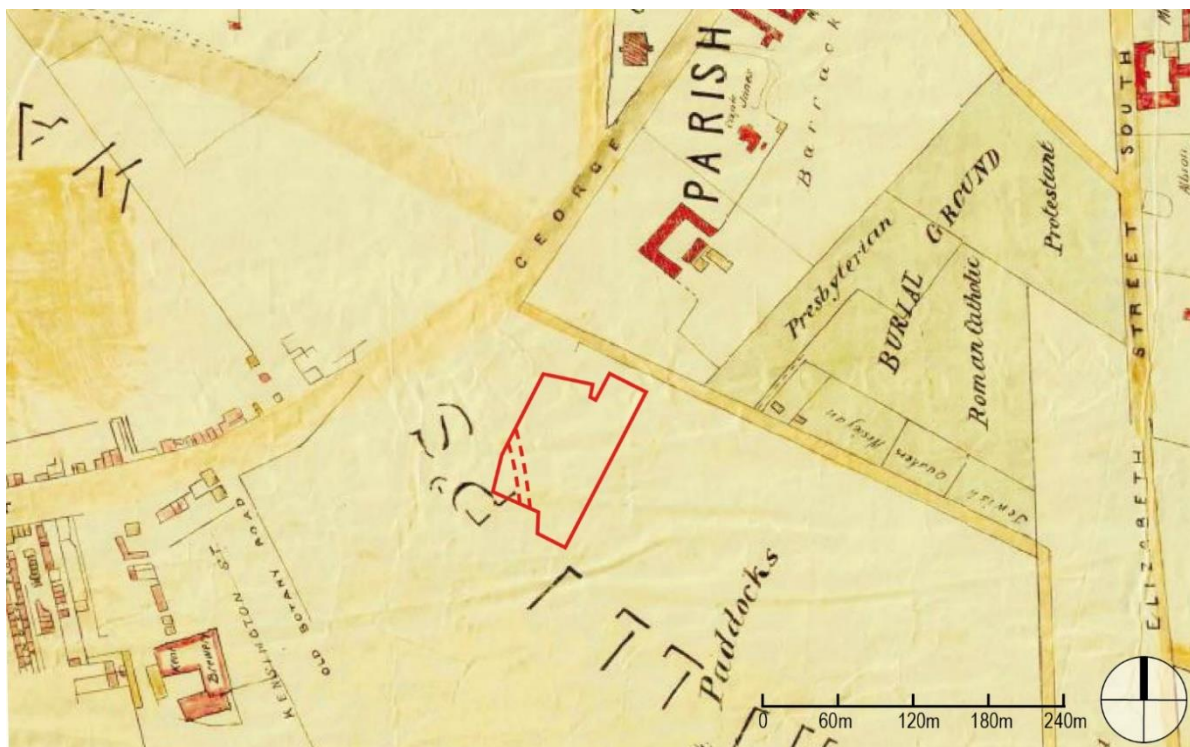


Figure 2.3 Extract of Francis W. Shields' 1845 'Map of the City of Sydney New South Wales'. It shows the Carters' Barracks, the Benevolent Asylum to its south (unnamed) and the Government Paddocks south of the Devonshire Street Cemetery. Christ Church St Laurence (1840–1845) is also shown. North at the top of the page. Approximate location of Site outlined in red. Legibility reduced by magnification. (Source: City of Sydney with GML overlay)

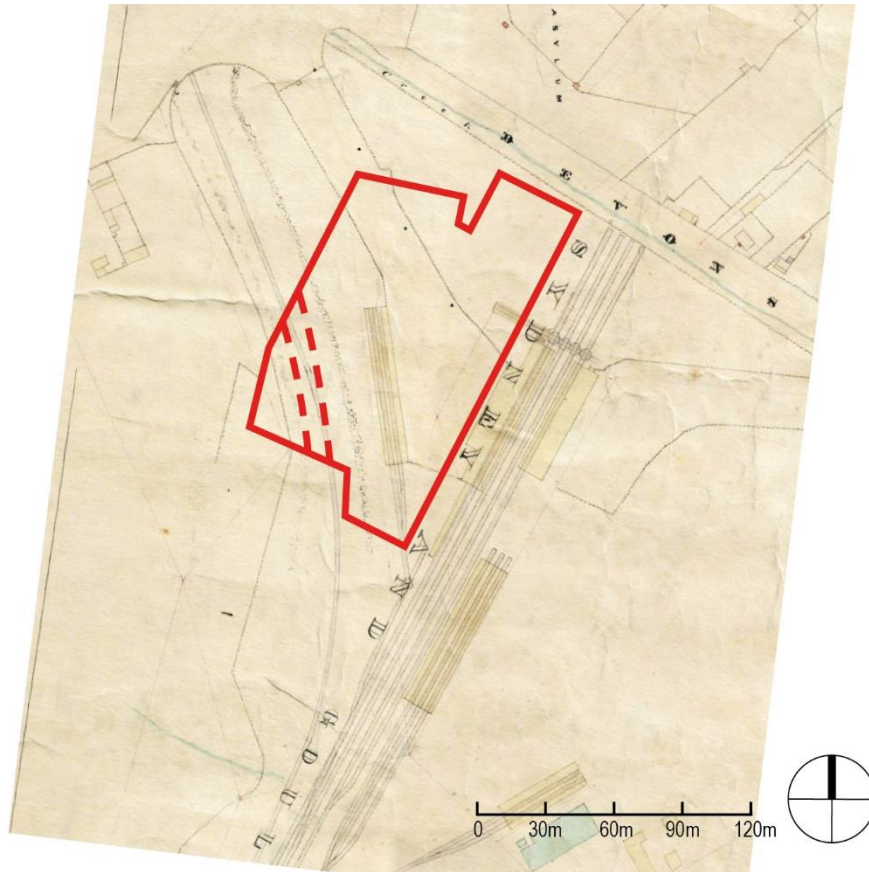


Figure 2.4 1855 Sydney Detail Plans, 1855, showing the terminus of the Sydney Railway and the dive of the branch to Darling Harbour. (Source: City of Sydney with GML overlay)

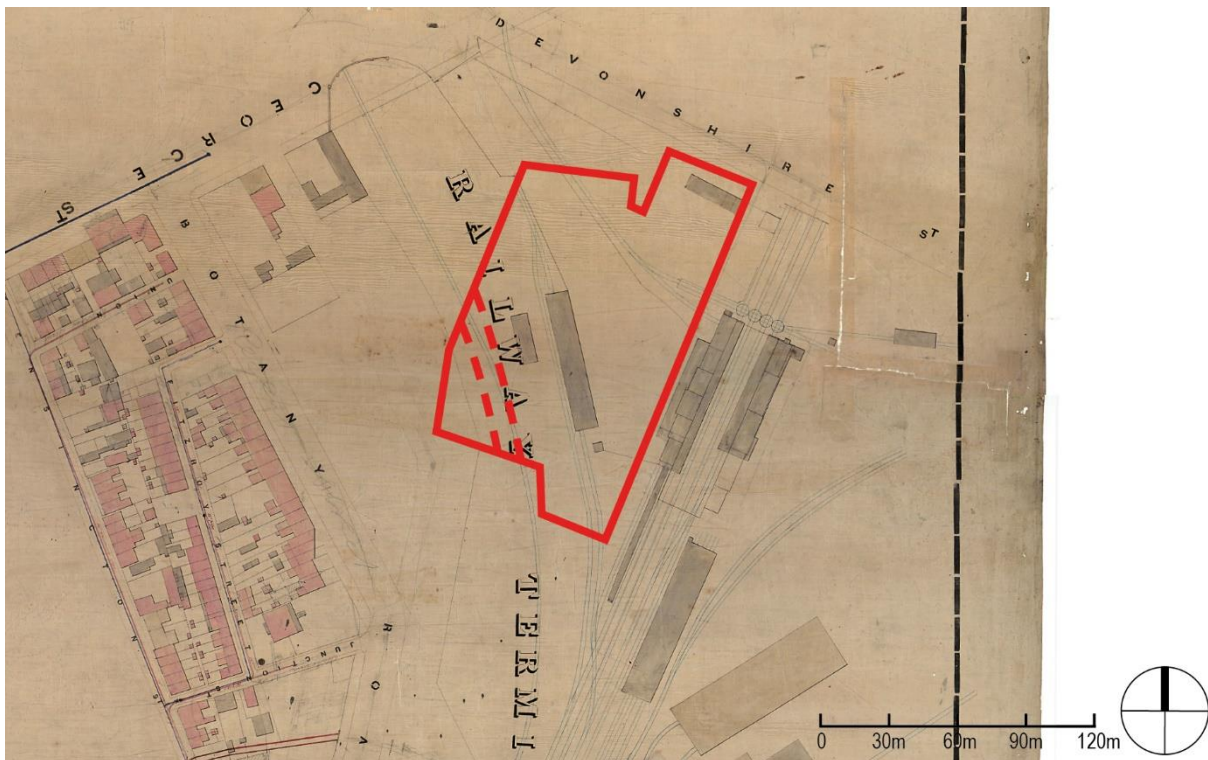


Figure 2.5 1865 Trigonometrical Survey (Block S2, Map 38) showing further development of the terminus. (Source: City of Sydney with GML overlay)

