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URBIS

HISTORICAL ARCHAEOLOGICAL IMPACT ASSESSMENT

Toga Central, 2 & 8A Lee Street
Sydney NSW

Prepared for

TOGA DEVELOPMENT & CONSTRUCTION

23rd November 2022

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EXECUTIVE SUMMARY

Urbis has been engaged by TOGA Development & Construction (TOGA) ('the proponent') to conduct an Historical Archaeological Impact Assessment (HAIA) to accompany a detailed State Significant Development (SSD) Development Application (DA) for the mixed-use redevelopment proposal at TOGA Central, located at 2 & 8A Lee Street, Haymarket ('the subject site'). The site is legally described as Lot 30 in Deposited Plan 880518, Lot 13 in Deposited Plan 1062447, and part of Lot 14 in Deposited Plan 1062447. The site is also described as 'Site C' within the Western Gateway sub-precinct at the Central Precinct.

This report has been prepared to address the Secretary's Environmental Assessment Requirements (SEARs) issued for the SSD DA (SSD 33258337).

This report concludes that the proposed mixed-use redevelopment is suitable and warrants approval subject to the implementation of the following mitigation measures.

The HAIA has been undertaken as an investigation of historical archaeological potential within the subject site, and to investigate the likelihood that the proposed works would impact potential archaeological resources. The HAIA included the following:

- Historical research on the place, to be informed by existing historical research from previous reporting and supplemented where necessary.
- Searches of statutory and non-statutory heritage listings.
- A physical survey of the subject site.
- Analysis of relevant archaeological assessments.
- Assessment of archaeological potential.
- Assessment of archaeological significance.
- Assessment of potential archaeological impacts associated with the proposal.
- Provision of recommendations for the management of archaeological significance.

The HAA has concluded the following in relation to the historical archaeological potential and significance of the subject site:

- The subject site has **nil-low** potential to contain archaeological relics associated with early phases of occupation at the subject site, including initial settlement and the Benevolent Society.
- The subject site has **low-moderate** potential to contain archaeological resources associated with the later phases of occupation at the site, including Central Railway Station and the former Parcels Post Building. Extant structures have likely removed any previously accumulated deposits through high levels of disturbance.
- Archaeological resources associated with the Benevolent Asylum, which are unlikely to occur although some resources may be retained in the form of structural remains in the north-eastern portion of the site, may be considered of State significance for their association with the first Benevolent Asylum and the development of social welfare services.
- Archaeological resources associated with the Central Railway Station, being structural remains of the West Carriage Shed, are unlikely to occur. If these resources are present, they would likely be considered significance on a Local level for their association with the historic development of Central Railway Station.
- The proposed works are unlikely to impact historical archaeological relics due to the high levels of disturbance which have occurred previously at the site and are likely to have removed previously accumulated deposits. Should relics occur, proposed basement excavation to RL 0.900 (15.1m) will result in the removal of these relics.

In view of the above conclusions, Urbis makes the following recommendations:

Recommendation 1– Unexpected Finds Procedure

For proposed surface disturbance the following Unexpected Finds Procedure should be implemented. This should be included in the Construction Management Plan for the site and all contractors should be made aware of this procedure.

1. All works must stop in the immediate vicinity of the find. The find must remain undisturbed and temporary fencing established around the find.
2. The Site Supervisor, or another nominated site representative must contact an appropriately qualified archaeologist.
3. The archaeologist should examine the find, provide a preliminary assessment of significance based on the findings of this HAIA, record the item and decide on an appropriate management strategy as identified in Section 6. Heritage NSW should be notified of the identification of the find by the archaeologist, through the submission of a Section 146 notification on the Heritage Management System (HMS).
4. Depending on the significance of the find, re-assessment of the archaeological potential of the area may be required, and further archaeological investigation required.
5. Works in the vicinity of the find can only recommence upon on the written advice of the archaeologist.

Recommendation 2 – Archaeological Induction

Prior to the commencement of works, an archaeological induction should be delivered by Urbis to all relevant construction personnel for the purpose of establishing:

- heritage obligations of all project personnel;
- how to identify archaeological relics of State or local significance;
- what to do in the event that potential relics are uncovered; and
- how the Unexpected Finds Procedure works in practice.

Following the implementation of the above mitigation measures, the remaining impacts are appropriate.

1. INTRODUCTION

Urbis has been engaged by TOGA Development & Construction (TOGA) ('the proponent') to conduct an Historical Archaeological Impact Assessment (HAIA) to support a SSD DA (SSD-33258337) for the proposed redevelopment of 2 & 8A Lee Street, Haymarket NSW legally referred to as Lot 30 in DP 880518, Lot 13 in DP 1062447, and part of Lot 14 in Deposited Plan 1062447 ('the subject site') (Figure 2 and Figure 3).

The Minister for Planning, or their delegate, is the consent authority for the SSD DA and this application is lodged with the NSW Department of Planning and Environment (DPE) for assessment

The purpose of the HAIA is to investigate the historical archaeological potential within the subject site and the likelihood that the proposed works would impact potential archaeological resources.

1.1. SUBJECT SITE

The subject site is located within the City of Sydney Local Government Area (LGA). The subject site is situated 1.5km south of the Sydney CBD and 6.9km north-east of the Sydney International Airport within the suburb of Haymarket.

The subject site is located within the Western Gateway sub-precinct, an area of approximately 1.65ha that is located immediately west of Central Station within Haymarket on the southern fringe of the Sydney CBD. Immediately north of Central Station is Belmore Park, to the west is Haymarket (including the University of Technology, Sydney and Chinatown), to the south and east is rail lines and services and Prince Alfred Park and to the east is Elizabeth Street and Surry Hills.

Central Station is a public landmark, heritage building, and the largest transport interchange in NSW. With regional and suburban train services, connections to light rail, bus networks and to Sydney Airport, the area around Central Station is one of the most-connected destinations in Australia.

The subject site is located at 2 & 8A Lee Street, Haymarket and is legally described as Lot 30 in Deposited Plan 880518, Lot 13 in Deposited Plan 1062447 and part of Lot 14 in Deposited Plan 1062447.

The land that comprises the site under the Proponent's control (either wholly or limited in either height or depth) comprises a total area of approximately 4,159sqm. The subject site is on the traditional lands of the Gadigal people, and within the catchment of the Metropolitan Local Aboriginal Land Council (MLALC).

The location of the TOGA Central site is illustrated in Figure 1.

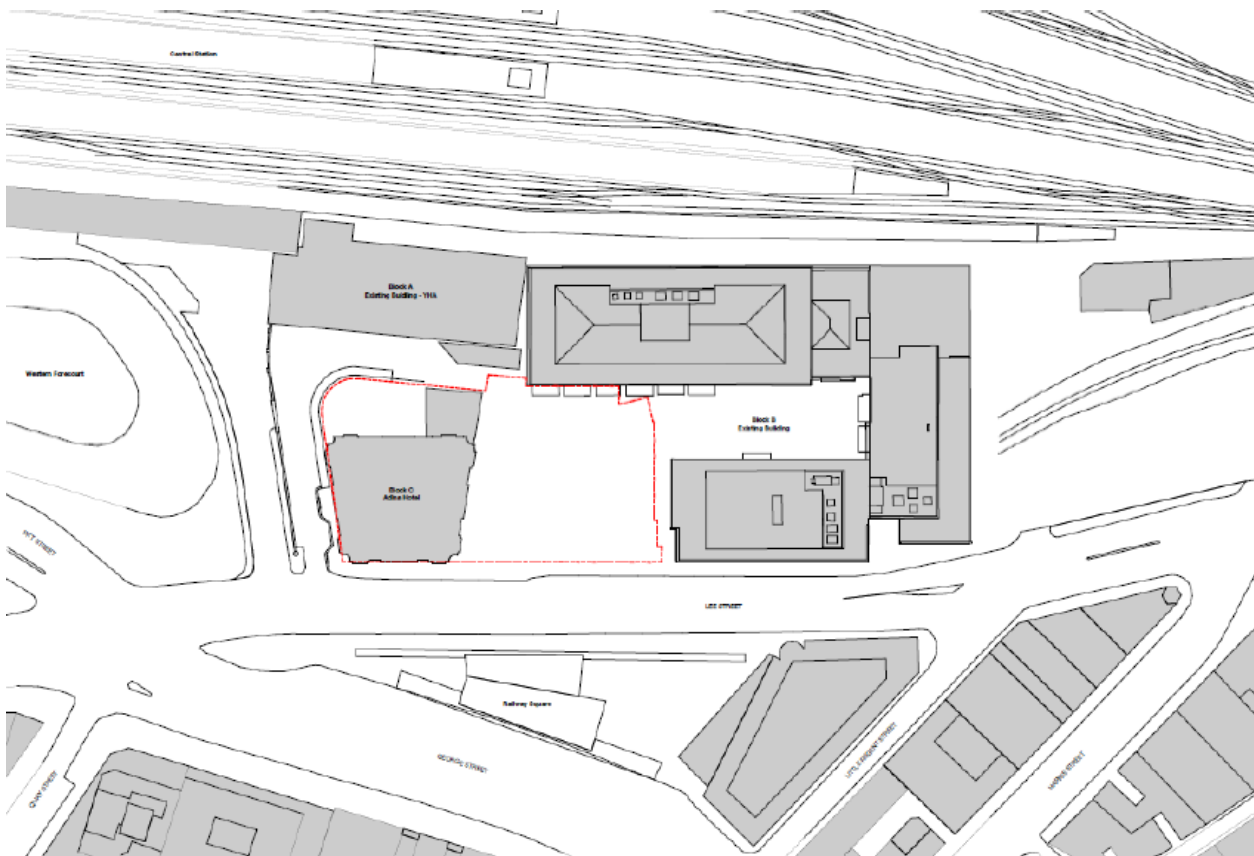


Figure 1 – Site Identification Plan with subject site outlined in red.

Source: Bates Smart, 2022

The subject site currently comprises the following existing development:

- Lot 30 in Deposited Plan 880518 (Adina Hotel building): the north-western lot within the Western Gateway sub-precinct accommodates a heritage-listed building which was originally developed as the Parcels Post Office building. The building has been adaptively re-used and is currently occupied by the Adina Hotel Sydney Central. The eight-storey building provides 98 short-stay visitor apartments and studio rooms with ancillary facilities including a swimming pool and outdoor seating at the rear of the subject site.
- Lot 13 in Deposited Plan 1062447 (Henry Deane Plaza): the central lot within the Western Gateway sub-precinct adjoins Lot 30 to the south. It accommodates 22 specialty food and beverage, convenience retail and commercial service tenancies. The lot also includes publicly accessible space which is used for pop-up events and a pedestrian thoroughfare from Central Station via the Devonshire Street Tunnel. At the entrance to Devonshire Street Tunnel is a large public sculpture and a glazed structure covers the walkway leading into Railway Square. This area forms part of the busy pedestrian connection from Central Station to Railway Square and on to George and Pitt Streets, and pedestrian subways.

The subject site is listed as an item of local significance under Schedule 5 of the Sydney Local Environmental Plan 2012 'Former Parcels Post Office including retaining wall, early lamp post and building interior', Item 855.

The subject site is also included within the Central Railway Station State heritage listing. This is listed on the State Heritage Register 'Sydney Terminal and Central Railway Station Group', Item SHR 01255, and in Schedule 5 of the Sydney Local Environmental Plan 2012 'Central Railway Station group including buildings, station yard, viaducts and building interiors' Item 824.

The subject site is not however listed independently on the State Heritage Register. There is an array of built forms that constitute Central Station, however the Main Terminal Building (particularly the western frontage) and associated clocktower constitute key components in the visual setting of the Parcel Post building.

1.2. PROPOSED WORKS

The purpose of the SSD DA is to complete the restoration of the heritage-listed building on the subject site, delivery of new commercial floorspace and public realm improvements that will contribute to the realisation of the Government's vision for an iconic technology precinct and transport gateway. The application seeks consent for the conservation, refurbishment and adaptive re-use of the Adina Hotel building (also referred to as the former Parcel Post building (fPPb)), construction of a 45-storey tower above and adjacent to the existing building and delivery of significant public domain improvements at street level, lower ground level and within Henry Deane Plaza. Specifically, the SSD DA seeks development consent for:

- Site establishment and removal of landscaping within Henry Deane Plaza.
- Demolition of contemporary additions to the fPPb and public domain elements within Henry Deane Plaza.
- Conservation work and alterations to the fPPb for retail premises, commercial premises, and hotel and motel accommodation. The adaptive reuse of the building will seek to accommodate:
 - Commercial lobby and hotel concierge facilities.
 - Retail tenancies including food and drink tenancies and convenience retail with back of house areas.
 - 4 levels of co-working space.
 - Function and conference area with access to level 6 outdoor rooftop space.
 - Reinstatement of the original fPPb roof pitch form in a contemporary terracotta materiality.
- Provision of retail floor space including a supermarket tenancy, smaller retail tenancies, and back of house areas below Henry Deane Plaza (at basement level 1 (RL12.10) and lower ground (RL 16)).
- Construction of a 45-storey hotel and commercial office tower above and adjacent to the fPPb. The tower will have a maximum building height of RL 202.28m, and comprise:
 - 10 levels of hotel facilities between level 10 – level 19 of the tower including 204 hotel keys and 2 levels of amenities including a pool, gymnasium and day spa to operate ancillary to the hotel premises. A glazed atrium and hotel arrival is accommodated adjacent to the fPPb, accessible from Lee Street.
 - 22 levels of commercial office space between level 23 – level 44 of the tower accommodated within a connected floor plate with a consolidated side core.
 - Rooftop plant, lift overrun, servicing and BMU.
- Provision of vehicular access into the subject site via a shared basement, with connection points provided to both Block A (at RL 5) and Block B (at RL5.5) basements. Primary access will be accommodated from the adjacent Atlassian site at 8-10 Lee Street, Haymarket, into 4 basement levels in a split-level arrangement. The basement will accommodate:
 - Car parking for 106 vehicles, 4 car share spaces and 5 loading bays.
 - Hotel, commercial and retail and waste storage areas.
 - Plant, utilities and servicing.
- Provision of end of trip facilities and 165 employee bicycle spaces within the fPPb basement, and an additional 71 visitor bicycle spaces within the public realm.
- Delivery of a revitalised public realm across the subject site that is coordinated with adjacent development, including an improved public plaza linking Railway Square (Lee Street), and Block B (known as 'Central Place Sydney'). The proposal includes the delivery of a significant area of new publicly accessible open space at street level, lower ground level, and at Henry Deane Plaza, including the following proposed elements:
 - Provision of equitable access within Henry Deane Plaza including stairways, ramp access and a publicly accessible lift.
 - Construction of an elevated pavilion within Henry Deane Plaza at RL21.

- Landscaping works within Henry Deane Plaza and along Lee Street.
- Utilities and service provision.
- Realignment of lot boundaries.

1.3. METHODOLOGY

This report has been prepared in response to the requirements contained within the Secretary's Environmental Assessment Requirements (SEARs) dated 17 December 2021 and issued for the SSD DA. Specifically, this report has been prepared to respond to SEARs item 21 which is listed in Table 1 below.

