

# 17-23 Talavera Road, Macquarie Park

Statement of Heritage Impact and Non-Aboriginal (Historic) Archaeological Assessment

Report to GIDDIS

October 2021

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Artefact Heritage ABN 73 144 973 526 Level 4, Building B 35 Saunders Street Pyrmont NSW 2009 Australia

+61 2 9518 8411 office@artefact.net.au

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# EXECUTIVE SUMMARY

This Statement of Heritage Impact and Non-Aboriginal (Historic) Archaeological Assessment has been prepared by Artefact Heritage on behalf of Macquarie Data Centres (MDC) C/- GIDDIS Project Management.

The following *Statement of Heritage Impact and Non-Aboriginal (Historic) Archaeological Assessment* has been produced to support the Environmental Impact Statement (EIS) prepared by Willowtree Planning PTY Ltd (Willowtree Planning).

The EIS has been submitted to the New South Wales (NSW) Department of Planning, Industry and Environment (DPIE), in support of an application for State Significant Development (SSD), for the construction and operation of a data centre, involving earth works, provision of infrastructure and expansion of an existing data centre at 17 - 23 Talavera Road, Macquarie Park (Lot 527 DP 752035).

The proposal represents an extension to the approved data centre (LDA/2018/0322) to allow for additional data storage capacity at the subject site, improving the overall operational efficiencies and provision of technology services to customers and the wider locality.

The proposal involves the construction and operation of an expansion to an existing data centre located at 17-23 Talavera Road, Macquarie Park (Lot 527 in DP 752035), comprising:

- a five-storey building
- ancillary office space and staff amenities
- a back-up power system
- associated infrastructure, car parking, loading docks and landscaping

The subject site is located within the City of Ryde Local Government Area (LGA). The proposal seeks to operate 24 hours per day, seven (7) days per week.

The particulars of this proposal are summarised below:

- Minor earthworks involving cut and fill works
- Infrastructure comprising civil works and utilities servicing
- Construction of a five (5) storey building extension, comprising up to:
  - 14 data halls
  - 18 back up generators
  - Fitout of the building for use as a data centre (on an as-needs basis)

#### Conclusions

This report concludes that:

- No listed heritage items are to be impacted by the proposed works
- There is low potential that significant archaeological remains are present within the study area.

# Recommendations

During construction works, it is recommended that:

- An Unexpected Finds Policy is developed in the unlikely event that relics are identified during ground disturbing works.
- All relevant staff, contractors and subcontractors should be made aware of their statutory obligations for heritage under the NSW Heritage Act 1977 and best practice as outlined in The Burra Charter 2013. This may be implemented as a heritage induction.

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# 1.0 INTRODUCTION

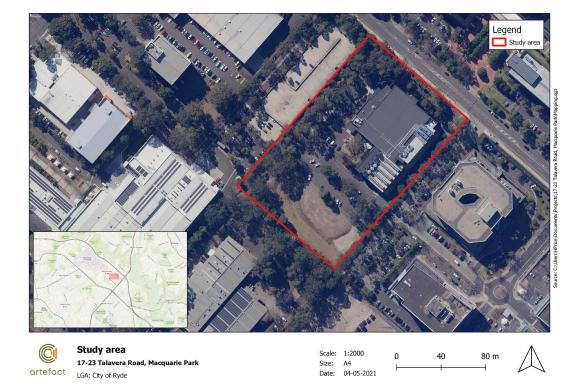
## 1.1 Background and study area location

Artefact Heritage has been engaged by GIDDIS to complete a *Statement of Heritage Impact (SoHI) and Non-Aboriginal (Historic) Archaeological Assessment* for an extension of Macquarie Data Centres facility located at Lot 527 DP 752035 17-23 Talavera Road, Macquarie Park.

The study area is located in the City of Ryde Local Government Area (LGA) and within the Parish of Hunters Hill located in Cumberland County (Figure 1).

The proposed development will extend the current Macquarie Data Centre facility which is on the site. The project aims are to increase the footprint of the building to at least 5000m2. Current approvals are shown in green and the extended proposed footprint is outlined in orange.