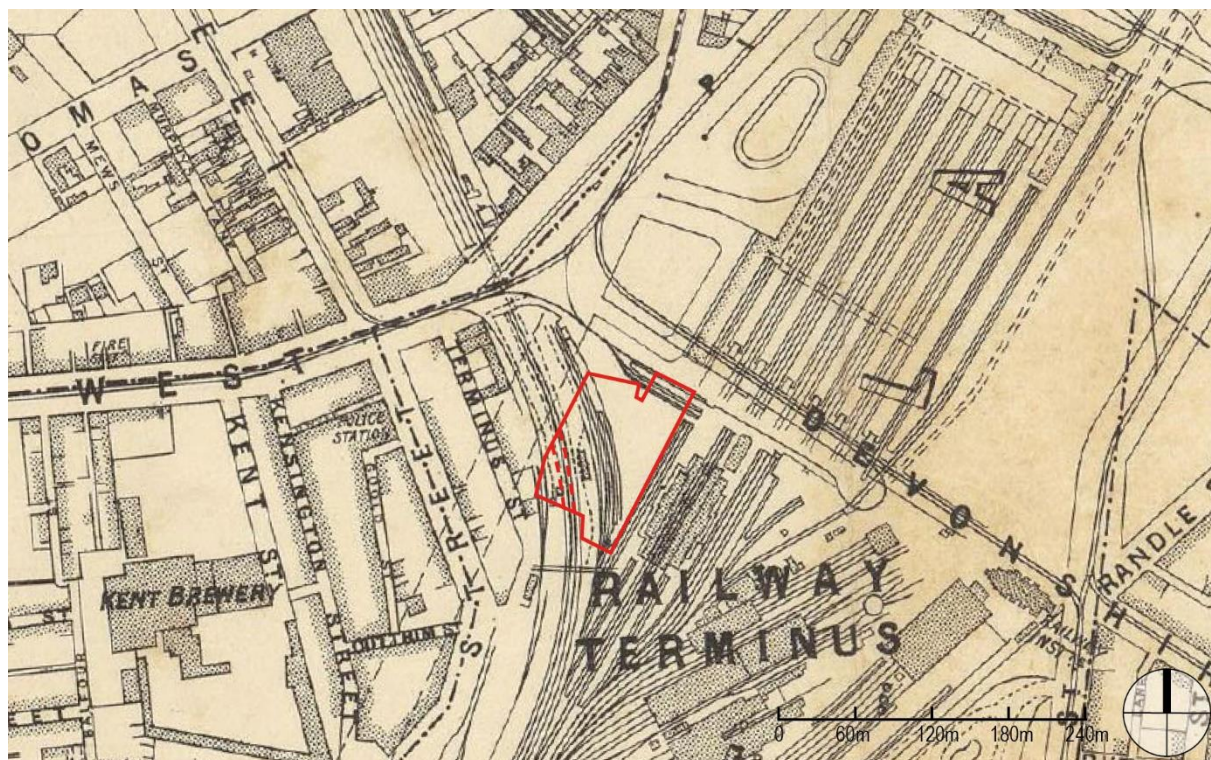


Figure 2.6 1903 Map of the City of Sydney showing the extension of the terminus incorporating the former Devonshire Street cemetery. (Source: City of Sydney with GML overlay)



Figure 2.7 1903 southwestern view across the expansion of Central Station. Photograph shows parts of the original topography of the Site, including remnant Botany Sands (red arrow). (Source: NSW State Archives and Records Authority, 1740 a014 a014000266)



Figure 2.8 1908 view to the northeast across the newly constructed Central Station. The entrance to the Devonshire Street tunnel is shown at (1). The Site (2) is partially visible at the right-hand side—its retaining wall indicates the depth of fill imported to raise the site above street level. (3) is the site of the Parcels Post Office under construction. (Source: NSW State Archives and Records Authority 1740 a014 a014001399 with GML additions)



Figure 2.9 Railway Square showing the large billboard hoardings on the retaining wall along Lee Street (red arrow). The Post Parcel Office (now the Adina Hotel) was added in 1913. (Source: State Library of NSW with GML overlay)

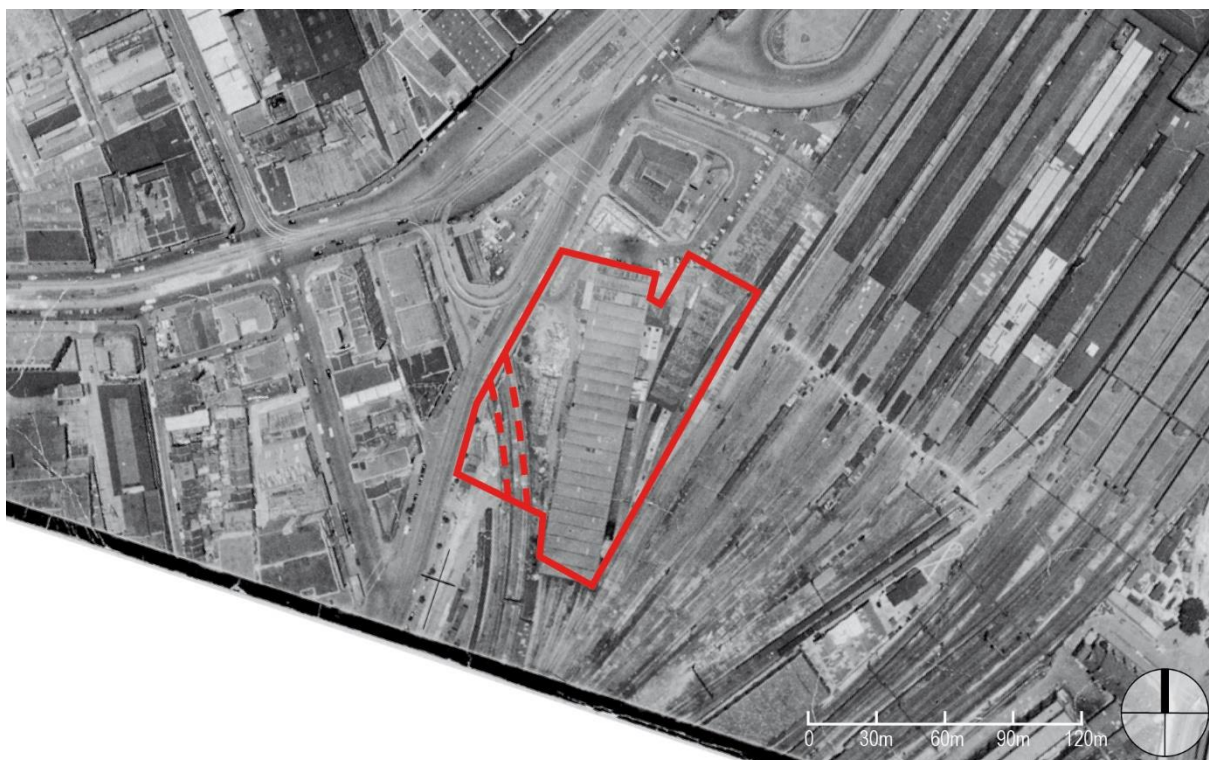


Figure 2.10 A 1949 aerial of Central Station showing the Western Carriage Shed with the sawtooth roof. (Source: NSW Spatial Services with GML overlay)