Table 1 – SEARs requirements

Item	Description of Requirement	Section reference (this report)
21. <i>Environmental Heritage</i>	Where there is potential for direct or indirect impacts on the heritage significance of environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (if potential impacts to archaeological resources are identified), prepared in accordance with the relevant guidelines, which assesses any impacts and outlines measures to ensure they are minimised and mitigated.	This Archaeological Assessment

The HAIA has been undertaken in accordance with the principles and guidelines of *The Burra Charter*, *The Australia ICOMOS Charter for Places of Cultural Significance* (Australia ICOMOS Incorporated, 2013) ('Burra Charter') and as described in the following publications:

- *NSW Heritage Manual* (Heritage Office and Department of Urban Affairs and Planning, 1996).
- *Archaeological Assessments* (Heritage Office and Department of Urban Affairs and Planning, 1996).
- *Assessing Significance for Historical Archaeological Sites and 'Relics'* (Heritage Branch of the Department of Planning, 2009).
- *Historical Archaeology Code of Practice* (Heritage Office of the Department of Planning, 2006).

The HAIA included the following:

- Historical research on the place, to be informed by existing historical research from previous reporting and supplemented where necessary.
- Searches of statutory and non-statutory heritage listings.
- A physical survey of the subject site.
- Analysis of relevant archaeological assessments.
- Assessment of archaeological potential.
- Assessment of archaeological significance.
- Assessment of potential archaeological impacts associated with the proposal.
- Provision of recommendations for the management of archaeological significance.

1.4. AUTHORSHIP

The present report has been prepared by Alexandra Ribeny (Consultant Archaeologist) and Meggan Walker (Senior Consultant Archaeologist) with review and quality control undertaken by Balazs Hansel (Director).

Alexandra Ribeny holds a Bachelor of Arts (Honours - First Class in Archaeology) from the University of Sydney and a Master of Archaeological Science from the Australian National University and is currently a PhD candidate at the Australian National University.

Meggan Walker holds a Bachelor of Arts (Honours - First Class in Archaeology) from the University of Sydney.

Balazs Hansel holds a Masters (History) and Masters (Archaeology and Museum Studies) from the University of Szeged (Hungary) and is currently completing a PhD (Archaeology) at the University of Sydney.

1.5. LIMITATIONS

This report is limited to a presentation and analysis of potential impacts on the historical archaeological (non-Aboriginal) potential only. The assessment of archaeological potential is limited specifically to the subject site as identified by the red polygon in Figure 5.

No intrusive archaeological methods including archaeological test excavation have been applied for the purposes of this report.

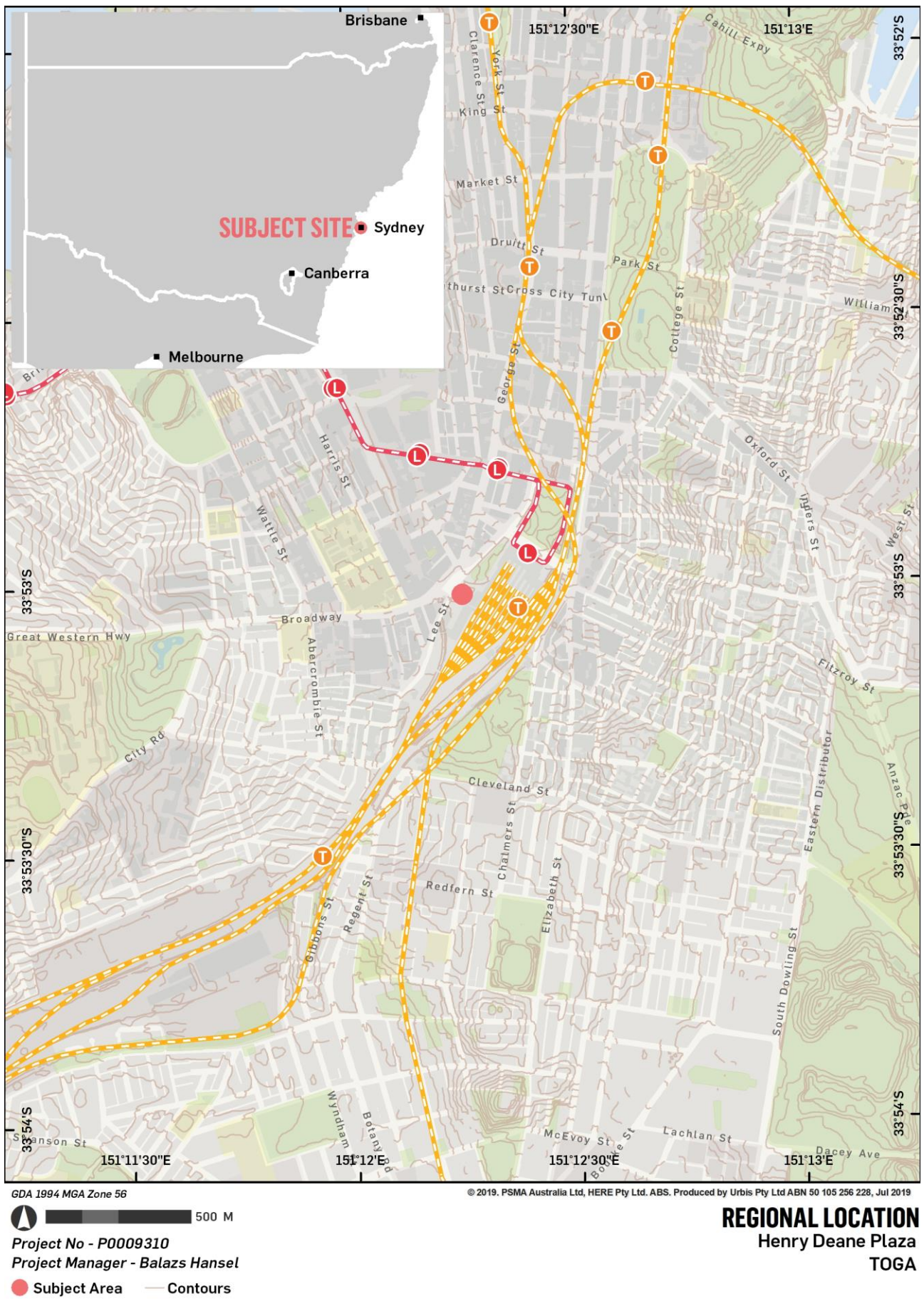


Figure 2 – Regional location of the subject site



GDA 1994 MGA Zone 56

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Project No: P0009615

Project Manager: Balazs Hansel

 Subject Area — Contours

Location of the Subject Area

2-26 Lee Street, Haymarket

TOGA

Figure 3 – Location of the subject site

2. STATUTORY CONTEXT

2.1. NATIONAL LEGISLATION

Environment Protection and Biodiversity Conservation Act 1999

In 2004, a new Commonwealth heritage management system was introduced under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The National Heritage List (NHL) was established to protect places that have outstanding value to the nation. The Commonwealth Heritage List (CHL) was established to protect items and places owned or managed by Commonwealth agencies. The Australian Government Department of Sustainability, Environment, Water, Population and Communities (DSEWPC) is responsible for the implementation of national policy, programs and legislation to protect and conserve Australia's environment and heritage and to promote Australian arts and culture. Approval from the Minister is required for controlled actions which will have a significant impact on items and places included on the NHL or CHL.

Commonwealth Heritage List

The (CHL) was established by the EPBC Act to protect Indigenous, historic, and natural heritage places owned or controlled by the Australian Government. The CHL and EPBC Act contain provisions for the management and protection of listed places under Commonwealth ownership or control. There are no items on the Commonwealth Heritage List within the study area. As such, the heritage provisions of this act do not apply, and project works for the Proposal would not require referral to the Minister.

The subject site does not contain, nor is it located within proximity of, any items which are listed on the CHL.

National Heritage List

The National Heritage List (NHL) was established by the EPBC Act to protect places of significant natural or cultural heritage value at a National level. The EPBC Act requires NHL places to be managed in accordance with the National Heritage Management Principles. Under sections 15B and 15C of the EPBC Act, a referral must be made to the Department of the Environment and Energy for actions that are likely to have a significant impact on National Heritage listed properties. There are no items listed on the National Heritage List within the study area. As such, the heritage provisions of this act do not apply, and project works for the Proposal would not require referral to the Minister.

The subject site does not contain, nor is it located within proximity of, any items which are listed on the NHL.

2.1.1. State Legislation

New South Wales Heritage Act 1977

The NSW *Heritage Act 1977* (the Heritage Act) provides protection to items of environmental heritage in NSW. This includes places, buildings, works, relics, moveable objects and precincts identified as significant based on historical, social, aesthetic, scientific, archaeological, architectural, cultural or natural values. State significant items listed on the NSW State Heritage Register (SHR) are given automatic protection under the Heritage Act against any activities that may damage an item or affect their heritage significance.

Under Section 57(1) of the Heritage Act, Heritage Council approval is required to move, damage, or destroy a relic listed on the State Heritage Register, or to excavate or disturb land which is listed on the SHR and there is reasonable knowledge or likelihood of relics being present.

The Act defines a 'relic' as:

*any deposit, artefact, object or material evidence that—
relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement, and
is of local or state significance.*

Under Section 139 of the Heritage Act, an excavation permit is required to 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*". Under legislative changes in 2022, a Section 139(4) may be sought for certain exempt activities which result in ground disturbance not resulting in the

removal of Local or State significant relics. A Section 139(4) requires assessment by a suitably qualified archaeologist but does not require approval from Heritage NSW.

This section of the Heritage Act identifies provisions for items /relics outside of those on the SHR or subject to an Interim Heritage Order (IHO).

State Heritage Register

The Heritage Act is administered by the Office of Environment and Heritage. The purpose of the *Heritage Act 1977* is to ensure cultural heritage in NSW is adequately identified and conserved. Items of significance to the State of NSW are listed on the NSW State Heritage Register (SHR) under Section 60 of the Act.

The subject site is located within proximity of the following State heritage items listed under the *Heritage Act 1977*:

Table 2 - Heritage items located within proximity of the subject site – *Heritage Act 1977*

Item Name	SHR No.	Address
Christ Church St Laurence Anglican Church and Pipe Organ	00123	812a-814 George Street
Mortuary Railway Station and site	00157	Regent Street
Railway Square road overbridge	01232	George Street
Sydney Terminal and Central Railway Stations Group	01255	Great Southern and Western Railway

Section 170 Heritage and Conservation Register

The Heritage Act also requires government agencies to identify and manage heritage assets in their ownership and control. Under Section 170 of the Heritage Act, Government agencies must keep a register which includes all local and State listed items or items which may be subject to an interim heritage order that are owned, occupied or managed by that Government body. Under Section 170A of the Heritage Act all government agencies must also ensure that items entered on its register are maintained with due diligence in accordance with State Owned Heritage Management Principles.

The subject site does not contain, nor is it located within proximity of, any sites which are listed on a S.170 Register.

Environmental Planning and Assessment Act 1979

Local Environmental Plans (LEPs) are made under the *Environmental Planning and Assessment Act 1979* (EP&A Act).

Sydney Local Environmental Plan 2012

The *Environmental Planning and Assessment Act 1979* (EP&A Act) requires each LGA to produce a Local Environment Plan (LEP). The LEP identifies items and areas of local heritage significance and outlines development consent requirements.

The subject site falls within the City of Sydney LGA and is subject to the Sydney LEP 2012. Under Section 5.10, Clause 2 of the Sydney LEP 2012, development consent is required when:

(c) disturbing or excavating an archaeological site while 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.

Under Section 5.10, Clause 7 it is specified that:

(the) consent authority must, before granting consent under this clause to the carrying out of development on an archaeological site (other than land listed on the State Heritage Register or to which an interim heritage order under the Heritage Act 1977 applies):

(a) notify the Heritage Council of its intention to grant consent, and

(b) take into consideration any response received from the Heritage Council within 28 days after the notice is sent.

Historical archaeological sites are listed under Part 3 of Schedule 5 of the Sydney LEP 2012.

The subject site contains a local heritage item listed under Part 1 of Schedule 5 of the Sydney LEP 2012 as 'Former Parcels Post Office including retaining wall, early lamp post and building interior' (item no. I1855).

The subject site is also located in proximity to a number of heritage items of both local and State significance, as identified in Table 3 below:

Table 3 - Heritage items located within proximity of the subject site – Sydney LEP 2012

Item Name	Item No.	Address	Level
Railway Square road overbridge	I180	George Street	State
Former warehouse "Canada House" including interior	I181	822 George Street	Local
Former Bank of NSW including interior	I182	824-826 George Street	Local
Central Railway Station group including buildings, station yard, viaducts and building interiors	I824		Local
Former commercial building "Orchard's Chambers" including interior	I847	793-795 Lee Street	Local
Former Lottery Office including interior	I848	814 George Street	Local
Marcus Clark Building, Sydney Technical College (Building W) including interior	I850	827-837 George Street	Local
Agincourt Hotel including interior	I2027	871 George Street	Local
Commercial building (851–855 George Street) including interior	I2038	732 Harris Street	Local



2.2. NON-STATUTORY INSTRUMENTS

Central Sydney Archaeological Zoning Plan

The Central Sydney Archaeological Zoning Plan (CSAZP) outlines and documents the survey and assessment of the archaeological potential of the city of Sydney.

The report describes the methodology, criteria and results of the archaeological assessment and lists all identified areas with archaeological potential. The work was carried out in accordance with the principles of *The Australia ICOMOS Charter for the Conservation of Places of Cultural Significance* (The Burra Charter) and the Heritage Act (as amended).