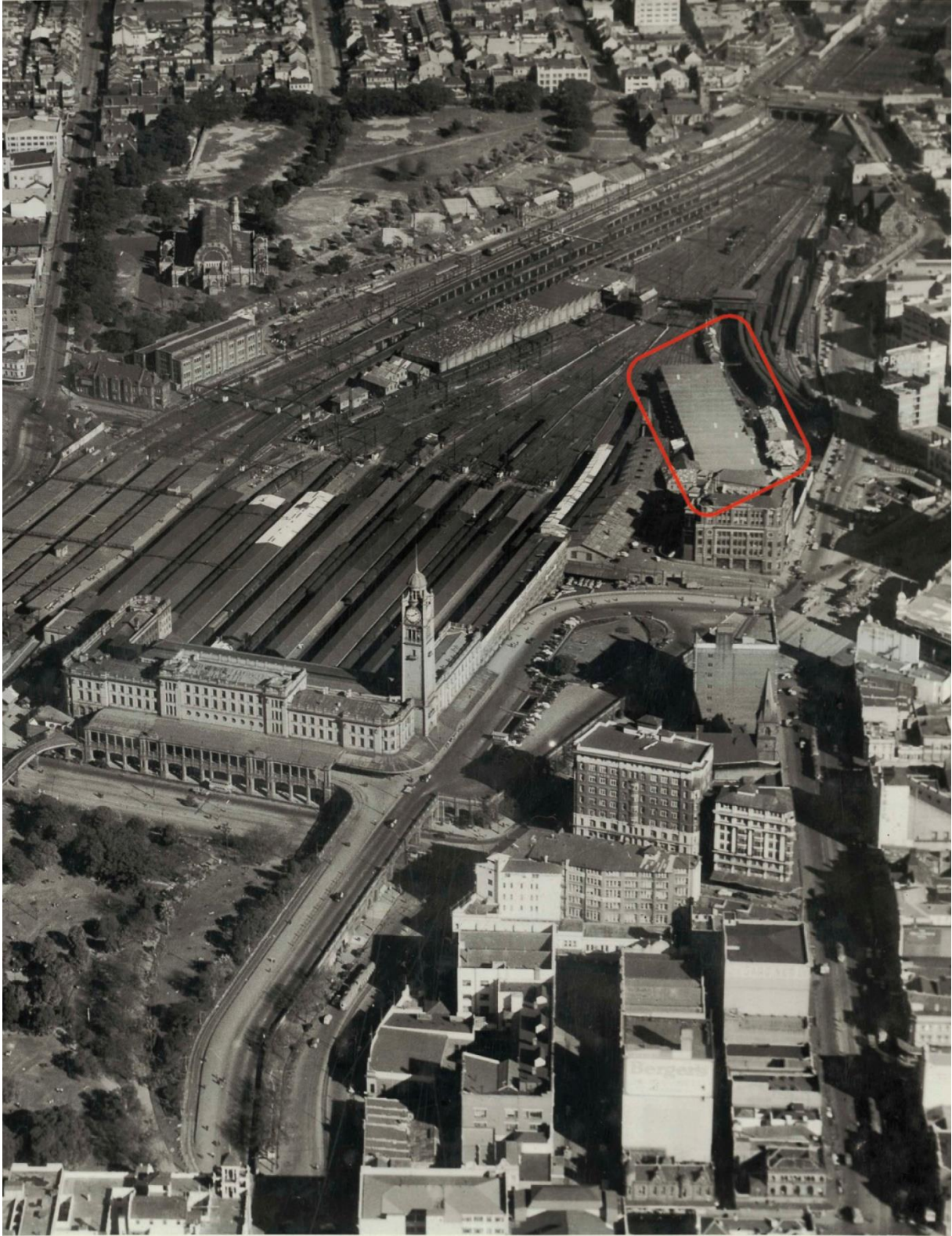


Figure 2.11 1947 oblique aerial of Central Station showing the Western Yard (outlined in red), which was completely removed by the construction of Henry Deane Plaza. (Source: City of Sydney Archives SRC11129)



Figure 2.12 Northern view of part of the Site showing the ground level excavated to bedrock. The Goods Line can be seen in the foreground. (Source: Frasers)

3.0 Statutory Framework

3.1 Statutory Framework Overview

In NSW items of heritage significance and archaeological remains (referred to as 'objects' or 'relics') are afforded statutory protection under the following Acts:

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

3.1.1 NSW Heritage Act 1977 (NSW)

State Heritage Register

The State Heritage Register (SHR) was established under Section 22 of the Heritage Act. It comprises a list of identified heritage items determined to be of significance to the people of New South Wales. The SHR includes items and places such as buildings, works, archaeological relics, movable objects or precincts. Central Station is listed on the SHR as item 01255, 'Sydney Terminal and Central Railway Stations Group'.

Section 170 Heritage and Conservation Register

Section 170 of the Heritage Act, as amended, requires that all state government instrumentalities establish and keep a Heritage and Conservation Register of heritage assets in their ownership and control. The Heritage Regulation 2012 requires that the Heritage and Conservation Register include items that are listed as heritage items under an environmental planning instrument made under the EPA Act.

- (a) *Items that are subject to an interim heritage order*
- (b) *Items that are listed on the State Heritage Register*
- (c) *Items identified by the government instrumentality concerned as having State heritage significance.*

Section 170A of the Heritage Act requires each state government instrumentality to ensure appropriate management of items on the Heritage and Conservation Register, including any items that are on the SHR. Central Station is listed on the RailCorp Section 170 Heritage and Conservation Register (S170 Register) (#4801296).

Relics Provisions

Archaeological relics outside SHR curtilages are protected under the relics provisions (Section 139 to 146) of the Heritage Act.

The Act defines 'relic' as any deposit, 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 139–145 of the Heritage Act prevent the excavation of a relic, except in accordance with an excavation permit (or an exemption from the need for a permit) issued by the Heritage Council of New South Wales.

Section 139 [1] of the Heritage Act states that:

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

Approval under these provisions is required to impact or harm archaeological relics.

3.1.2 National Parks and Wildlife Act 1974 (NSW)

All Aboriginal objects and places receive statutory protection under the NPW Act. Aboriginal objects are defined as:

... physical evidence of the use of an area by Aboriginal people. They can also be referred to as 'Aboriginal sites', 'relics' or 'cultural material' ...¹

Under the Act, applicants must seek approval prior to disturbance of sites with the potential to contain Aboriginal objects or cultural material. Harming Aboriginal objects and harming or desecrating Aboriginal places is also a liability offence under the Act. 'Harm' includes to destroy, deface, damage or move an Aboriginal object or declared Aboriginal place.

The Sydney LEP 2012 requires that the consent authority (City of Sydney), before granting consent to any development 'in an Aboriginal place of heritage significance', must:

- (a) consider the effect of the proposed development on the heritage significance of the place and any Aboriginal object known or reasonably likely to be located at the place by means of an adequate investigation and assessment (which may involve consideration of a heritage impact statement), and*
- (b) notify the local Aboriginal communities, in writing or in such other manner as may be appropriate, about the application and take into consideration any response received within 28 days after the notice is sent.*

3.2 Approach to Aboriginal Heritage Management

In order to administer the NPW Act and the EPA Act, the OEH has issued a series of best practice guidelines and policies. The approach to the preparation of this document was based on the following current best practice guidelines:

- Department of the Environment, Climate Change and Water, *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (13 September 2010) (the Due Diligence Code of Practice); and
- *The Burra Charter: the Australia ICOMOS Charter for Places of Cultural Significance 1999* (the Burra Charter).

3.2.1 Due Diligence Approach

The OEH-issued Due Diligence Code of Practice guideline defines a 'due diligence' approach to Aboriginal heritage. This guideline is designed to assist individuals and organisations to exercise due diligence when carrying out activities that may harm Aboriginal objects, and/or Aboriginal places, and to determine whether they should apply for consent in the form of an Aboriginal Heritage Impact Permit (AHIP).