The CSAZP identifies the subject site as an 'Area of no Archaeological Potential'. This is defined as follows:

An allotment of land or feature that has been identified by the field survey as being an area of little or no archaeological potential. These areas are indicated by no shading on the field survey plans.”¹

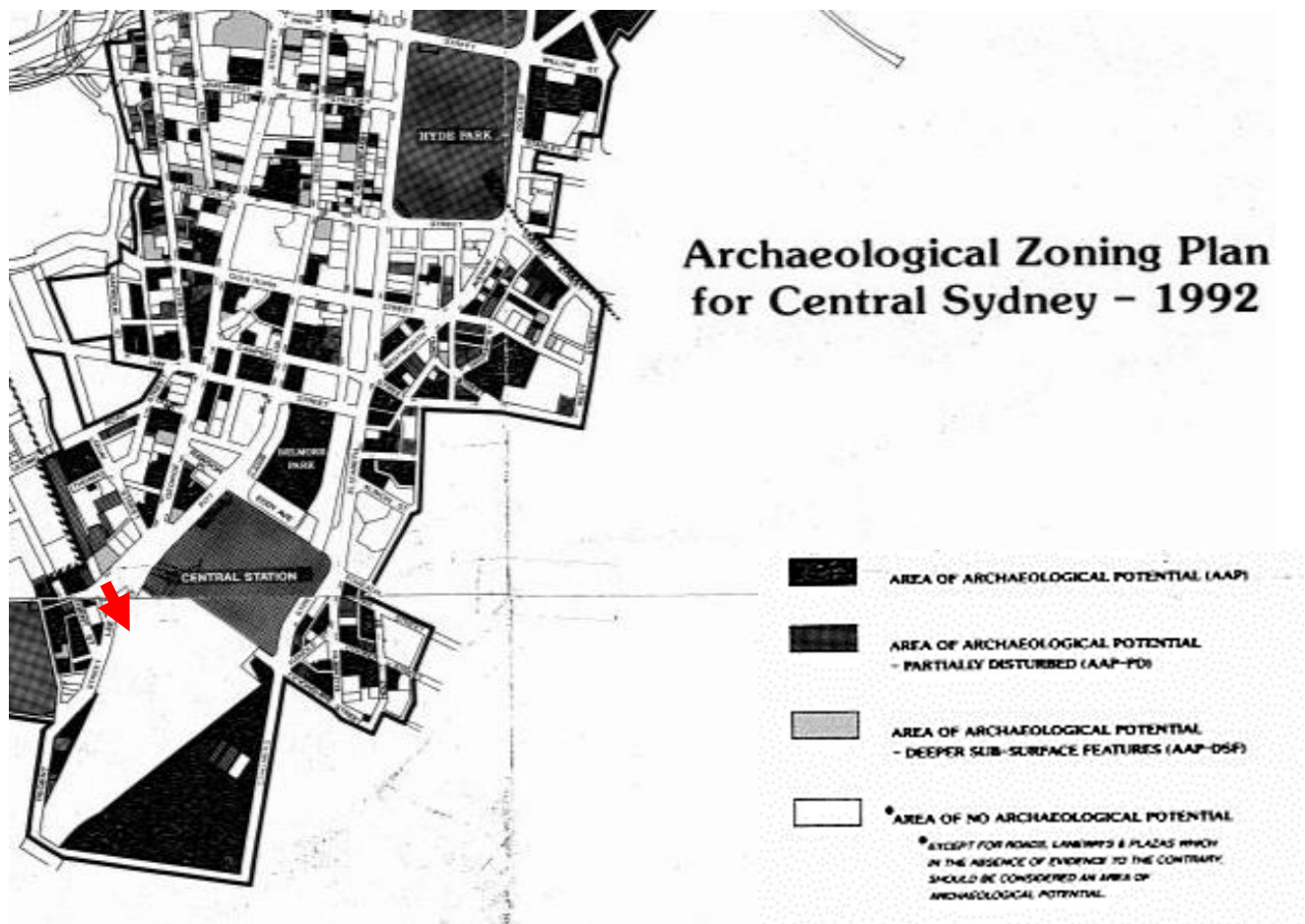


Figure 5 – CSAZP with location of subject site indicated in red. Note that it contains an 'Area of No Archaeological Potential'.

Source: Central Sydney AZP 1992

Central Station Archaeological Zoning Plan

The *Central Station Archaeological Zoning Plan* outlines the archaeological potential and significance of Central Station and adjacent areas and formulates policies accordingly.

¹ City of Sydney, 1997. *Central Sydney Archaeological Zoning Plan*, p.6

The Central Station AZP identifies the subject site as an area of 'Low Archaeological Potential', as indicated in Figure 8 and Figure 9 below:

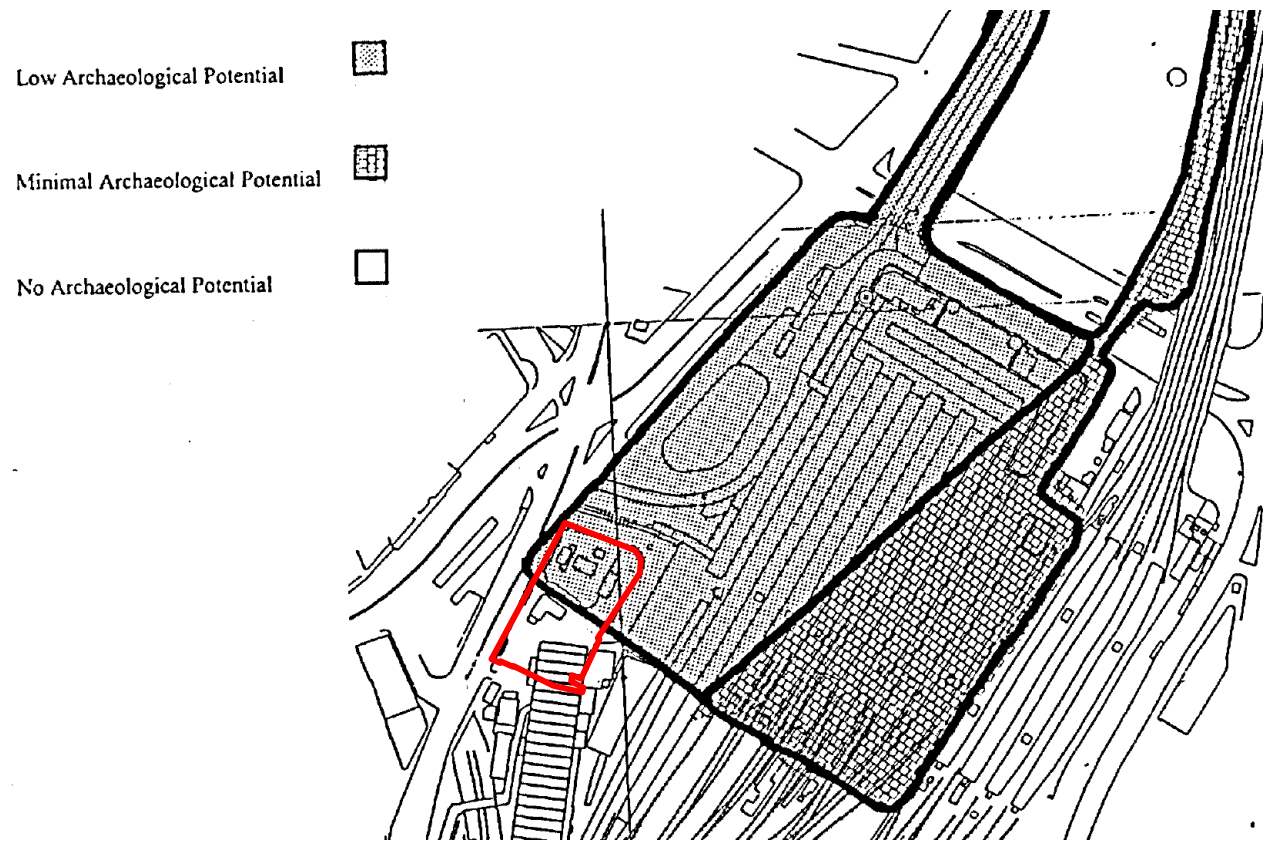


Figure 6 – Precinct 3 – Zones of Archaeological Potential.
Source: Central Station AZP

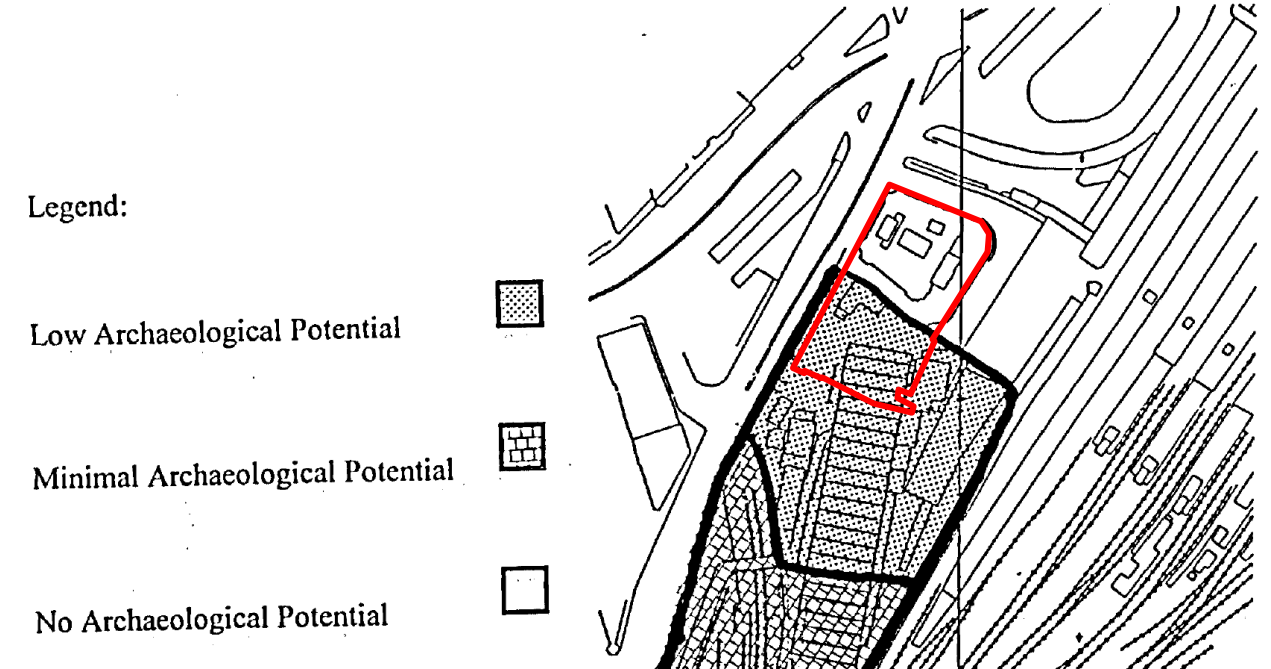


Figure 7 – Precinct 1 – Zones of Archaeological Potential.
Source: Central Station AZP

2.3. SUMMARY OF HERITAGE CONTEXT

The statutory context of the subject site is summarised as follows:

- The subject site contains a local heritage item listed under Part 1 of Schedule 5 of the Sydney LEP 2012 as 'Former Parcels Post Office including retaining wall, early lamp post and building interior' (item no. I1855).
- The subject site is located within proximity of a number State heritage items listed under the *Heritage Act 1977*, as identified in Table 2.
- The subject site is located within proximity of heritage items of both local and State significance listed under Part 1 of Schedule 5 of the Sydney LEP 2012, as identified in Table 3.
- The CSAZP identifies the subject site as an 'Area of No Archaeological Potential'.
- The Central Station AZP identifies the subject site as an area of 'Low Archaeological Potential'.

3. ARCHAEOLOGICAL CONTEXT

3.1. HISTORICAL OVERVIEW

The following section provides a brief overview of the historical development of the subject site. Italicised text has been partially extracted from the *Atlassian Central – Ambulance Avenue Investigation Works Non-Aboriginal (Historical) Archaeological Research Design* (Artefact 2020).

3.1.1. Historical Summary

A timeline of important dates and events of relevance to the subject site is provided in Table 4 below.

Table 4 – Important dates and events

Date	Event
1819	Benevolent Society Asylum commissioned by Governor Macquarie.
1821	Benevolent Society Asylum opens.
1840s	Additional wings added to Benevolent Society Asylum to accommodate growing number of residents.
1862	Resumption of Liverpool Hospital results in Asylum's shift toward supporting pregnant women.
c.1900	Land resumed for construction of the Central Railway Station.
1902	Benevolent Society Asylum closes.
April 1902	Foundation stones of Central station laid.
1903	Excavation works on the Devonshire Street Pedestrian subway commence.
1906	New railway terminus and concourse completed.
1908	Chief Commissioner for Railways and Tramways agreed to lease the subject site to the Postmaster General's Department.
May 1911	Construction of the Parcels Post Building within the northern portion of the subject site commences, including basement level.
1960s	Plans were made to vacate the Chief Parcels Office, with operations to be moved to the new Mail Exchange at Redfern. Basement extended to allow for vehicle access and parking.
1970s	Devonshire Street Tunnel extended further west under Railway Square and George Street to connect with the Goods Line.
1998-2000	Henry Deane Plaza constructed between Railway Square bus station and the Devonshire Street Tunnel entrance to Central Station.

3.1.2. Phase 1: Initial European Settlement (1788-1821)

An 1802 map (Figure 10) shows the location of the subject site on the periphery of the Sydney settlement and to the south of Parramatta Road. The landscape was at this time a low-lying swampland unsuited for agriculture and the only development within the vicinity of the site at this time included brickfields to the north (indicated as '38' in Figure 10).

In 1818 the area to the north-east of the subject site, today occupied by Central Station, was cleared to make way for a Benevolent Asylum (indicated as '55' in Figure 11) and a cemetery. The cemetery was consecrated in 1820 and the Benevolent Asylum opened in 1821, both surviving until the end of the century.

In 1819 Carters Barracks was constructed further to the north-east of the subject site (marked as '54' in Figure 11) within the vicinity of what is today Eddy Avenue. The Barracks was first used to house convicts who worked at the brickfields, then as a debtors' prison until 1843, before it was converted to a training facility for women.²

² *Carter's Barracks*, Dictionary of Sydney, accessed 10/01/2022, available at https://dictionaryofsydney.org/building/carters_barracks



Figure 8 – 1802 map indicating approximate location of subject site (circled) to the south of Parramatta Road. Note the location of the brickfields (indicated as '38') to the north of the site.

Source: Cloquet, Jean Baptiste Antoine & Lesueur, Charles Alexandre & Peron, Francois. 1807, *Plan de la ville de Sydney, capitale des colonies anglaises aux terres australes de l'Imprimerie de Langlois, [Paris]* viewed 10 January 2022 <http://nla.gov.au/nla.obj-150873690>

3.1.3. Phase 2: Benevolent Society Asylum (1821-1900s)

New South Wales Society for Promoting Christian Knowledge and Benevolence was formed by journalist Edward Smith Hall in 1813 to assist those who were sick or economically vulnerable. In 1818 this was replaced by The Benevolent Society of NSW under the auspices of the Colonial Auxiliary Bible Society.³ In 1819 Governor Macquarie commissioned the construction of the Benevolent Society Asylum within the northern portion of the subject site. The asylum opened in 1821 and remained open until 1902.

Within a year of its construction, the Benevolent Asylum was housing over fifty people. More than 1000 people were living there by the 1840s when additional wings were added to the building to accommodate the increase in residents. Inhabitants were provided with shelter, food, and medical assistance. By 1850, the main purpose of the Asylum was assisting married women, particularly pregnant women, older men and destitute families. Following the government resumption of Liverpool Hospital in 1862, men ceased residing at the Benevolent Asylum and were instead sent to Liverpool. Following this, the focus of the Asylum shifted to supporting pregnant women, both married and single.⁴ The various phases of development at the Asylum can be seen on historic maps, showing the addition of extra wings on the sides of the original building (Figure 12-Figure 15).

This subject site was resumed in c.1900 for the construction of Central Railway Station. The structures associated with the asylum were subsequently demolished. Evidence of the Asylum would be located to the north-east - and outside the curtilage of - the subject site. Historical maps indicate that the north-eastern portion of the subject site was located within the boundary of the Asylum site (see Figure 13 & Figure 14). The southern portion of the subject site remained vacant with the exception of an unidentified structure in the south-eastern portion of the site which can be observed in the 1855-1865 Trigonometrical Survey (Figure 15).