The Consortium have adopted the Due Diligence Code of Practice as a best practice management tool for potential Aboriginal heritage objects, place and values which could be associated with the project.

The Due Diligence Code of Practice sets out the reasonable and practicable steps which individuals and organisations need to take in order to:

- identify whether or not Aboriginal objects are, or are likely to be, present in an area;
- determine whether or not their activities are likely to harm Aboriginal objects (if present); and
- determine whether an AHIP application is required.

The OEH has defined due diligence thus:

Due diligence is a legal concept describing a standard of care. Exercising due diligence means turning your mind to the likely risks of your proposed course of action. It is not enough to perform activities carefully. Due diligence requires consideration of your obligations under, in this case, the NPW Act, and the consideration and adoption of a course of action that is directed towards preventing a breach of the Act.

In the context of protecting Aboriginal cultural heritage, due diligence involves taking reasonable and practicable measures to determine whether your actions will harm an Aboriginal object and if so avoiding that harm.²

The steps that are required to follow the due diligence process are:

- searching the Aboriginal Heritage Information Management System (AHIMS);
- checking for landscape features which may indicate the presence of Aboriginal objects;
- devising strategies to avoid harming Aboriginal objects; and
- undertaking desktop assessment and visual inspection to confirm the presence of Aboriginal objects.³

In preparing this report, GML complied with the guidelines set out in the Due Diligence Code of Practice. The extent of land covered by the due diligence process is described as 'the Site' (Figure 1.2).

3.2.2 Due Diligence Process

In accordance with Step 1 of the OEH Due Diligence Code of Practice, it is identified that the proposed redevelopment of the Site will disturb the ground surface of the Site. Therefore, the following due diligence steps are presented in this report:

- Step 2a—AHIMS database search;
- Step 2b—the identification of landscape features that indicate the presence of Aboriginal objects;
- Step 3—discussion with respect to the extent of the development footprint;
- Step 4—desktop assessment and visual inspection; and
- Step 5—further investigation and impact assessment.

3.3 Environmental Planning and Assessment Act 1979 (NSW)

The EPA Act is administered by the NSW Department of Planning, Industry and Environment and provides for the protection of local heritage items and conservation areas through listings on Local Environmental Plans (LEPs) which guide local councils in making planning decisions.

3.3.1 Sydney Local Environmental Plan 2012

The Sydney LEP (SLEP) provides a framework for local development and planning. It outlines the requirements for managing heritage items and affords the consent authority discretion to require heritage assessments, conservation management plans and heritage impact assessments for proposed developments at or near heritage items. The objectives of heritage conservation stated in clause 5.10 of the SLEP are as follows

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

The SLEP includes a list of environmental heritage items that includes archaeological remains referred to as Schedule 5. Central Station is listed on the Sydney LEP as item 824—'Central Railway Station group including buildings, station yard, viaducts and building interiors'. Central is also the major component of the Railway Square/Central Station Special Character Area under the *Sydney Development Control Plan 2012* (Sydney DCP). The Site is not within the SHR curtilage of Central Station, but is listed as a general item I824 (same as Central Station) on the Sydney LEP.

4.0 Site Analysis

4.1 Site Description

A site inspection was undertaken by Emily Bennett on 12 July 2019, to record current site conditions. The following observations were made:

- The Site is a highly modified area including indoor and outdoor space and pedestrian thoroughfares from the eastern side of Central Station to Railway Square and from Henry Deane Plaza south onto Lee Street.
- No original ground surface was visible.
- Henry Deane Place is cut into the natural topography approximately one level below Lee Street.
- The eastern boundary abuts the boundary of Central Station.
- The dive of Darling Harbour/the Goods Line, which has been partially covered by the extant structures, is still visible from the southern side of the buildings.
- A dwarf sandstone wall and palisade fence remnant from use of the Site as the Western Yard is extant adjacent to the current southern property boundary.
- Both the northern and southern boundaries still exhibit a moderate slope from Lee Street east, up to the levels of Central Station rail tracks.
- No basement levels were observed in the extant structures but are reported to exist.

All photographs below were taken by GML during the Site visit.



Figure 4.1 View of Henry Deane Plaza from Railway Square.

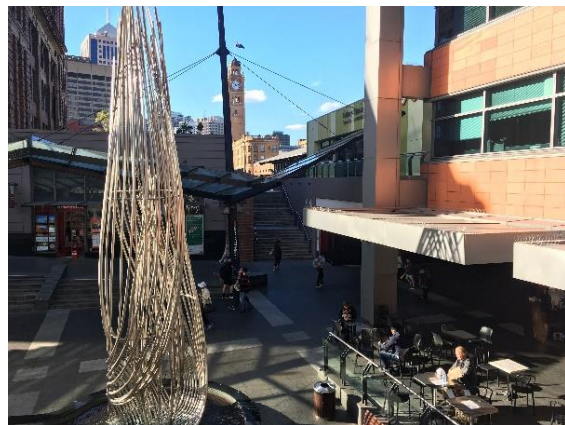


Figure 4.2 Henry Deane Plaza looking north to the Central Station clock tower.



Figure 4.3 The Goods Line under Henry Deane Place.



Figure 4.4 View south away from the Site.



Figure 4.5 Hump in roadway over the Goods Line.



Figure 4.6 Roadway south of Henry Deane Place.



Figure 4.7 Roadway south of Henry Deane Place.



Figure 4.8 Railway Square.

5.0 Assessment of Aboriginal Archaeological Potential

5.1 Landscape Context

The purpose of this section is to provide contextual environmental information for use in developing a predictive model of Aboriginal site locations associated with or near the Site. Interactions between people and their surroundings are of integral importance in both the initial formation and the subsequent preservation of the archaeological record. The nature and availability of resources, including water, flora and fauna, and suitable raw materials for the manufacture of stone tools and other items had—and continues to have—a significant influence over the way in which people use the landscape.

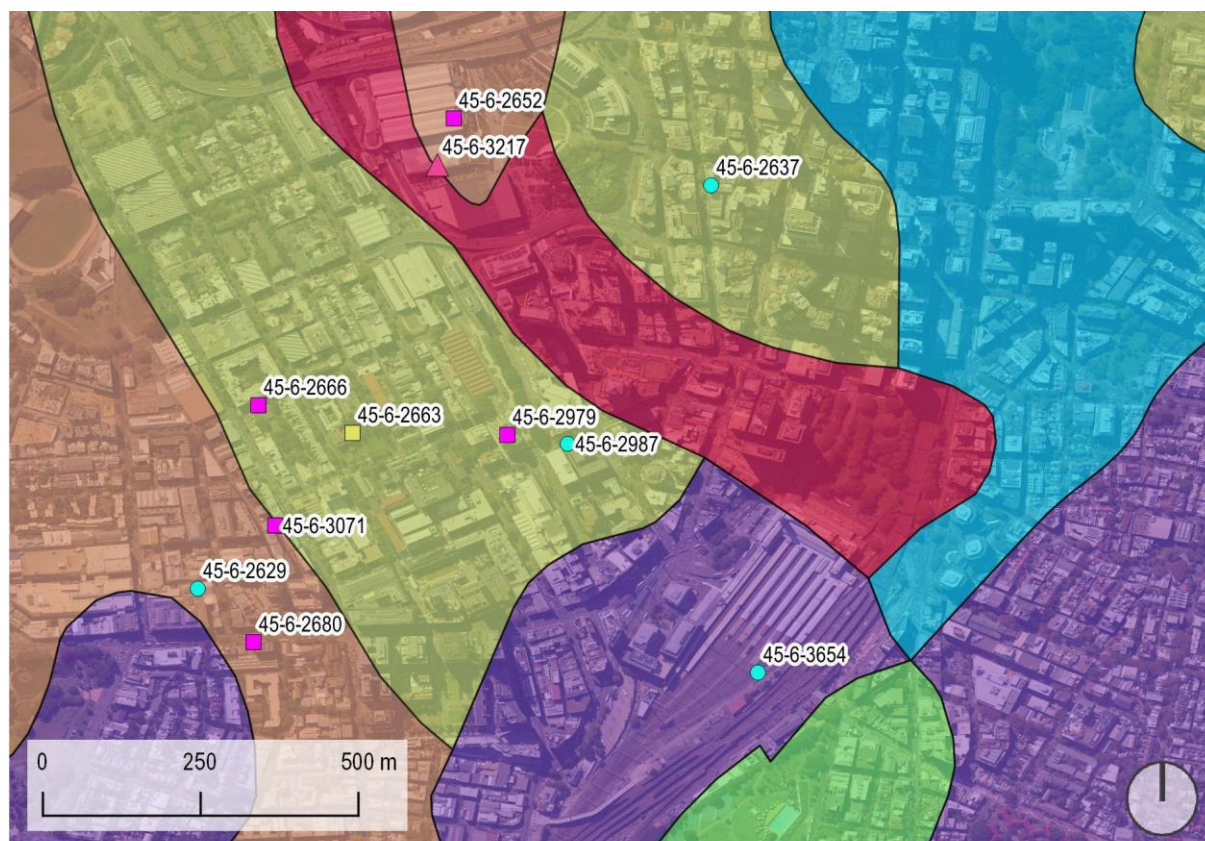
Alterations to the natural environment also impact upon the preservation and integrity of any cultural materials that may have been deposited, while current vegetation and erosional regimes affect the visibility and detectability of Aboriginal sites and objects. For these reasons, it is essential to consider the environmental context as a component of any heritage assessment in detail.