³ McCormack, T. 2008, *Benevolent Society and Asylum*, The Dictionary of Sydney, available at https://dictionaryofsydney.org/entry/benevolent_society_and_asylum

⁴ Sydney Benevolent Asylum, Sydney Benevolent Asylum: Index to Admissions and Discharges 1857-1900, 2016, <http://www.sydneybenevolentasylum.com/>

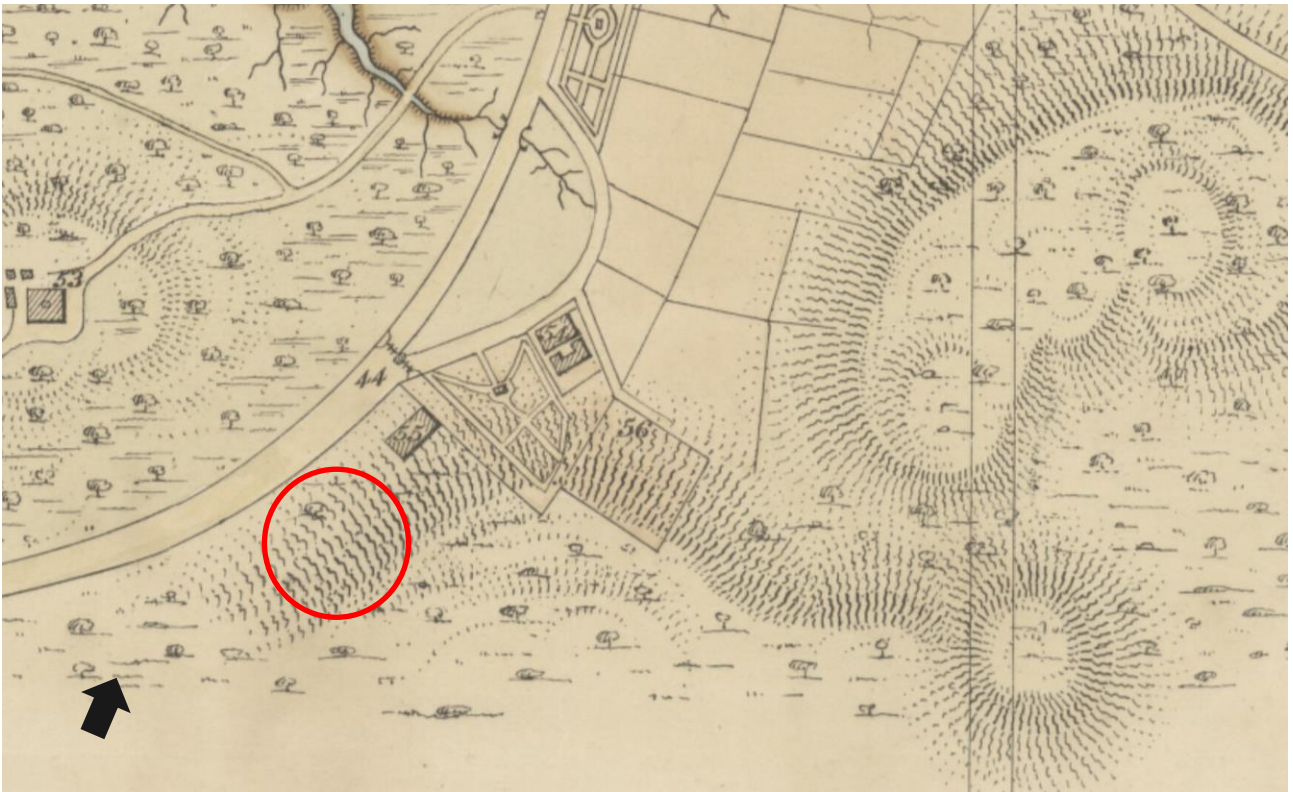


Figure 9 – 1822 plan with approximate location of subject site indicated in red. Note the location of the Benevolent Asylum (indicated as '55') and Carter's Barracks (indicated as '54') to the north-east of the site.

Source: 1822, *Plan of the town and suburbs of Sydney, August, 1822* [S.I viewed 10 January 2022]
<http://nla.gov.au/nla.obj-229911701>



Figure 10 – 1849 map indicating location of subject site in red. The northern portion of the site was incorporated within the Asylum boundary and the southern portion within the Government Paddocks at this date.

Source: *Plan of Part of the South End and Suburbs of the City of Sydney, 1849* Peter Lewis Beml (1795-1853)
 State Library of NSW, Sydney

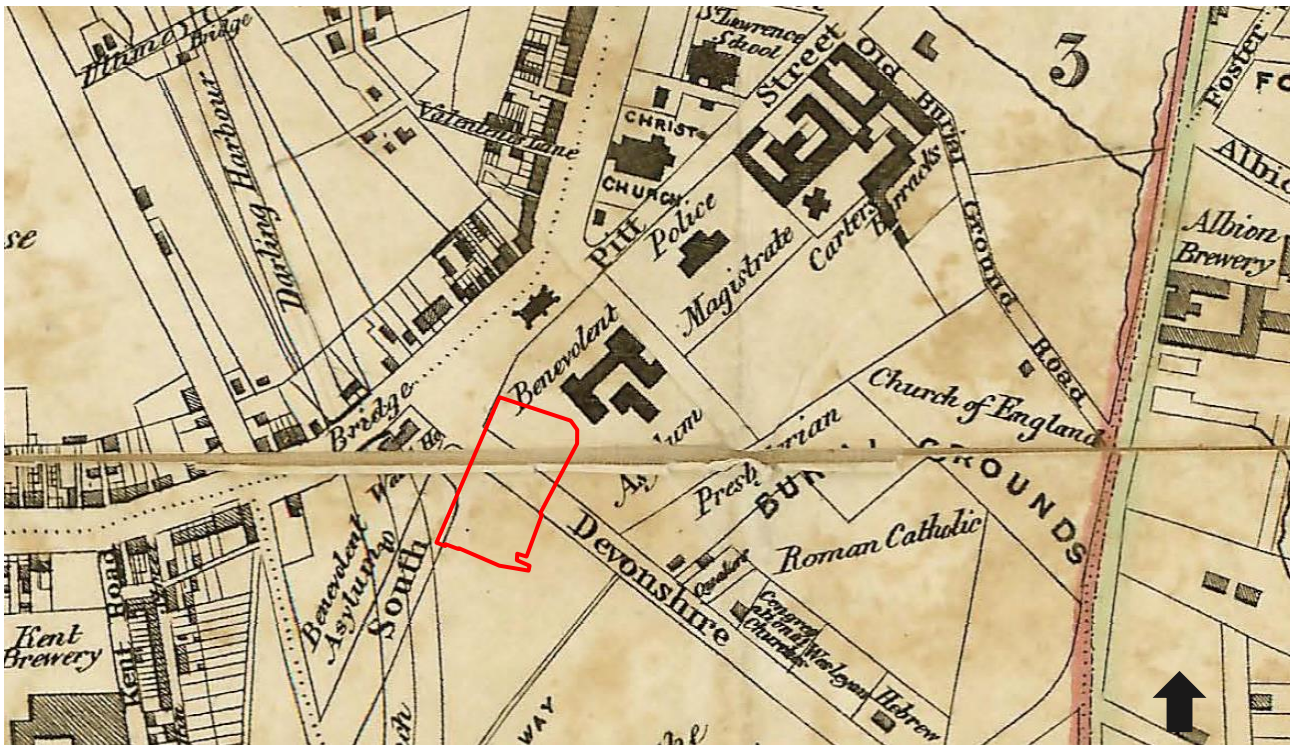


Figure 11 – 1854 Woolcott & Clarke map indicating location of Benevolent Asylum within subject site
 Source: Woolcott & Clarke, *City of Sydney*, 1854: Single sheet (01/01/1854 - 31/12/1854), [A-00880471]. City of Sydney Archives, accessed 30 Nov 2021, <https://archives.cityofsydney.nsw.gov.au/nodes/view/1709398>

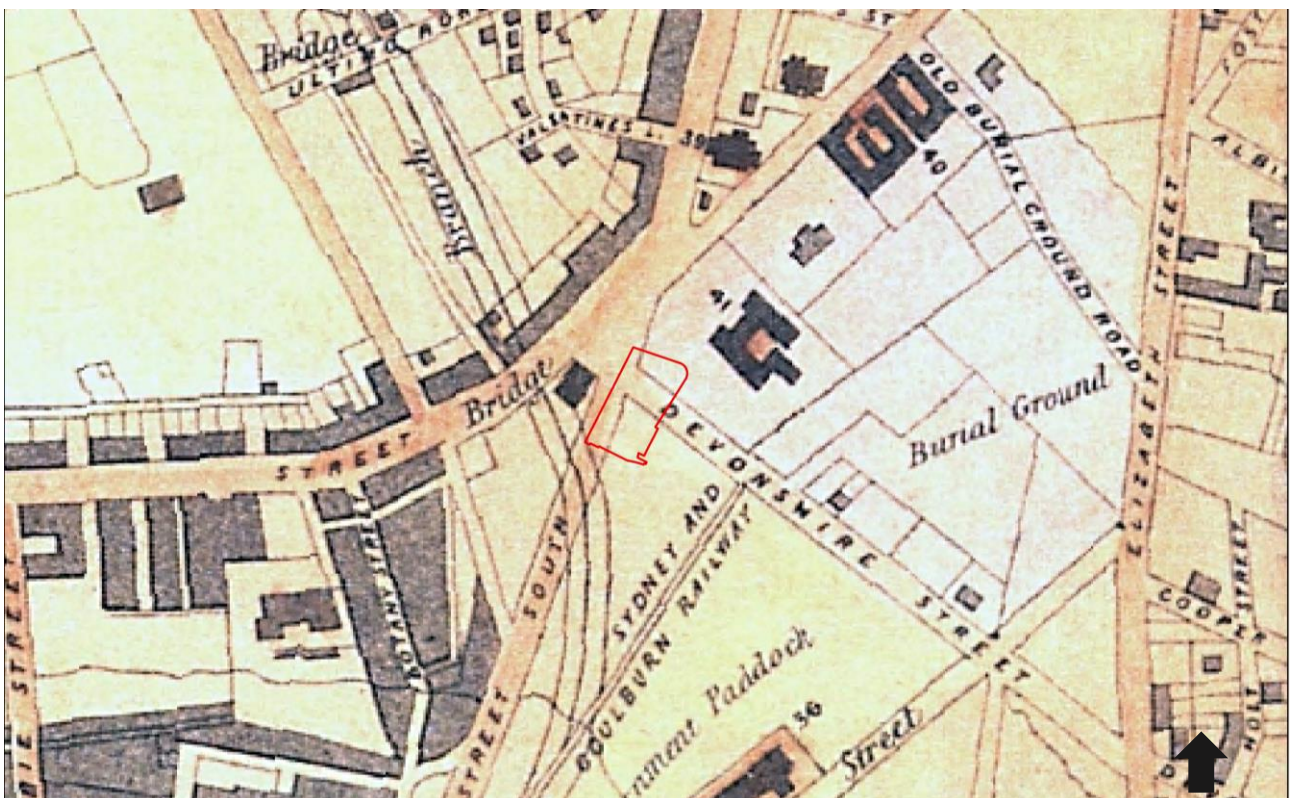


Figure 12 – 1855 Smith & Gardiner map indicating location of Benevolent Asylum within subject site
 Source: Smith & Gardiner, *Printers and Publishers, City of Sydney*, 1855: Single sheet, [A-00880472]. City of Sydney Archives, accessed 30 Nov 2021, <https://archives.cityofsydney.nsw.gov.au/nodes/view/1709399>

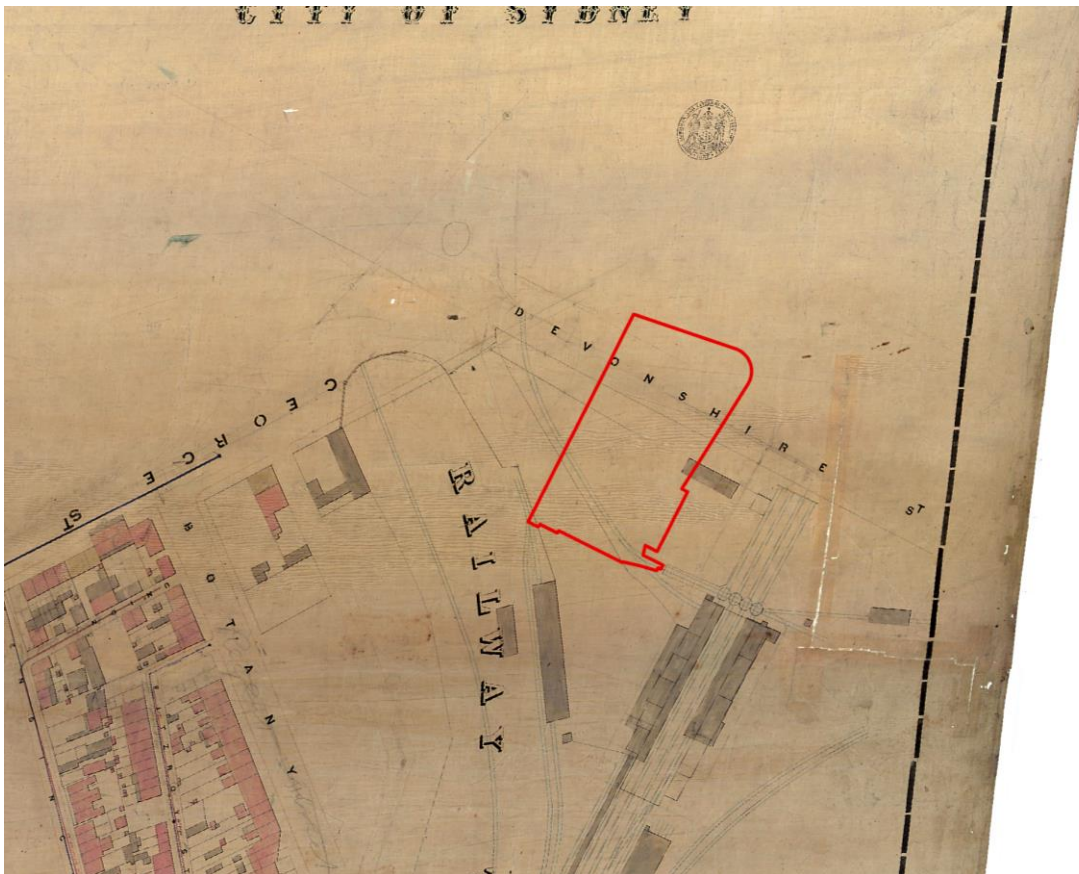


Figure 13 – 1855-1865 Trigonometrical Survey with subject site indicated in red. Note location of unidentified structure within south-eastern portion of subject site.

Source: City of Sydney - City Surveyor's Department, City of Sydney - Trigonometrical Survey, 1855-1865: Block S2 (01/01/1865 - 31/12/1865), [A-00880408]. City of Sydney Archives, accessed 17 Jan 2022, <https://archives.cityofsydney.nsw.gov.au/nodes/view/1709335>

3.1.4. Phase 3: Central Railway Station (1900-1970s)

In December 1900 it was decided that the new station would be constructed on the Devonshire Street site, requiring the demolition of the Benevolent Asylum, Carters Barracks, Police Barracks and Devonshire Street Cemetery, as well as other buildings on the block. Evidence of this construction event, including demolition layers and features associated with the Benevolent Asylum, have been uncovered on archaeological excavations undertaken in the subject site vicinity (see Section 3.2).⁵

The first foundation stones of redeveloped Central station were laid in April 1902, and in 1903 excavation works on the Devonshire Street Pedestrian subway (or tunnel) had commenced. The new railway terminus and main concourse were completed in 1906, with the official opening taking place on 4 August that year. By 1906 the buildings of the old Redfern Station were demolished, and Eveleigh Station was renamed Redfern Station. The remainder of the subject site was used as green space and storage to support the railyards.