5.1.1 Geology and Soil Landscape

Geology in the Site is dominated by Ashfield Shale (Wianamatta Group). The Site is also near the recorded extent of the Hawkesbury sandstone. Ashfield Shale typically consists of black to dark grey shale, siltstone and laminate, which weathers in the upper zones to produce moderately to highly reactive clays. Hawkesbury sandstone characteristically comprises medium to coarse grained quartz sandstone with some shale and laminate bands or lenses. Interbedded, fine grained sandstone, siltstone and shale of the Mittagong Formation are sometimes encountered between the Ashfield Shale and the underlying Hawkesbury sandstone.⁴

The Site is situated on the Blacktown soil landscape (Figure 5.1). This soil landscape is classed as residual—a product of weathering rock, but with little to no movement (unlike erosional soils), with shallow to moderately deep soils. Blacktown soils are common on rounded crests and ridges.

Soil profiles are explained in terms of horizons (layers), with A horizons usually having potential to contain archaeological evidence. A₁ and A₂ horizons refer to layers of topsoil; on the Blacktown soil landscape these are generally 30–50cm deep. The B horizon is usually a subsoil situated on top of bedrock. An intact A₁ horizon of Blacktown soil usually contains friable, brownish-black loam, while an intact A₂ horizon is typically hard setting brown clay loam. B horizon is typically strong pedal (clumped), mottled brown light clay.⁵



Key

AHIMS Search Results

- ▲ Aboriginal ceremony and Dreaming site
- Artefact site
- Potential archaeological deposit
- Potential archaeological deposit with artefact(s)

Soil Landscape

- BLACKTOWN
- DEEP CREEK
- DISTURBED TERRAIN
- GYMEA
- LUCAS HEIGHTS
- TUGGERAH

Figure 5.1 The soil landscape of the Site, with nearby registered Aboriginal sites marked. (Source: Google Earth with GML overlay)

5.1.2 Hydrology

The Site is within the Darling Harbour catchment and historic plans show several freshwater streams that drained into this area. Aboriginal people occupying the land in the vicinity of the Surry Hills precinct would have had access to a number of freshwater streams that drained to the eastern and western side of the ridge into either the Darling Harbour catchment or the Alexandra Canal catchment to the west.

5.1.3 Flora and Fauna

The original vegetation in Surry Hills reflected the soil and geological landscapes of the region. The area of Central Station, underlain by Ashfield Shale and Blacktown soils, would have supported a forest community of *Angophora costata* and *Eucalyptus pilularis*. This area was the easternmost extent of the Turpentine–Ironbark Forest in the Sydney region.⁶

As in much of the central Sydney region, animal species present around Surry Hills that would have been hunted by Aboriginal people included kangaroos, wallabies, echidnas, emus, goannas and wombats. Marine resources would have been collected from nearby Darling Harbour and Woolloomooloo Bay or other coastal access points.

5.2 Archaeological Context

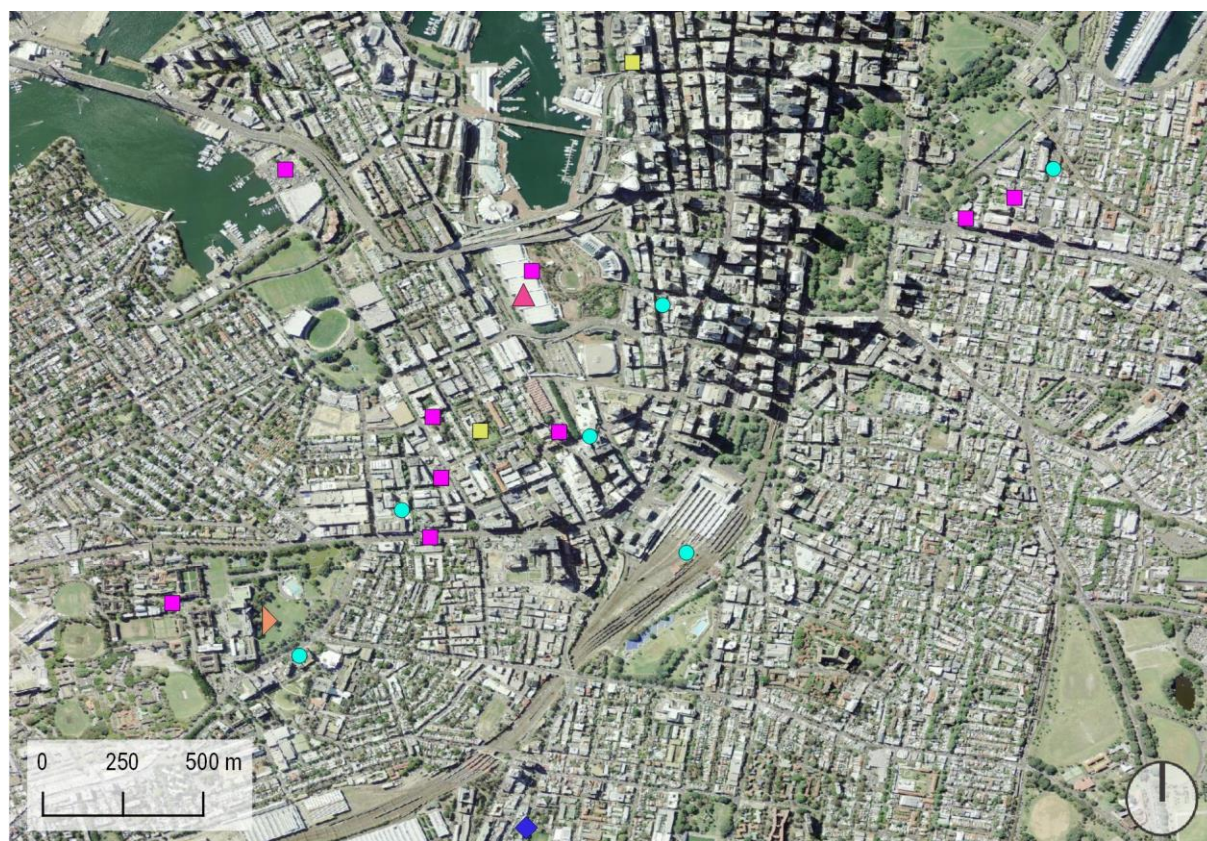
5.2.1 Aboriginal Heritage Information Management System

A search of the OEH AHIMS database for a 1km zone surrounding the Site was carried out on 15 July 2019. The results of the search are shown in Table 5.1 and in Figure 5.2. The search identified that there are artefact sites and potential deposits in close proximity to the Site (Figure 5.3). No Aboriginal sites are registered within the Site. The closest registered Aboriginal site is a Potential Archaeological Deposit (PAD), AHIMS #45-6-3654, located to the southeast of the Site within Central Station. Further information on this archaeological site and the connected work is detailed in Artefact 2019, discussed below.

The lack of AHIMS sites in close proximity to the Site is likely a reflection of the limited investigation of Aboriginal archaeology in the immediate area rather than any meaningful indication of the way the landscape was used by local Aboriginal people. The AHIMS results do, however, demonstrate the range of activities undertaken by Aboriginal people across the Sydney CBD area prior to European settlement and indicate the potential for Aboriginal sites to survive within this landscape despite the impacts of modern developments.

Table 5.1 Results of AHIMS Search.

Site Feature	Frequency	Percentage
Artefact site	6	30
Aboriginal ceremony and Dreaming site	1	4
Aboriginal resource and gathering site	1	4
Midden	1	4
PAD/PAD with artefact(s)	12	58
Total	21	100%



Key

AHIMS Search Results

- | | |
|--|---|
| ▲ Aboriginal ceremony and Dreaming site | ■ Potential archaeological deposit |
| ▶ Aboriginal resource and gathering site | ■ Potential archaeological deposit with artefact(s) |
| ● Artefact site | ◆ Shell midden |

Figure 5.2 Wider context of Aboriginal sites surrounding the Site. (Source: Google Earth with GML overlay)



Key

AHIMS Search Results

- ▲ Aboriginal ceremony and Dreaming site
- Artefact site
- Potential archaeological deposit
- Potential archaeological deposit with artefact(s)

Figure 5.3 Registered AHIMS sites near the Site. (Source: Google Earth with GML overlay)

5.2.2 Relevant Archaeological Studies

A limited number of archaeological investigations have been undertaken within the immediate vicinity of the Site. One of the nearest Aboriginal archaeological investigations undertaken on a similar ridge landform with Ashfield Shale/Blacktown soils was at the University of Sydney in 2004 and 2005 and is discussed below.

Artefact Heritage, 2019—Central Railway Station Artefact Scatter 01 (45-6-3654)

In January 2019, a small artefact site, comprising three artefacts, was uncovered during archaeological investigations between Platforms 12 and 15 at Central Station. The artefacts were recovered from an area containing intact Botany sands. A report of the results has yet to be prepared and limited information on the context of the artefacts was available.

Jo McDonald Cultural Heritage Management, 2004 and 2005—USyd Central (45-6-2822, 45-6-2745)

Jo McDonald Cultural Heritage Management undertook an Aboriginal heritage assessment of a portion of the University of Sydney's Camperdown and Darlington campuses as part of upgrades and

construction during the Campus 2010 Project. A survey was conducted across the Site in 2004 and four areas of PAD were identified.

A program of archaeological testing was implemented at two of these PADs in 2005—the first on the former Geology Lawns (now the site of the Law Building), and the second at Maze Green, adjacent to the Old Darlington School. The Geology Lawns are located on a similar Ashfield Shale/Blacktown soil landscape to the ridge top of the Surry Hills precinct. Testing at the Geology Lawn revealed that moderately disturbed A horizon soil survived below up to 1.6 metres of introduced fill. One piece of flaked silcrete debitage was retrieved from this testing. Test pits on Maze Green, close to the Old Darlington School, revealed sediments that appeared to represent a still, shallow freshwater pond and may be associated with the natural swamp located here prior to significant landscape modification. No artefacts were retrieved from intact soil profiles, although one silcrete artefact was recovered from the disturbed overburden.

Artefact Heritage, 2014—CBD and South East Light Rail Project, Moore Park Tennis Centre Early Works

In 2014, Artefact Heritage undertook a program of Aboriginal archaeological test excavation as part of the Light Rail Project. This comprised the excavation of five pits within the Moore Park tennis courts on the eastern side of Anzac Parade, immediately south of the Land Road intersection, and approximately 1.6km southeast of the Site. The test excavation was located within the Botany Sand Sheet, an extensive quaternary sand deposit that occurs across Sydney's eastern suburbs. Aboriginal objects were recovered from a dark grey sand profile approximately 1m below the modern ground surface, interpreted as the remains of an A₁ soil horizon. Although this study is located in a differing topographic and geological context, it demonstrates the survival of Aboriginal objects across the wider landscape within which the Site is located.

Wendy Thorp Cultural Resources Management, 2001—St Margaret's Hospital Site, Darlinghurst

In 2001, Wendy Thorp undertook historical archaeological excavations at the former St Margaret's Hospital site, an area bounded by Albion Street, Bourke Street and Church Lane.⁷ While this investigation was undertaken for the purpose of investigating historical archaeological remains, it is useful for understanding the potential for deposits bearing Aboriginal objects to survive in a similar context to the Site. The results of this investigation showed that where the remains of mid-late nineteenth-century terraces houses survived, these sat directly on the B horizon clays. No evidence for intact or remnant topsoils was observed across the areas tested.

5.3 Predictive Model of Aboriginal Archaeological Potential

The Aboriginal archaeological potential of Surry Hills varies based on the different ways certain parts of the landscape were used by Aboriginal people and how land has been disturbed by modern activities.

Surry Hills is located away from the coastal focus of most recorded Aboriginal sites. This is likely due to fewer archaeological investigations having occurred here and, hence, a more limited understanding of how these areas were used rather than being a true reflection of the Aboriginal land use. Activities such as stone tool manufacture, resource gathering and processing were likely to have been undertaken in the local area. Landscapes characterised by both Blacktown soils/Ashfield shale and Tuggerah soils/Botany sands are likely to have been used by Aboriginal people, although it is not possible to

determine from the available archaeological background if there are differences in the way the areas were used that would influence the nature of the Aboriginal archaeological record in each area.

The predictive model for the Site is based on the AHIMS data, historic research, and environmental data. Based on this analysis of previous research in the surrounding area, potential Aboriginal archaeology within the Site would most likely be in the form of isolated stone artefacts, potentially in redeposited fill. Whilst the Site has undergone significant historical excavation, the presence of AHIMS site #45-6-3654 within Central Station indicates pockets of Aboriginal archaeology may still remain present in disturbed contexts in the area.

Modern disturbance of the Site associated with recent construction activities will have disturbed and/or completely removed potential Aboriginal archaeological deposits within the western part of the Site. Photographs from 2001 of the excavation of part of the Site for construction of the plaza level shops and Henry Deane Place indicate that the Site was excavated to either clay or bedrock in the southwestern building (Figure 2.11). The impacts of the construction of the other buildings in the eastern half of the Site is unknown but likely to also have removed any intact archaeological deposits. Figure 5.4 maps the Aboriginal archaeological potential of the Site.



Figure 5.4 The Aboriginal archaeological potential across the Site. (Source: NSW Land and Property Information with GML overlay 2019)

6.0 Assessment of Historical Archaeological Potential

6.1 Overview

This section assesses the Site's potential to contain significant historical archaeological remains and identifies the impacts resulting from the proposed redevelopment. The assessment of archaeological potential is based on examination of historical information related to the Site's development and occupation, current Site conditions and previous disturbance, and comparable archaeological studies to identify the archaeological potential of the Site. The significance of the potential archaeology is assessed by considering its research potential and value within the NSW heritage criteria framework.

6.1.1 Archaeological Potential

The term 'archaeological potential' is the likelihood that a Site may contain physical evidence related to an earlier phase of occupation, activity or development. Archaeological potential is usually described as low, moderate or high, and is assessed as follows:

- Low—it is unlikely that archaeological evidence associated with this historical phase or feature survives.
- Moderate—it is possible that some archaeological evidence associated with this historical phase or feature survives. If archaeological remains survive, they may have been subject to some disturbance.
- High—it is likely that archaeological evidence associated with this historical phase or feature survives intact.

6.1.2 Archaeological Significance

Archaeological significance refers to the heritage significance of known or potential archaeological remains. In NSW, archaeological remains are managed in accordance with their assessed levels of significance in line with *Assessing Significance for Historical Archaeological Sites and 'Relics'*, published by the NSW Heritage Branch (now Heritage Division, OEH) in 2009.

Archaeological significance and 'relics' in NSW are defined as being either locally or state significant.

6.2 Historical Development

The following discussion focuses on the potential subsurface archaeological remains such as structural elements, occupational deposits, yards and paths in relation to the historic phases of development and use within the Site.