In 1908, the Chief Commissioner for Railways and Tramways agreed to lease the vacant lot fronting George Street to the north of the Devonshire Street Subway to the Postmaster General's Department. The site was used for storage purposes until construction of the Parcels Post Building commenced in 1911.

In the 1970s the Devonshire Street tunnel was extended to the western side of George Street. Historic images from this period (Figure 16 & Figure 17) show high levels of disturbance within the subject site.

⁵ Casey & Lowe, 2009. Results of Archaeological Testing: Western Forecourt, Central Station. Archaeological report.

Significant excavation was undertaken to establish the descent from Lee Street to the tunnel entrance (Figure 18 & Figure 19). Within the tunnel are a number of retail stores which extend under the current subject site.



Figure 14 – 1970s photograph of the subject site indicating the extent of disturbance associated with the extension of the Devonshire Street tunnel.

Source: City of Sydney Archives, A-00055529, available at <https://archives.cityofsydney.nsw.gov.au/nodes/view/677677>



Figure 15 - 1970s photograph of the subject site indicating the extent of disturbance associated with the extension of the Devonshire Street tunnel.

Source: City of Sydney Archives, A-00055531, available at <https://archives.cityofsydney.nsw.gov.au/nodes/view/677679>



Figure 16 – 1970s photograph indicating descent from Lee Street to tunnel entrance.

Source: City of Sydney Archives, A-00016001, available at <https://archives.cityofsydney.nsw.gov.au/nodes/view/579787>



Figure 17 - 1970s photograph indicating descent from Lee Street to tunnel entrance.

Source: City of Sydney Archives, A-00016001, available at <https://archives.cityofsydney.nsw.gov.au/nodes/view/579787>

3.1.5. Phase 4: Parcels Post Building (1911-1998)

In May 1911 construction of the Parcels Post Building commenced on the former railway lands to the north of the Devonshire Street Subway, the current subject site. The Parcels Post building was crucially important for the processing of mail and training of clerks in the early-late 1900s.

In the 1960s, plans were made to vacate the Chief Parcels Office, with operations to be moved to the new Mail Exchange at Redfern. The building was intended to take on a new function, with the extension of the basement to allow for vehicle access and parking. The ground floor of the Parcels Post Building continued to

operate as the Railway Square Post Office until 1993, although the function of the rest of the building is difficult to trace.

The basement level of the Parcels Post Building was constructed in the first phase of development in May 1911. The soil profile was excavated to a depth of 2 metres to accommodate the basement level, decreasing the archaeological potential in this location (refer to Table 1). The former Parcels Post Building was sold in 2004 to TOGA Group and is currently utilised as a hotel/apartment complex.

The southern section of the subject site, now occupied by the Henry Deane Plaza, contained for most of the twentieth century a number of structures including the West Carriage Shed, support offices, demountable workshops and a store. Aerial photographs (Figure 23-Figure 25) reveal the extent of the West Carriage Shed, which occupied most of the south-eastern portion of the site, with the offices and workshops located to the east and west. A number of smaller ancillary structures can also be observed immediately to the south and east of the former Parcels Post Building (Figure 24 & Figure 25). The 2005 aerial photograph (Figure 26) reveals that by this time these structures had been removed and the current site configuration established.

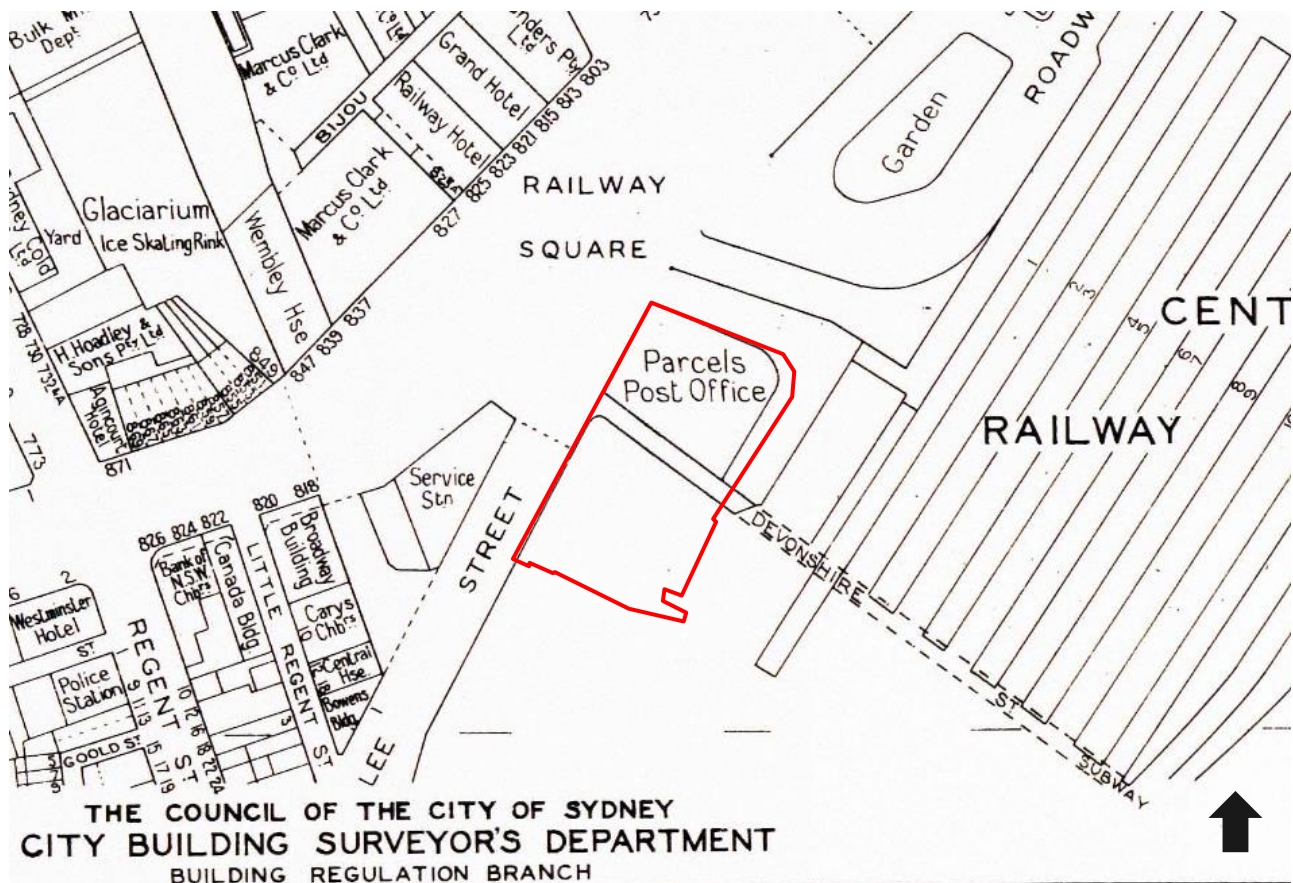


Figure 18 – 1949-1972 Surveyor detail sheet. Note the Devonshire Street Subway (tunnel) to the south of the Parcels Post Building.

Source: City of Sydney - City Building Surveyor's Department, City of Sydney - Building Surveyor's Detail Sheets, 1949-1972: Sheet 10 - Central (01/01/1949 - 31/12/1972), [A-00880185]. City of Sydney Archives, accessed 01 Dec 2021, <https://archives.cityofsydney.nsw.gov.au/nodes/view/1709112>

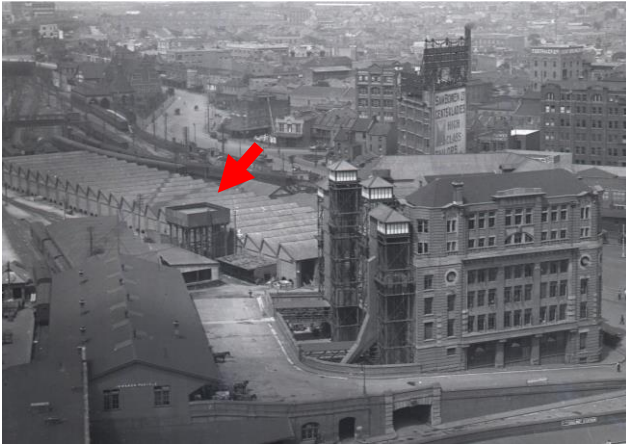


Figure 19 – c.1913 photograph with West Carriage Shed to south of Parcels Post Building indicated with arrow.

Source: City of Sydney Archives

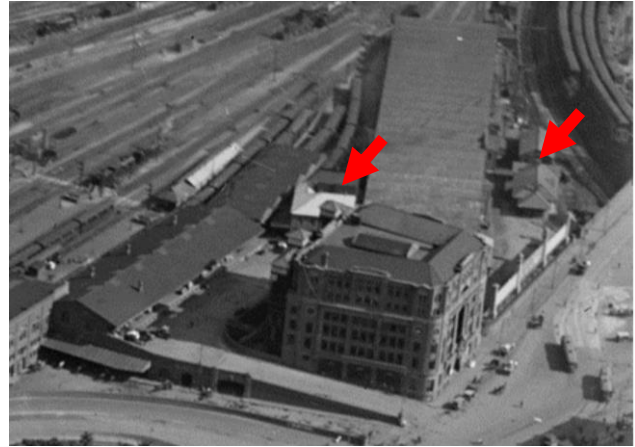


Figure 20 - 1920 photograph with support offices and demountable workshops indicated with arrows.

Source: City of Sydney Archives



Figure 21 – 1943 aerial photograph with West Carriage Shed to south of Parcels Post Building.

Source: NSW Spatial Services



Figure 22 – 1949 aerial photograph. Note addition of ancillary structures to east of the Parcels Post Building.

Source: NSW Spatial Services

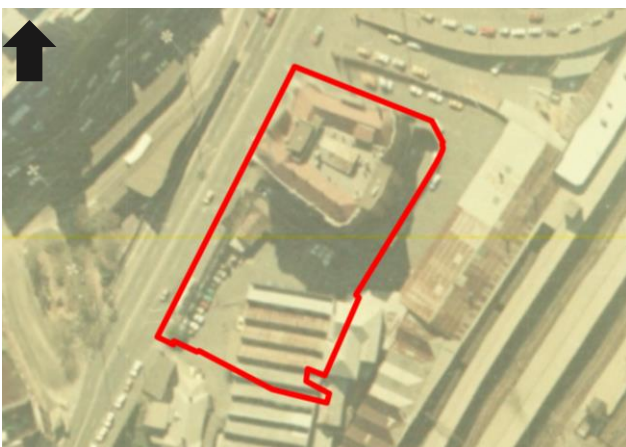


Figure 23 – 1986 aerial photograph. Note addition of ancillary structures to south of Parcels Post Building.

Source: NSW Spatial Services

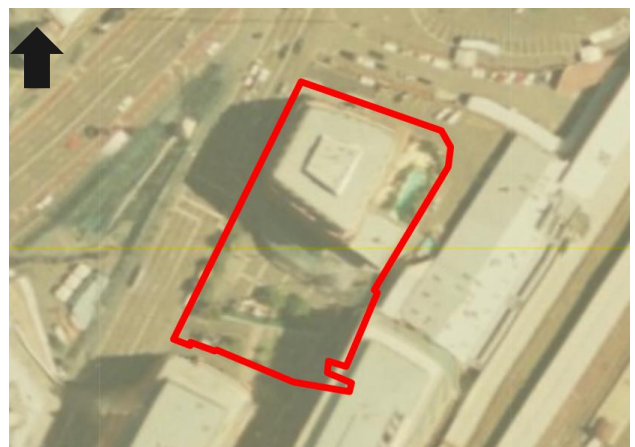


Figure 24 – 2005 aerial photograph. By this time the West Carriage Shed and ancillary structures had been removed and the current site configuration established.

Source: NSW Spatial Services

3.1.6. Phase 5: Adina Apartments and Henry Deane Plaza (1998-Present)

By 1998 the West Carriage Shed, support offices, demountable workshops and store had been demolished for the construction of Henry Deane Plaza. The Plaza was constructed between 1998-2000 between Railway Square bus station and the Devonshire Street Tunnel entrance to Central Station. It includes a retail plaza, the Henry Deane Building and Gateway House.⁶

⁶ The Dictionary of Sydney, https://dictionaryofsydney.org/building/henry_deane_plaza

3.2. PREVIOUS ARCHAEOLOGICAL INVESTIGATIONS

Previous archaeological investigations may provide information on the potential nature and distribution of archaeological resources in a given area. A summary of relevant assessments is provided below.

3.2.1. Archaeological Investigations of the Subject site

AMBS, 2021, *Former Inwards Parcels Office Research Design for Historical Archaeological Testing*

AMBS Ecology & Heritage (AMBS) was commissioned by Urbis Pty Ltd (Urbis) on behalf of Atlassian to prepare the *Former Inwards Parcels Office Research Design for Historical Archaeological Testing* for a proposed commercial and hotel development above the Former Inwards Parcel Shed at 8-10 Lee Street, Haymarket. The site encompasses a small area within the north-eastern portion of the subject site.

Overlays of current aerial photographs on an 1888 plan located the southern wing of the Benevolent Asylum within the north-eastern portion of the site. It was noted that Casey & Lowe's investigations in the Western Forecourt of Central Station exposed foundation trenches associated with the Asylum and evidence of its demolition at approximately 1 metre below the existing ground level. Although the level of disturbance associated with the former Inwards Parcel Shed was unknown, it was suggested that the foundation stones associated with the southern wing of the Benevolent Asylum might be extant beneath the concrete slab of the basement level. A timber outbuilding was also identified to the south-west of the Asylum. Given its timber construction, however, potential for evidence of this structure was assessed as low.

The Research Design recommended that archaeological testing be undertaken in order to determine the alignment and scale of the Asylum Building and integrity of any associated archaeological remains. Test trench 1 was positioned so as to capture the eastern portion of the Benevolent Asylum south wing in order to verify the approximate location of the building. Test Trench 2 was positioned to identify the continuation of the southern wall of the Benevolent Asylum south wing and the integrity of brick additions to the Asylum (Figure 27). It is of note that the buildings associated with the Asylum were located outside the curtilage of the subject site.