The following three main phases of historical development have been identified:

- Phase 1: Town Limits Gateway (1788–1820).
- Phase 2: Development of the Railway and Expansion (1821–1900).
- Phase 3: Changing Use and the New Millennium (1901–2019).

6.2.1 Phase 1: Town Limits Gateway

Early plans of the area show no information to suggest that the Site was formally occupied before 1818. In 1818 the Site was delineated as Government Paddocks, which may or may not have been fenced. Other developments in the broader area, such as the Brickfields, did not have a direct impact on the Site. The Benevolent Asylum was constructed in 1821 north of the current Site within the Western Forecourt of Central Station. No known plans indicate that structures were ever present within the Site relating to this phase of its history. If present, archaeological deposits from this period could include early phases of George Street (Lee Street), isolated artefacts, rubbish pits, boundary fence lines and paths relating to the yard and garden areas of the asylum.

6.2.2 Phase 2: Development of the Railway and Expansion

The grounds of the Benevolent Asylum were curtailed several times for the extension of Devonshire Street and George Street. The 1853 expansion of the Sydney Terminus impinged on the grounds of the asylum with the current subject Site included in land excised from the Asylum grounds.

The Goods Line was constructed in 1855 and is still present within the Site. The portion of the Goods Line within the Site has undergone substantial modification due to the construction of Henry Deane Place yet is still in its original alignment.

The Western Yard was also constructed at this time within the Site including two rail sheds. These were subsequently demolished and replaced by the Western Carriage Shed and Inwards Parcels Dock along with other offices and workshops in the early twentieth century. Construction of Henry Deane Place in 1998–2000 completely removed these structures.

The Central Station CMP⁸ states that there is no potential for archaeological remains of the Inwards Parcels Dock, Western Carriage Shed, Support Offices, Demountable Workshops or stores buildings to be present within the footprint of the current Site. If present, the only archaeological potential would consist of historical fills used to landscape the Site for the construction of the Western Yard.

6.2.3 Phase 3: Changing Use and the New Millennium

The Site is currently occupied by Henry Deane Plaza and surrounding office buildings. No archaeological potential exists from this phase.

6.3 Relevant Archaeological Studies

Wendy Thorp Cultural Resources Management, 1998—Archaeological Assessment Henry Deane Park, Lee Street, Sydney

An archaeological assessment was prepared by Wendy Thorp in advance of construction of the existing Henry Deane Place in 1998. The assessment identified that the Site had limited potential for mid–late nineteenth century archaeological remains of railway infrastructure due to extensive redevelopment of the Site in the early twentieth century. While the report identified the potential for remains of early twentieth century railway buildings, any remains were anticipated to be highly fragmentary and have low heritage significance. The report concluded that no further work to mitigate impacts to potential archaeological remains was required.

Wendy Thorp Cultural Resources Management, 1999—Archaeological Assessment, Northern Concourse, Central Station Sydney

This included excavations to investigate the potential for the Devonshire Street Cemetery to remain below the Northern Concourse of Central Station. The report found no evidence of burials, headstones, fences or boundary walls relating to the cemetery and concluded that it had been extensively exhumed.

Geotechnical results from the excavation demonstrated that over 3m of fill, concrete slabs and modern debris from the construction of Central Station overlay the area and likely precluded the presence of archaeological deposits within the Site.

Artefact Heritage, 2018—Central Station Main Works: Station Box and Sydney Yard Archaeological Method Statement

Archaeological investigations and geotechnical testing in the Sydney Yard for the Central Station Metro construction further confirmed Wendy Thorp's Northern Concourse findings (detailed above) that extensive historic fill underlies the current ground surface of Central Station.

Rappoport and NSW Government Architect's Office, 2013—Conservation Management Plan

The CMP breaks Central Station into precincts. The current Site is within Precinct 1, the Western Yard. The CMP states that the construction of Henry Deane Place in 1998–2000 completely removed any potential archaeological evidence relating to the Inwards Parcels Dock, the Western Carriage Shed, the Support Offices, Demountable Workshops and the stores. It does not discuss earlier phases of the Site's development.

AMAC Group, 2016—Archaeological Assessment and s60 Permit Application, Chalmers Street Substation

Excavations directly northwest of the Site on Lee Street were carried out to investigate remnant brick footings of a turntable and platforms relating to the extension of the Second Station in the 1880s. The stratigraphic evidence from the Site suggests that evidence of the First and Second Stations was evident under shallow modern fill.

Casey and Lowe, 2009—Archaeological Testing, Western Forecourt, Central Station

Archaeological test excavations carried out in the Western Forecourt north of the Site indicated that evidence of the Benevolent Asylum and the Christ Church St Laurence Parsonage were present beneath topsoil and several layers of demolition fill. The demolition layer was less than 1m below the modern surface and was up to half a metre deep in some areas. Cut sandstone deposits, possibly representing landscaping of the area before the construction of the Benevolent Asylum in 1821, were present directly above remnant deposits of Botany Sand.

6.4 Analysis of Site Disturbance

The construction of Henry Deane Plaza in 1998 resulted in extensive remodification of the Site. A photograph taken during works in the western half of the Site (Figure 2.11) shows that this area had been cut down to bedrock, a process that will have removed any archaeological remains. The extent of impacts to the eastern half of the Site is not known, but will have also had a major impact on the survival of archaeological remains.

6.5 Statement of Historical Archaeological Potential

Overall, the Site is assessed as having low potential for historical archaeological remains. The identified phases of historical use and occupation of the Site suggest that, if present, archaeological features have nil to low potential to be extant beneath the current ground surface under the existing buildings abutting Central Station and nil potential within the Devonshire Tunnel and western building (Figure 6.1 and 6.2). The substantial redevelopment of the Site in 1998 has likely removed all potential for evidence relating to the use of the Site as the Western Yards and there is minimal chance of ephemeral evidence relating to the use of the Site by the Benevolent Asylum. However, several excavations in proximity to the Site and within the Sydney CBD suggest that pockets of historical archaeology may be present under historical fill imported for the construction of Central Station.

Analysis of the historical use of the Site and the disturbance of the Site are combined in the table below to summarise the potential for archaeological remains from each phase of occupation of the Site.

Table 6.1 Potential Historical Archaeological Remains Likely to be Present within the Site.

Phase	Possible Archaeological Remains	Potential
Phase 1: Town Limits Gateway (1788–1820)	<ul style="list-style-type: none"> • Postholes from boundary fences. • Isolated artefacts or rubbish pits located at the former city limits. • Early alignment of Devonshire Street and George Street. • Kerbs, drains, culverts. 	Nil
Phase 2: Development of the Railway and Expansion (1821–1900)	<ul style="list-style-type: none"> • Pockets of discarded rail infrastructure. • Fills relating to the construction and expansion of Central Station and the Western Yard. 	Low
Phase 3: Changing Use and the New Millennium (1901–2019)	<ul style="list-style-type: none"> • Brick footings of early twentieth-century buildings. • Remains of services and other infrastructure. 	Low