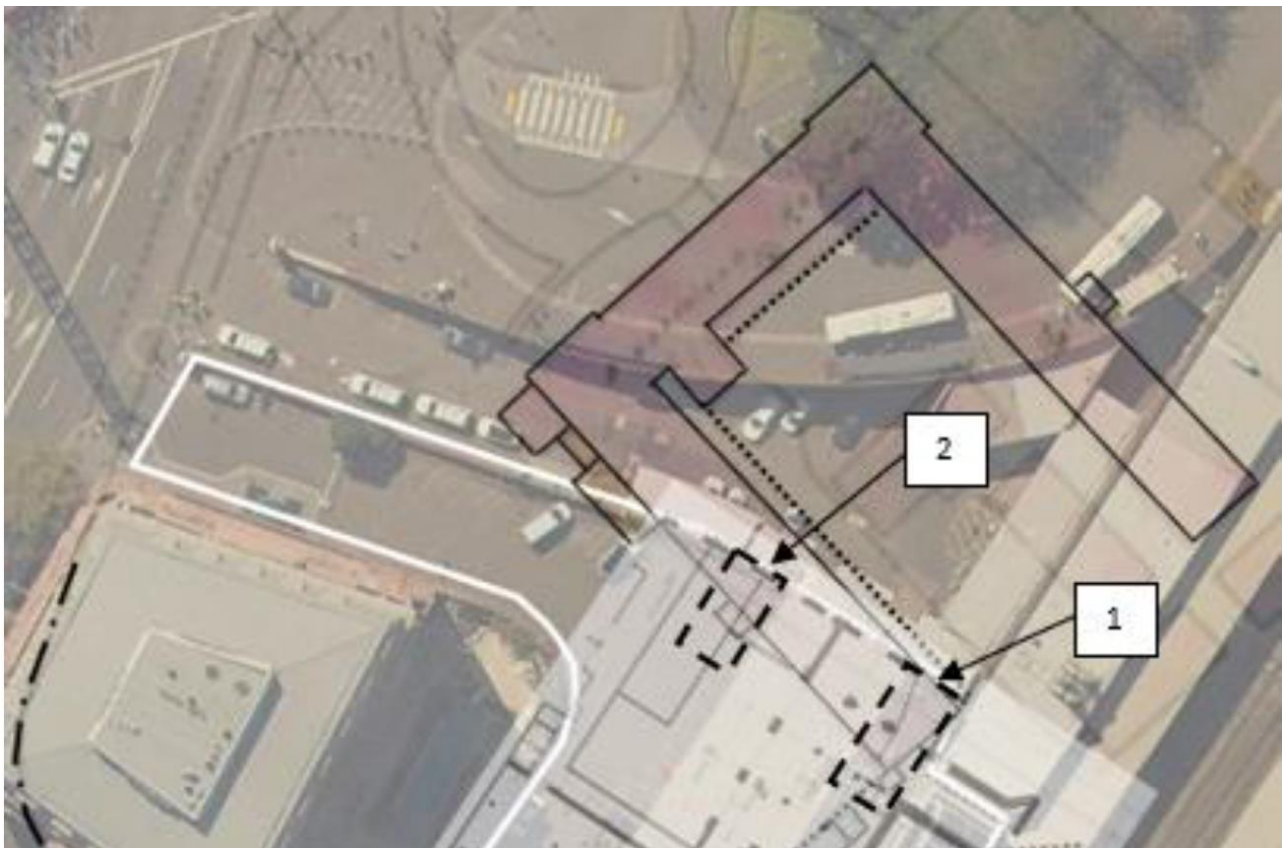


Figure 25 – Proposed test trench locations overlaid with extant building plan. Where internal walls and columns are located within the trench the excavation will avoid these structures.

Source: AMBS 2021

Artefact, 2020, *Atlassian Central – Ambulance Avenue Investigation Works Non-Aboriginal (Historical) Archaeological Research Design*

Artefact Heritage Services (Artefact) was commissioned by Avenor to prepare a Non-Aboriginal Archaeological Research Design (ARD) for the site of the former Inward Parcels Office on the western margin of Sydney Central Station. The site is located immediately to the north-east of the subject site.

Earlier archaeological assessments relating to this site had revealed that it was likely to contain evidence of the 1821 Benevolent Asylum.

The ARD established the following in relation to the archaeological potential of the site:

- There is a low potential to identify local to State significant archaeological remains associated with the Benevolent Asylum (1820–1901). It is considered likely that ground excavation works have removed the majority of archaeological remains and if remains are present, these are likely to be heavily truncated, impacted or isolated.
- The proposed works at the subject site comprise a controlled archaeological testing program, in which archaeological remains would be preserved and recorded in situ. The archaeological impact of the proposal is therefore assessed as nil.

AMBS, 2020, *Former Inwards Parcels Office Historical Archaeological Assessment and Research Design*

AMBS Ecology & Heritage (AMBS) was commissioned by Urbis Pty Ltd (Urbis) on behalf of Atlassian to prepare an Historical Archaeological Assessment and Research Design (HAARD) for a proposed commercial and hotel development above the Former Inwards Parcel Shed at 8-10 Lee Street, Haymarket. The site encompasses a small area within the north-eastern portion of the subject site.

The site encompasses the former location of the Benevolent Asylum (c.1819-1901). The proposed development included the provision for basement levels beneath the Parcels Office, which would result in the disturbance of archaeological resources associated with the Asylum.

Review of archaeological investigations undertaken at comparable sites established that there was potential for archaeological resources which are undocumented on historical maps. These included a convict-built box drain, which was uncovered at the Liverpool Hospital site, and which was assessed to have been similar to the early drainage system of the Asylum. It was also anticipated that the Asylum may have had an associated burial ground.

The HAARD established that there was potential for the site to include structural remains of the former Asylum and outbuildings indicated on historical plans, as well as associated occupational deposits. Comparative sites, such as Hyde Park Barracks, also demonstrated multiple occupation and development periods. AMBS assessed that there was considerable potential for the artefactual record associated with the Asylum to provide additional information in relation to these.

It was assessed that archaeological resources associated with the former Asylum had the potential to relate to research themes associated with the development of colonial Sydney as well as the historic development of the area from the early 19th century. The potential archaeological resource, if present with good integrity, was assessed to have state significance.

GML, 2019, *Western Gateway Sub-Precinct Proposal: Block B, 14-30 Lee Street, Haymarket NSW 2000: Archaeological Assessment*

Godden Mackay Logan (GML) was engaged by Dexus CPA Pty Ltd (Dexus) and Frasers Property Australia (Frasers Property) to prepare an Archaeological Assessment to facilitate redevelopment of the Western Gateway sub-precinct at 14-30 Lee Street, Sydney. The Gateway sub-precinct site encompassed a small portion of the subject site within the north-western portion.

Historical research revealed that the Gateway sub-precinct site was outside the boundary of the 1855/ 1888 Benevolent Asylum (Figure 28). The 1855 and 1888 Devonshire Street Tunnel occupies the north-eastern portion.

The site was assessed as having low potential for historical archaeological remains on the grounds that the 1998 redevelopment of the site had likely removed all potential for evidence relating to the use of the site as the Western Yards. It was further assessed that there was little potential for evidence relating to the use of

the site by the Benevolent Asylum. Any potential remains were assessed as not meeting the threshold for either local or State significance.

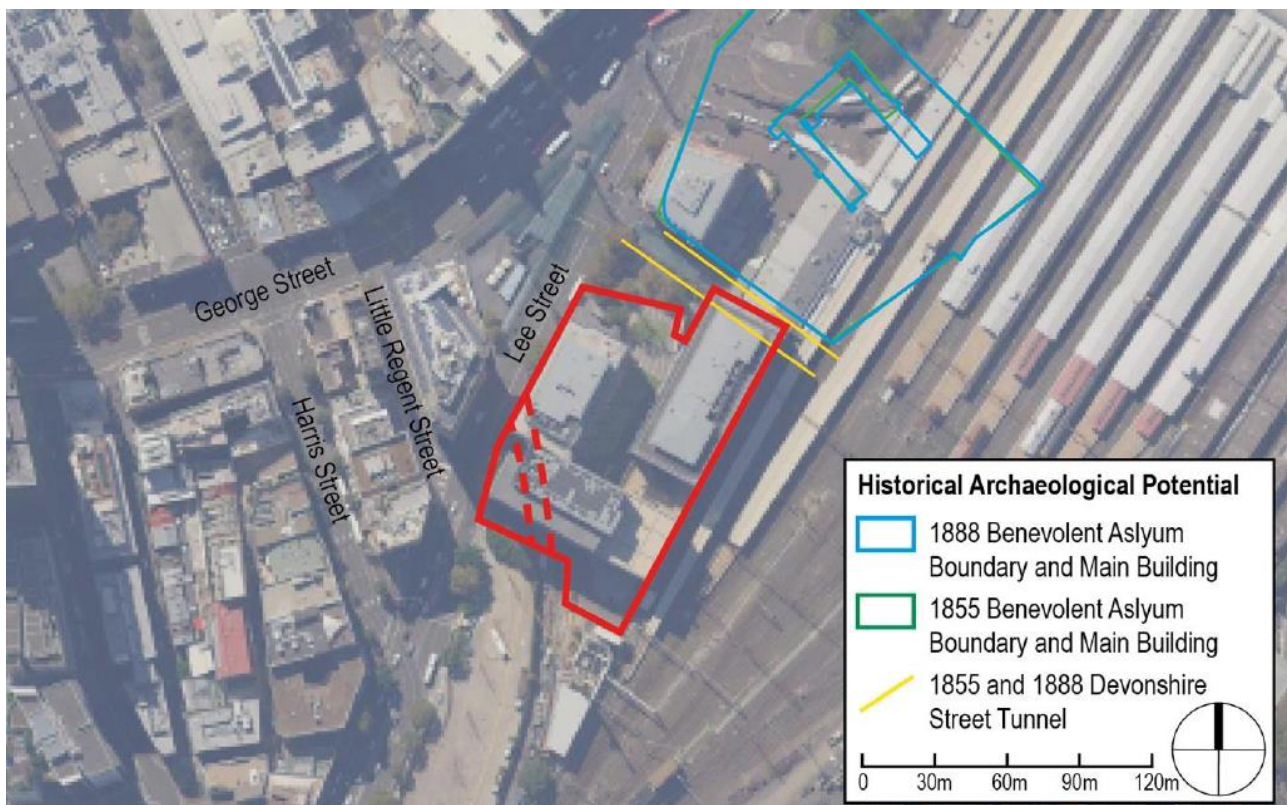


Figure 26 – Modern aerial with 1855 and 1888 overlay showing the boundary of the Benevolent Asylum falling just beyond the Site boundary.

Source: GML Heritage 2019

3.2.2. Archaeological Reports in the Vicinity

Previous archaeological investigations of similar contexts to the subject site may provide information on the potential nature and distribution of archaeological resources. A summary of relevant assessments is provided below.

AMAC, 2016, *Archaeological Assessment, Research Design, Excavation Methodology & Heritage Impact Statement: Footings [066], [073] and [080], Lee Street Substation Site, Central Station, Sydney*

The Archaeological Management and Consulting Group (AMAC) was commissioned by UGL Limited, on behalf of Transport for NSW (TfNSW) to prepare an Archaeological Assessment, Research Design, Methodology and Heritage Impact Statement in support of an S60 permit application for the Lee Street Substation site, Central Station, Sydney. The site is located approximately 50 metres south-west of the subject site.

The Substation site was subject to a Section 60 Permit and during monitoring under that permit, three brick structures were uncovered – brick footing [066], circular brick footing [073] and brick footing [074]. These features were identified as potential relics and AMAC was engaged to produce a S60 application in order to assess the relics and develop a research design and methodology for their management.

Investigation of the footings revealed that they were the truncated base courses of large brick structures whose foundations were cut into a modified natural clay [075]. Footings [066] and [080] formed the western and eastern foundations of 'Platform 1' for the c.1884 extended Second Sydney Station. Footing [074] was identified as part of the platform structure to provide support for an above ground platform structure such as a lamp and Circular footing [073] was the brick foundation for a former wagon turntable dated to the First Sydney Station phase of the site.

As evidence of the c.1884 'Platform 1' foundations of the Second Sydney Station, footings [066], [074] and [080] were assessed to be locally significant. As evidence of the First Sydney Station phase, the wagon turntable foundation [073] was assessed as having State significance.

It was recommended removal of footings [066], [074] and [080] proceed under archaeological supervision and in adherence with the research design and methodology which formed part of this report. Retention in situ of Footing [073] was stated as the ideal outcome, although it was acknowledged that design requirements would not accommodate this. It was therefore recommended that the item be removed and relocate the relic for heritage interpretation purposes and that a rail heritage specialist be engaged to manage this process.



Figure 27 – Footing [080], circular footing [073], footing [074] and footing [066], facing south.

Source: AMAC 2016



Figure 28 – Footing [080], circular footing [073] and conduit capping [085], facing east.

Source: AMAC 2016

3.2.3. Conclusions from Previous Investigations

The following conclusions are drawn from previous archaeological investigations relevant to the subject site:

- Previous investigations (GML 2019, AMBS 2020) have confirmed that the buildings associated with the 19th century Benevolent Asylum were located outside the curtilage of the subject site, whereas it was located within the Asylum boundary. There is therefore potential for evidence of this former precinct within the north-eastern portion of the subject site.
- The landscape which encompasses the subject site was subject to significant disturbance and importation of fill throughout the 20th century.
- Despite significant disturbance, the topography of the 19th century landscape is likely retained beneath the extant buildings.

3.3. GEOTECHNICAL INVESTIGATIONS

Douglas Partners, 15 May 2020, Interim Data Release: Site Plan, Factual Data and Interpreted Cross-Sections, for a Proposed Commercial Development

Douglas Partners (DP) was engaged by Atlassian Pty Ltd to prepare an interim factual data release for a proposed commercial development at 8-10 Lee Street, Haymarket.

A number of geotechnical cross-sections were produced (A"-A – D"-D) based on the results retrieved from previous borehole test locations located to the east of the subject site and within the vicinity of the former Parcels Shed (and current YHA building) (Figure 31).

Interpreted geotechnical Cross-Section D"-D (Figure 32) reveals that a fill layer causes the topography to ascend gradually to the south-east. This includes the portion of the subject site which sits roughly equivalent with the former Parcels Post Building. This fill overlies approximately 1-1.5 metres of silty clay; 1-1.5 metres of weathered sandstone/shale; and sandstone bedrock.

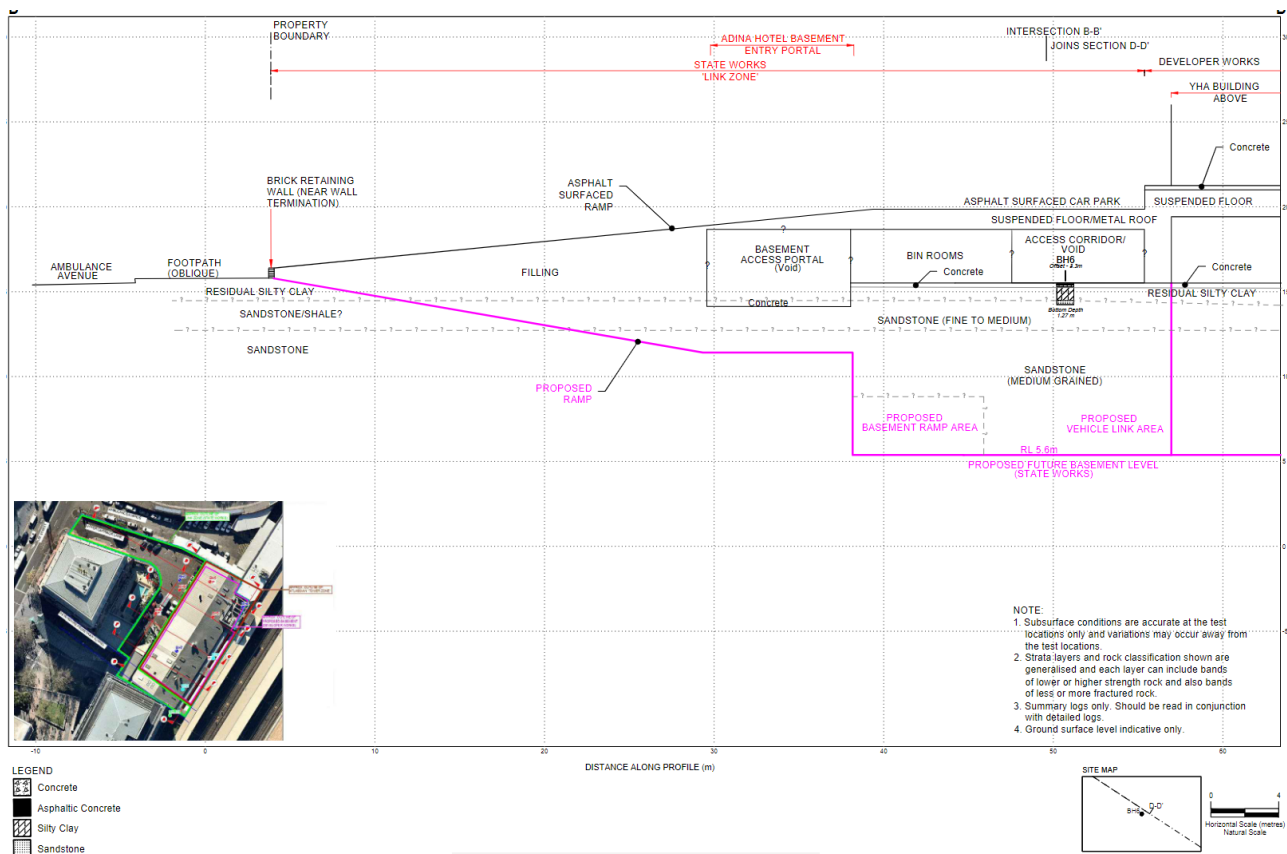


Figure 30 – Interpreted Geotechnical Cross-Section D''-D', Proposed Commercial Development 8-10 Lee Street, Haymarket

Source: Douglas Partners, 15 May 2020

3.4. VISUAL INSPECTION

3.4.1. Former Parcels Post Building

The following description of the Parcels Post Building has been extracted from the State Heritage Inventory for 'Former Parcels Post Office Including Retaining Wall, Early Lamp Post and Building' (item no. 1855):

The Parcels Post Office, because of its size and position, is a dominant building and focus within Railway Square. It is of Federation Academic Classical style. While designed in two stages it was built as one building. Its six-storey rusticated brick facade is tripartite to the Railway Square elevation with a slight protruding central bay marked by an arched doorway broken by a dentilated cornice. Stone edged oeuil de boeuf windows occur on the corners where above the balustraded entablature exedras mark the corners topped by pyramidal tile roofs. To the rear elevation a full height extension has replaced the original external lift construction.



Figure 31 – Former Parcels Post Building. View west.



Figure 32 – Former Parcels Post Building. View south.

3.4.2. Henry Deane Plaza

Henry Deane Plaza, named after Henry Deane, a prominent engineer for the NSW railways and Engineer in Chief from 1891-1906 and during the development of the first phase of the Station, was historically the site of the Western Yard (former Parcels precinct). That part of the yard immediately south of the Devonshire Street Tunnel and the subject Parcels Post building, now occupied by the Henry Deane Plaza, contained for most of the twentieth century a number of structures including the West Carriage Shed, support offices, demountable workshops; and a store. These buildings and features were demolished for the construction of Henry Deane Plaza which was constructed between 1998 and 2000.

The Plaza consists of a level surface which occupies the space between the Devonshire tunnel entrance to the south-east and George Street extension to the north-west. The plaza is approximately 2.8 m below street level, suggesting a high level of ground disturbance in this location. At the entrance to Devonshire Street Tunnel is a large public sculpture and a glazed canopy covers the walkway leading into Railway Square. This area forms part of the busy pedestrian connection from Central Station to Railway Square and on to George and Pitt Streets, and pedestrian subways.



Figure 33 – Paved surface to south of former Parcels Post Building with glazed canopy over Henry Deane Plaza. View east.



Figure 34 – Henry Deane Plaza sits approximately 2.8 metres below street level. View north.

3.4.3. Devonshire Street Tunnel

The Devonshire Street Tunnel was the first subway in Australia and an integral part of Henry Deane's overall plan for the development of the Central Station site. The pedestrian tunnel was built during the main construction phase of the Central Terminal between 1903 and 1906, and followed the alignment of former Devonshire Street, running in an east-west direction. The tunnel provides an unimpeded pedestrian link beneath the railway lines at Central Station, connecting the Ibero-American Plaza (on Chalmers Street) and the Henry Deane Plaza (on Lee Street). The western point of the tunnel converges within a covered public

space containing a number of retail tenancies and take-away food outlets within Henry Deane Plaza, south of the former Parcels Post Office.

Since its inception, the tunnel interior has been constantly modified. The pedestrian link was extended in the 1970s. Currently the pedestrian link continues below railway square, terminating on the western side of George Street where the thoroughfare connects with the Goods Line.



Figure 35 – Entrance to George Street extension of Devonshire Street Tunnel. View north-west.



Figure 36 – Entrance to Devonshire Street Tunnel from south-eastern portion of Henry Deane Plaza. View north-west from tunnel interior.

4. ARCHAEOLOGICAL POTENTIAL

4.1. FRAMEWORK FOR ASSESSMENT

The *NSW Heritage Manual* (Heritage Office and Department of Urban Affairs and Planning, 1996) defines historical archaeological potential as:

The degree of physical evidence present on an archaeological site, usually assessed on the basis of physical evaluation and historical research.

Archaeological research potential of a site is the extent to which further study of relics likely to be found is expected to contribute to improved knowledge about NSW history which is not demonstrated by other sites, archaeological resources or available historical evidence. The potential for archaeological relics to survive in a particular place is significantly affected by later activities that may have caused ground disturbance. These processes include the physical development of the site (for example, phases of building construction) and the activities that occurred there.

The archaeological potential of the subject site is assessed based on the background information presented in Section 3 and graded according to the following scheme:

- **Nil Potential:** the land use history demonstrates that high levels of ground disturbance have occurred that would have destroyed any archaeological remains; or archaeological excavation has already occurred and removed any potential resource.
- **Low Potential:** the land use history suggests limited development or use, or there is likely to be quite high impacts in these areas; however, deeper sub-surface features such as wells, cesspits and their artefact bearing deposits may survive.
- **Moderate Potential:** the land use history suggests limited phases of low to moderate development intensity, or there have been some impacts in the area. Some archaeological remains are likely to survive, including building footings and shallower remains, in addition to deeper sub-surface features.
- **High Potential:** substantially intact archaeological deposits could survive in these areas.

The potential for archaeological remains or 'relics' to survive in a particular place is significantly affected by land use activities that may have caused ground disturbance. These processes include the physical development of the site (e.g. phases of building construction) and the activities that occurred there. The following definitions are used to consider the levels of disturbance:

- **Low Disturbance:** the area or feature has been subject to activities that are likely to have had a minor effect on the integrity and survival of archaeological remains.
- **Moderate Disturbance:** the area or feature has been subject to activities that may have affected the integrity and survival of archaeological remains. While archaeological evidence may be present, they are likely to have been disturbed.
- **High Disturbance:** the area or feature has been subject to activities that would have had a major effect on the integrity and survival of archaeological remains. Archaeological evidence are likely to be significantly disturbed or destroyed.

The following assessment of archaeological potential of the present subject site has been undertaken based on the above framework.

4.2. HISTORICAL DISTURBANCE

From the earliest period of European settlement, the subject site consisted of low-lying swampland on the periphery of the Sydney settlement, which was unlikely to have been cultivated. Although the north-eastern portion of the site was incorporated within the Benevolent Asylum site from 1821, historical maps do not suggest that any structures were erected in this location. Mid-19th century maps (Figure 13-Figure 15) reveal that a train line and unidentified structure occupied the southern portion of the subject site during this period. The remainder of the site remained undeveloped until its resumption for the redevelopment of Central Station in 1900.

The subject site has been subject to high levels of disturbance from the early 20th century onwards. The construction of the Devonshire Street tunnel in 1903 and its extension westwards in the 1970s resulted in significant disturbance to the subject site. Photographs from the 1970s (Figure 16 & Figure 17) show the ground level to the south of the Parcels Post Building roughly equivalent with that of the basement level. In 1911 work commenced on the Parcels Post Building within the northern portion of the subject site. This included excavation of the soil profile to a depth of 2 metres to accommodate a basement level which occupies the whole building footprint (Figure 39). By 2005 an outdoor pool had been installed to the east of the former Parcels Post Building, resulting in additional subsurface disturbance, and in 1998-2000 the space between the Devonshire tunnel entrance and George Street extension to the north-west had been excavated down to 2.8 metres below street level to form Henry Deane Plaza.

These 20th century developments suggest that the majority of the subject site has been subject to high levels of subsurface disturbance. The exception may be a portion of the site within the north-eastern corner, and within the vicinity of the outdoor pool, where moderate levels of disturbance have been identified.



Figure 37 – South-western elevation of former Parcels Post Building.

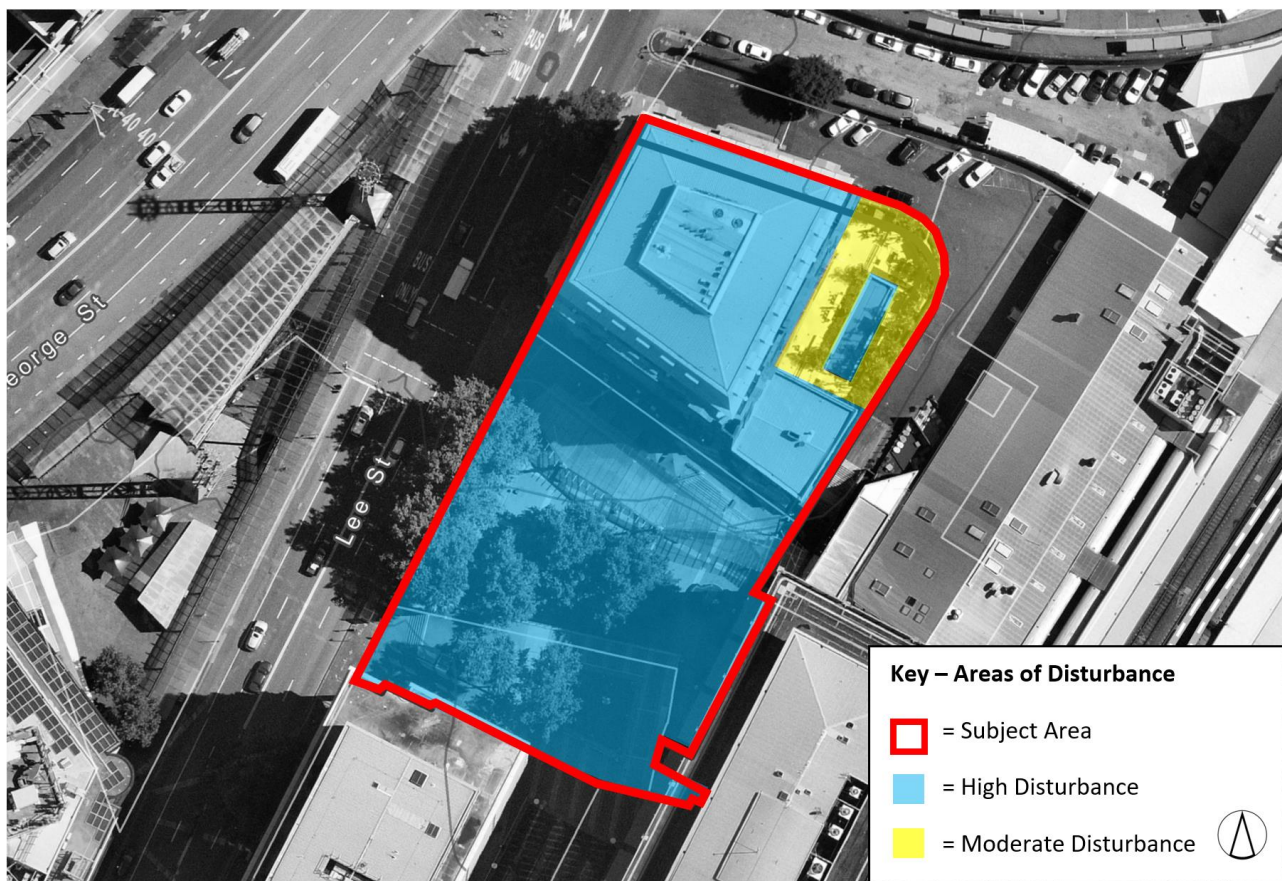


Figure 38 – Map of historical disturbance within the subject site.

4.3. DISCUSSION OF ARCHAEOLOGICAL POTENTIAL

During the earliest period of European settlement (1788-1821), the subject site was located on the periphery of the Sydney settlement. Toward the end of this phase the land to the north-east of the subject site was cleared and/or reclaimed for the purpose of establishing the Benevolent Asylum. It is likely that the subject site was also cleared during this period, however, evidence of these activities is unlikely to survive in light of subsequent disturbance.

In 1821 the Benevolent Society Asylum was constructed to the north of the subject site. While historical overlays indicate that structures associated with this complex were located outside the curtilage of the subject site, the north-eastern portion of the site was incorporated within the Asylum site. Although this portion of the site has been subject to disturbance associated with the construction of the Parcels Post Building, there may be some potential for artefacts and occupational deposits associated with the Asylum's operations in this location. The remainder of the subject site was incorporated within the Government Paddocks at this time. By the mid-19th century, a section of railway transected the south-western portion of the site and an unidentified structure, located on the eastern boundary, can be observed in the 1855-1865 Trigonometrical Survey (Figure 13). Evidence of these features is likely to have been removed during the construction of Henry Deane Plaza in 1998-2000.

In 1900 the subject site was resumed for the construction of Central Station. The Benevolent Asylum, Carter's Barracks and Devonshire Street Cemetery were subsequently demolished. Demolition layers and features associated with the Benevolent Asylum, have been uncovered in archaeological excavations undertaken within the vicinity of the subject site.

Between 1903-1906 the Devonshire Street tunnel was constructed to the south of the Parcels Post Building. In the 1970s the Devonshire Street tunnel was extended to the western side of George Street. Historic images from this period (Figure 14 & Figure 15) show high levels of disturbance within the subject site, with significant excavation undertaken to establish the descent from Lee Street to the tunnel entrance. The tunnel footprint incorporates a number of retail tenancies which extend beneath the historical ground level. These

significantly impactful works are likely to have removed any evidence of former Railway activities within this area.

In May 1911 construction of the Parcels Post Building commenced on the former railway lands within the northern portion of the subject site. The soil profile was excavated to a depth of 2 metres to accommodate a basement level. The southern portion of the subject site contained the West Carriage Shed, support offices, demountable workshops and a store (Figure 19-Figure 21). A number of small ancillary structures can also be observed to the south and east of the former Parcels Post Building between 1949-1986 (Figure 24 & Figure 25). By 1998 all structures within the southern portion of the site had been demolished. The extensive excavation works associated with the Devonshire Street Tunnel (1903-1970s) and Henry Deane Plaza (1998-2000) are likely to have removed any footings or foundations which may have survived the demolition process. These buildings are unlikely to have contained basement levels or extensive subsurface infrastructure located at depths greater than 2.8 metres below street level (the approximate ground level of the Plaza which was subsequently established in this location). Likewise, landscaping within the vicinity of the Parcels Post Building, including an outdoor swimming pool, is likely to have removed evidence of the relatively ephemeral ancillary structures.