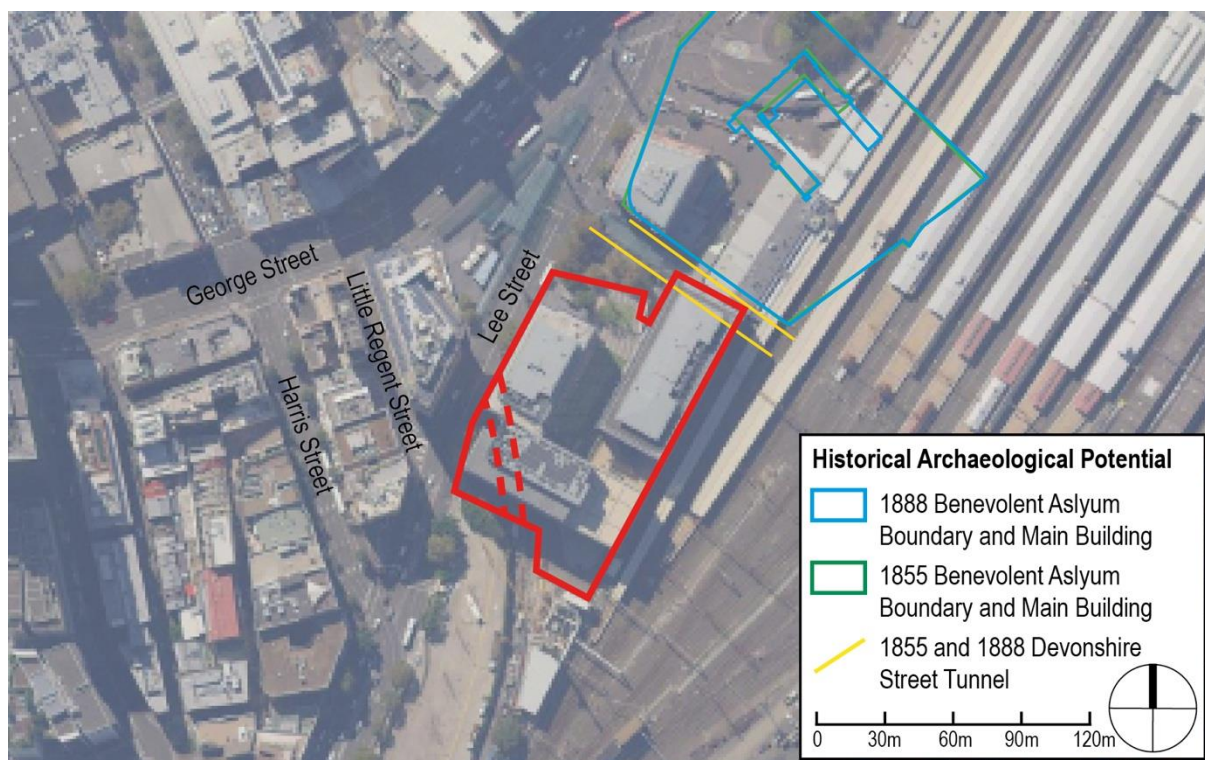


Figure 6.1 Modern aerial with 1855 and 1888 overlay showing the boundary of the Benevolent Asylum falling just beyond the Site boundary. (Source: Six Maps with GML overlay)



Figure 6.2 Plan showing assessed areas of historical archaeological potential within the Site. (Source: Six Maps with GML overlay)

6.6 Assessment of Archaeological Significance

This significance assessment specifically considers the historical archaeological resource of the Site and is presented in Table 6.2 below. Archaeological remains of the mid-nineteenth through to twentieth century railway infrastructure are not considered to meet the threshold for local significance under any of the criteria.

Table 6.2 Assessment of Potential Archaeological Remains within the Site against the NSW Heritage Criteria.

Criterion	Response
<i>(a) an item is important in the course, or pattern, of NSW's cultural or natural history (or the local area)</i>	<p>Although Central Station represents a significant aspect of the history of Sydney's rail network, the potential archaeological remains are unlikely to contribute to our understanding or appreciation of the wider historical importance the place.</p> <p>Archaeological evidence would not meet the threshold for significance against this criterion.</p>
<i>(b) an item has a strong or special association with the life or works of a person, or group of persons, of importance in NSW's cultural or natural history (or the local area)</i>	<p>No significant associations were identified in relation to the anticipated historical archaeological resource.</p> <p>Archaeological evidence would not meet the threshold for local significance under this criterion.</p>
<i>(c) an item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (or the local area)</i>	<p>The anticipated historical archaeological remains are expected to be highly fragmentary and unlikely to demonstrate aesthetic or technical achievement.</p> <p>Archaeological evidence would not meet the threshold for local significance under this criterion.</p>
<i>(d) an item has strong or special association with a particular community or cultural group in NSW for social, spiritual or cultural reasons (or the local area)</i>	<p>While railway heritage is valued by sectors of the community, there is no evidence for strong associations by the community to this Site.</p> <p>Archaeological evidence would not meet the threshold for local significance under this criterion.</p>
<i>(e) an item has potential to yield information that will contribute to an understanding of NSW's cultural or natural history (or the local area)</i>	<p>Archaeological remains are likely to be limited to fragmentary rail infrastructure such as rail tracks, truncated building footings, services and levelling fills. Such remains have little potential to yield new information regarding the historic development of Central Station as a major rail hub of the Sydney train network.</p> <p>Archaeological evidence would not meet the threshold for local significance under this criterion.</p>
<i>(f) an item possesses uncommon, rare or endangered aspects of NSW's cultural or natural history (or the local area)</i>	<p>The archaeological remains are not considered to be rare or uncommon within the context of Sydney's cultural or natural history.</p> <p>Archaeological evidence would not meet the threshold for local significance under this criterion.</p>
<i>(g) an item is important in demonstrating the principal characteristics of a class of NSW's cultural or natural places or cultural or natural environments (or the local area)</i>	<p>The archaeological remains are expected to be fragmented and would have little potential to demonstrate the principal characteristics of Sydney's rail network.</p> <p>Archaeological evidence would not meet the threshold for local significance under this criterion.</p>

7.0 Archaeological Impact Assessment

7.1 Summary of Proposed Works

The redevelopment of the Site at 14–30 Lee Street, Haymarket would involve demolition of the existing buildings and excavation of the Site. No specific designs for future development have been assessed in this report.

7.2 Potential Archaeological Impacts

The redevelopment is unlikely to impact on Aboriginal sites or objects. The assessment has identified that archaeological remains that may survive within the Site do not meet the threshold for local significance. As such the works are not considered likely to have an impact on potential archaeological remains.

7.3 Approvals and Mitigation Measures

The Site is unlikely to contain Aboriginal sites or objects or significant historical archaeological remains. Therefore, the redevelopment of the site is not unlikely to have any impacts on Aboriginal or Historical archaeological remains. Recommendations regarding unexpected finds are detailed in Section 8.0.

8.0 Conclusions and Recommendations

This AA has identified and assessed the impacts of the proposed rezoning on the Site's potential historical and Aboriginal archaeological resource. The Site is assessed as having a low to nil potential to contain Aboriginal sites and/or objects based on a review of the historical and environmental context, predictive modelling and past developments that have impacted on the survival of intact deposits. This assessment has also identified that there is low to nil potential for historical archaeological remains of later nineteenth and twentieth century rail infrastructure.

The proposed rezoning is not considered to have an impact on the Site's archaeological resource and any mitigation measures can be managed through the development application process.

8.1 Recommendations

- The following measures should be considered as part of a mitigation program to be developed during any future development applications for works within the Site.
 - An unexpected finds procedure should be developed that provides a process for managing any Aboriginal sites and/or objects, or historical archaeological remains that may be uncovered during future works.
 - All workers should be informed of their responsibilities under the NPW Act and Heritage Act. A heritage induction should be conducted by a suitably qualified archaeologist.
 - Heritage Interpretation should be incorporated into any future developments. This should be implemented through the preparation of an Interpretation Plan that identifies opportunities for the presentation of the Indigenous and non-indigenous history of the Site and wider area.

9.0 Endnotes

- ¹ Office of Environment and Heritage 2012, 'Regulations of Aboriginal cultural heritage', viewed 5 April 2017 <<http://www.environment.nsw.gov.au/licences/achregulation.htm>>.
- ² Department of the Environment, Climate Change and Water, April 2009, *Due diligence guidelines for protection of Aboriginal objects in NSW*.
- ³ Department of the Environment, Climate Change and Water, NPWS Act 1974, *Fact sheet 2*, September 2010.
- ⁴ Douglas Partners, Proposed Mixed Use Development 23–47 Flinders Street, Surry Hills Geotechnical Investigation, report prepared for Midson Group Pty Ltd, December 2017.
- ⁵ Chapman, G et al. 1989, *Soil Landscapes of the Sydney 1:100 000 Sheet*, Soil Conservation Service of NSW, Sydney, pp 20–33.
- ⁶ Benson, D and Howell, J 1990, *Taken for Granted: The Bushland of Sydney and its Suburbs*, Kangaroo Press in association with the Royal Botanic Gardens Sydney, Sydney, pp 43–44.
- ⁷ Cultural Resources Management, The Investigation of Archaeological Evidence—St Margaret's Hospital Site, Darlinghurst, report prepared for Summit Projects Australia Pty Ltd, March 2002.
- ⁸ Rappoport and Government Architect's Office NSW, Central Station Conservation Management Plan, report prepared for RailCorp, June 2013.