The above discussion reveals that there were few significant developments within the subject site prior to the construction of the Devonshire Street tunnel (1903-1906), Parcels Post Building (1911) and Henry Deane Plaza (1998-2000); all of which remain extant. Evidence of the former Benevolent Asylum (1821), including artefacts and occupational deposits, may survive within the north-eastern portion of the site. This area has, however, been subject to landscaping works and the installation of an outdoor pool, which are likely to have removed or impacted any subsurface remains. Likewise, the significant degree of disturbance associated with the construction of the Devonshire Street Tunnel and Henry Dean Plaza is likely to have removed evidence of any earlier railway structures or infrastructure within the southern portion of the subject site.

4.4. SUMMARY OF ARCHAEOLOGICAL POTENTIAL

An assessment of archaeological potential associated with each phase of development of the subject site is provide in Table 5 below. The assessment of archaeological potential within the subject site is mapped in Figure 41.

Table 5 – Assessment of Archaeological Potential

Phase	Potential Archaeological Resource	Integrity	Archaeological Potential
1. Initial European Settlement 1788-1821	Evidence of landscaping and vegetation clearance associated with the Asylum.	<p>Until 1818 the subject site consisted of low-lying swampland on the periphery of the Sydney settlement. There is no indication that any permanent structures were erected within the site during this period.</p> <p>In 1818 the area to the north-east of the subject site, today occupied by Central Station, was cleared to make way for a Benevolent Asylum (indicated as '55' in Figure 9) and a cemetery. Evidence of these activities is likely to have been removed in association with the construction of the former Parcels Post Building, Henry Deane Plaza and Devonshire Street tunnel.</p>	Low-Nil
2. Benevolent Society Asylum 1821-1902	Casual finds and occupational deposits associated with the Asylum.	The Benevolent Society Asylum was constructed to the north-east of the subject site between 1819-1821. Historical maps (Figure 13 & Figure 14) indicate that, whereas the buildings associated with the Asylum were located outside the curtilage of the subject site, the north-eastern portion of the site was incorporated within the former Asylum boundary. Evidence of the Asylum is likely to have been removed in association with the construction of the Parcels Post Building, as well as landscaping works and the installation of a pool to the north-east of the building.	Low
	Landscaping and fabric of the former railway line.	The southern portion of the subject site remained incorporated within the Government Paddocks until 1900 when it was resumed for the construction of Central Railway Station. By the mid-19 th century a section of railway transected the south-western portion of the site. The southern portion of the subject site remained vacant with the exception of an unidentified structure in the south-eastern portion of the site which can be	Nil-Low

Phase	Potential Archaeological Resource	Integrity	Archaeological Potential
		observed in the 1855-1865 Trigonometrical Survey (Figure 13). Evidence of this structure is likely to have been removed in association with the construction of Henry Deane Plaza.	
3. Central Station Railway 1900-1970s	Demolition materials, tools, machinery and railway infrastructure.	<p>In December 1900 it was decided that the new station would be constructed on the Devonshire Street site, requiring the demolition of the Benevolent Asylum, Carters Barracks, Police Barracks and Devonshire Street Cemetery, as well as other buildings on the block. Evidence of this construction event, including demolition layers and features associated with the Benevolent Asylum, have been uncovered on archaeological excavations undertaken in the subject site vicinity.</p> <p>The remainder of the subject site was used for storage purposes to support the railyards. Excavation for the basement of the Parcels Post Building and Henry Deane Plaza is likely to have removed evidence of these activities.</p>	Low-Moderate
	Devonshire Street tunnel (extant).	<p>The Devonshire Street tunnel was constructed within the central portion of the subject site between 1903-1906.</p> <p>In the 1970s the Devonshire Street tunnel was extended to the western side of George Street. Historic images from this period (Figure 14 & Figure 15) show high levels of disturbance within the subject site. Significant excavation was undertaken to establish the descent from Lee Street to the tunnel entrance. The tunnel remains extant.</p>	High (extant).
4. Parcels Post Office 1911-1998	Parcel Post building (extant).	In May 1911 construction of the Parcels Post Building commenced on the former railway lands to the north of the Devonshire Street Subway. The soil profile was excavated to a depth of 2 metres to accommodate the basement level, decreasing the archaeological potential in this location. The	High (extant).

Phase	Potential Archaeological Resource	Integrity	Archaeological Potential
		Adina apartments now occupy the former Parcels Post Building.	
	Footings and foundations of West Carriage Shed, support offices, demountable workshops and store.	<p>The southern section of the subject site, now occupied by the Henry Deane Plaza, contained for most of the twentieth century a number of structures including the West Carriage Shed, support offices, demountable workshops and a store. Aerial photographs (Figure 19-Figure 21) reveal that the large saw-toothed West Carriage Shed occupied most of the southern portion of the site. A number of smaller ancillary structures can also be observed to the east and south of the former Parcels Post Building in the 1949 (Figure 24) and 1986 (Figure 25) aeriels respectively. By c.1998 these structures had been demolished.</p> <p>The extensive excavation works associated with Henry Deane Plaza (1998) are likely to have removed evidence of the former West Carriage Shed and associated structures. Likewise, landscaping within the vicinity of the Parcels Post Building is likely to have removed evidence of the relatively ephemeral structures in this location.</p>	Low
5. Adina Apartments & Henry Deane Plaza 1998-Present	Henry Deane Plaza (extant).	Henry Deane Plaza was constructed between 1998-2000 between Railway Square bus station and the Devonshire Street Tunnel entrance to Central Station. The plaza is approximately 2.8 m below street level, suggesting a high level of ground disturbance in this location.	High (extant).



Figure 39 – Archaeological potential of subject site based on historical overlays. Note the footprint of the Devonshire Street Tunnel (1844), an unidentified structure (1855-1865) and the West Carriage Shed (1951) within the curtilage of the subject site.

5. SIGNIFICANCE ASSESSMENT

5.1. FRAMEWORK FOR ASSESSMENT

The concept of archaeological significance is independent of archaeological potential. For example, there may be 'low potential' for certain relics to survive, but if they do, they may be assessed as being of (State) significance.

Archaeological significance has long been accepted as linked directly to archaeological (or scientific) research potential: a site or resource is said to be scientifically significant when its further study may be expected to help answer questions. Whilst the research potential of an archaeological site is an essential consideration, it is one of a number of potential heritage values which a site or 'relic' may possess. Recent changes to the *Heritage Act 1977* (Section 33(3) (a)) reflect this broader understanding of what constitutes archaeological significance by making it imperative that more than one criterion be considered.

The below assessment of archaeological significance considers the criteria, as outlined in the NSW Heritage Branch publication *Assessing Significance for Historical Archaeological Sites and 'Relics'*. Sections which are extracted verbatim from this document are italicized.

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

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

5.2. ASSESSMENT OF SIGNIFICANCE

An assessment of archaeological significance associated with each phase of development of the subject site is provided below.

Criterion (a): Historic Significance - (evolution)

an item is important in the course, or pattern, of NSW's cultural or natural history (or the cultural or natural history of the local area).

Should high integrity archaeological resources associated with the former Benevolent Asylum be located within the north-eastern portion of the subject site, these may have State significance for their ability to reflect the early development of social welfare services within the NSW colony.

Intact and legible evidence of the former saw-toothed West Carriage Shed, offices and demountable workshops within the southern portion of the subject site may meet the threshold for local significance for its ability to reflect the earliest historical configuration of Central Station.

Evidence of the ancillary structures within the vicinity of the Parcels Post Building are unlikely to meet the threshold for either local or State significance under this criterion.

Criterion (b): Associative Significance - (association)

an item has strong or special association with the life or works of a person, or group of persons, or importance in NSW's cultural or natural history (or the cultural or natural history of the local area).

The Benevolent Society movement was pioneered by journalist Edward Smith Hall in the early 19th century and eventually resulted in Governor Macquarie's commissioning of the Benevolent Asylum within the northern portion of the subject site in 1821. Should evidence of the former Benevolent Asylum be located within the north-eastern portion of the subject site, however, it would be unlikely demonstrate a firm association with either of these individuals or with the movement more broadly.

Criterion (c): Aesthetic Significance - (scenic qualities / creative accomplishments)

An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (or the cultural or natural history of the local area).

No evidence has come to light which satisfies this criterion.

Criterion (e): Technical/Research Significance - (archaeological, educational, research potential and scientific values)

an item has potential to yield information that will contribute to an understanding of NSW's cultural or natural history (or the cultural or natural history of the local area).

Should evidence of the former Benevolent Asylum be located within the north-eastern portion of the subject site, this may have some research value for its ability to provide additional information about the various groups which were accommodated at this location over the eight decades of its operation.

Evidence of the former warehouse and ancillary structures are unlikely to satisfy this criterion on the grounds that they were peripheral to their respective facilities' operations and relate to a period which is well-documented.

Criterion (f): Rarity

an item possesses uncommon, rare or endangered aspects of NSW's cultural or natural history (or the cultural or natural history of the local area).

Archaeological resources associated with the former Benevolent Asylum may possess rarity at a state level on the grounds that they may evidence the first Benevolent Asylum established within the Sydney colony, and for which few historical sources survive.

Archaeological resources associated with the former warehouse and ancillary structures are unlikely to satisfy this criterion on the grounds that they do not represent rare examples of rail and mail infrastructure for their respective periods.

Criterion (g): Representativeness

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

A number of Benevolent Asylums were established throughout Sydney in the latter part of the 19th century. Artefacts retrieved from the subject site which demonstrate a clear connection with the former Benevolent Asylum may possess similar characteristics to those which may be retrieved from other Asylum sites. If this can be demonstrated, they may possess significance at a state level.

5.3. STATEMENT OF SIGNIFICANCE

Should high integrity archaeological resources associated with the former Benevolent Asylum be located within the north-eastern portion of the subject site, these may have State significance for their ability to reflect the first Benevolent Asylum and development of social welfare services within the NSW colony. Artefacts and occupational deposits may provide additional information about the various groups which were accommodated at this location over the eight decades of its operation which cannot be obtained through historical sources. Artefacts may likewise possess similar characteristics to those from other Asylum sites which date to the latter part of the 19th century. If this can be demonstrated, they may possess significance at a state level.

Evidence of the West Carriage Shed, offices and demountable workshops are unlikely to meet the threshold for State significance on the grounds that they were peripheral to their respective facilities' operations and do not represent rare or remarkable examples of rail and mail infrastructure for their respective periods. Should legible and intact evidence of the former saw-toothed warehouse be exposed, this may meet the threshold for local significance for its ability to reflect the earliest historical configuration of Central Station.

6. IMPACT ASSESSMENT

The following is an assessment of the likely impact of the proposed works on potential archaeological resources within the subject site.

The proposed works consist of demolition and construction works to facilitate the adaptive re-use of the extant former Parcels Post Building and construction of additional hotel and commercial office tower above and adjacent to the building (full description of works in Section 1.2). Existing building plans identify basement level as present to FRL 13.48m (5.1m below ground level of FRL 18.58) with additional excavation for footings to unknown depth. It is likely that this existing basement level has completely disturbed and removed any previously accumulated archaeological deposits. The current proposal intends to extend basement levels with additional excavation to of RL 0.900, being approximately 15.1m below ground level of RL 16.000. Should any archaeological deposits have survived including deep features below the extant basement, this additional excavation will result in their removal. However, no deep features have been identified in this assessment as likely to occur.

Given the high level of disturbance across the site resulting from the extant basement, construction of the Devonshire Street tunnel and construction of Henry Deane Plaza, it is unlikely that any archaeological resources would survive within the subject site. However, if discrete deposits did occur in areas of lesser disturbance, they would likely be totally removed by excavation for the proposed basement levels.

To mitigate harm to potential relics resulting from the subject site, Urbis have provided an Unexpected Finds Procedure (UFP) as outlined in Section 7. The UFP operates in tandem with the Archaeological Induction, to ensure contractors on site are equipped to identify potential archaeological resources should they occur.

Should potential relics be identified during the works, in accordance with this UFP works should cease in this area and a suitably qualified archaeologist notified. A section 146 notification should also be submitted to Heritage NSW to notify of the suspected relic.. A significance assessment should be undertaken, including addendum to the current report if required. Further action as required will be confirmed on site. In the event that the unexpected find is determined to be a relic of Local or State significance, further management protocols should be implemented, including the following:

- Archaeological Research Design and Methodology to be prepared.
- Archaeological monitoring of future ground works within the area of the relic.
- Archaeological test excavation within the area of the identified relic.
- Open area/salvage excavation (should it be identified that there is potential for further relics of heritage significance to occur).
- Interpretation of the relic in an updated Heritage Interpretation Plan.

If the find is identified to be a relic of State significance, in situ retention is likely to be required, dependent on the integrity of the find.

7. CONCLUSIONS & RECOMMENDATIONS

The HAA has concluded the following in relation to the historical archaeological potential and significance of the subject site and the impacts of the proposed works:

- The subject site has **nil-low** potential to contain archaeological relics associated with early phases of occupation at the subject site, including initial settlement and the Benevolent Society.
- The subject site has **low-moderate** potential to contain archaeological resources associated with the later phases of occupation at the site, including Central Railway Station and the former Parcels Post Building. Extant structures have likely removed any previously accumulated deposits through high levels of disturbance.
- Archaeological resources associated with the Benevolent Asylum, which are unlikely to occur although some resources may be retained in the form of structural remains in the north-eastern portion of the site, may be considered of State significance for their association with the first Benevolent Asylum and the development of social welfare services.
- Archaeological resources associated with the Central Railway Station, being structural remains of the West Carriage Shed, are unlikely to occur. If these resources are present, they would likely be considered significance on a Local level for their association with the historic development of Central Railway Station.
- The proposed works are unlikely to impact historical archaeological relics due to the high levels of disturbance which have occurred previously at the site and are likely to have removed previously accumulated deposits. Should relics occur, proposed basement excavation to RL 0.900 (15.1m) will result in the removal of these relics.

In view of the above conclusions, Urbis makes the following recommendations:

Recommendation 1 – Unexpected Finds Procedure

For proposed surface disturbance the following Unexpected Finds Procedure should be implemented. This should be included in the Construction Management Plan for the site and all contractors should be made aware of this procedure.

6. All works must stop in the immediate vicinity of the find. The find must remain undisturbed and temporary fencing established around the find.
7. The Site Supervisor, or another nominated site representative must contact an appropriately qualified archaeologist.
8. The archaeologist should examine the find, provide a preliminary assessment of significance based on the findings of this HAIA, record the item and decide on an appropriate management strategy as identified in Section 6. Heritage NSW should be notified of the identification of the find by the archaeologist, through the submission of a Section 146 notification on the Heritage Management System (HMS).
9. Depending on the significance of the find, re-assessment of the archaeological potential of the area may be required, and further archaeological investigation required. This may also require consideration of in-situ retention and conservation, as well as interpretation.
10. Works in the vicinity of the find can only recommence upon on the written advice of the archaeologist.

Recommendation 2 – Archaeological Induction

Prior to the commencement of works, an archaeological induction should be delivered by Urbis to all relevant construction personnel for the purpose of establishing:

- heritage obligations of all project personnel;
- how to identify archaeological relics of State or local significance;
- what to do in the event that potential relics are uncovered; and
- how the Unexpected Finds Procedure works in practice.

8. REFERENCES

Australia ICOMOS Incorporated, 2013. *The Burra Charter, The Australia ICOMOS Charter for Places of Cultural Significance*.

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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.

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