GIDDES have engaged Artefact Heritage to complete this *SoHI and Non-Aboriginal (Historic) Archaeological Assessment* for the study area to indicate if the proposed works will impact listed items, affect any areas of archaeological potential or impact relics.



#### Figure 1: Location of the study area



#### Figure 2: Proposed approved ICW footprint and proposed enlarged IC3 footprint



# 1.2 Report limitations

This report assesses non-Aboriginal (historical) archaeological and built heritage resources only and does not provide a review of the potential for Aboriginal archaeological evidence in the area.

### 1.3 Authorship and acknowledgements

This report has been prepared by HollyMae Steane Price (Heritage Consultant). Management input and review was provided by Dr Sandra Wallace (Director).



# 2.0 LEGISLATIVE CONTEXT

# 2.1 Heritage Act 1977 (NSW)

The NSW *Heritage Act 1977* (Heritage Act) provides protection for items of 'environmental heritage' in NSW. 'Environmental heritage' includes places, buildings, works, relics, movable objects or precincts considered significant based on historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic values. Items considered to be significant to the State are listed on the State Heritage Register (SHR) and cannot be demolished, altered, moved or damaged, or their significance altered without approval from the Heritage Council of NSW.

#### 2.1.1 State Heritage Register

The SHR was established under Section 22 of the *Heritage Act* and is a list of places and objects of particular importance to the people of NSW, including archaeological sites. The SHR is administered by the Heritage NSW and includes a diverse range of over 1500 items, in both private and public ownership. To be listed, an item must be deemed to be of heritage significance for the whole of NSW.

The study area for the current assessment does not contain any items listed on the SHR.

#### 2.1.2 Section 170 Registers

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

The study area for the current assessment does not contain any items listed on Section 170 Registers.

### 2.2 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) establishes the framework for cultural heritage values to be formally assessed in the land use planning and development consent process. The EP&A Act consists of three main parts of direct relevance to Aboriginal cultural heritage; Part 3 which governs the preparation of planning instruments, Part 4 which relates to development assessment processes for local government (consent) authorities, and Part 5 which relates to activity approvals by governing (determining) authorities.

Planning decisions within LGAs are guided by Local Environmental Plans (LEPs). Each LGA is required to develop and maintain and LEP that includes Aboriginal and historical heritage items which are protected under the EP&A Act and the *Heritage Act 1977*. The study area is located in the City of Ryde LGA and is subject to consents under the Ryde LEP 2012.

Under Part 5, Clause 5.10 (2), development consent is therefore required for:



(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

(d) disturbing or excavating an Aboriginal place of heritage significance.

The project has been approved as an SSD by the Minister of Planning in line with requirements set out in the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation).

The table below shows the SEARS requirement for the SSD.

#### **Table 1. SEARS requirement**

SEARS Requirements	Report Section
Non-Aboriginal cultural heritage	
Including an assessment of potential impacts on non-Aboriginal cultural heritage items and values on the site and/or in the surrounding area.	Section 4.

#### 2.2.1 Local Legislation

#### **Ryde Local Environmental Plan 2014**

The environmental planning instrument that applies to the study area is the Ryde LEP 2014. The instrument is relevant in relation to the control of development with regard to heritage within the City of Ryde Council area. The relevant clauses of the RLEP 2014 state (NSW Government 2014):

(1) Objectives The objectives of this clause are as follows:

(a) to conserve the environmental heritage of Ryde,

(b) to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,

(2) Requirement for consent Development consent is required for any of the following:

(a) demolishing or moving any of the following or altering the exterior of any of the following (including, in the case of a building, making changes to its detail, fabric, finish or appearance):

(i) a heritage item,

(4) Effect of proposed development on heritage significance The consent authority must, before granting consent under this clause in respect of a heritage item or heritage conservation area, consider the effect of the proposed development on the heritage significance of the item or area concerned. This subclause applies regardless of whether a heritage management document is prepared under subclause (5) or a heritage conservation management plan is submitted under subclause (6).



(5) Heritage assessment

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

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

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

(c) on land that is within the vicinity of land referred to in paragraph (a) or (b),

require a heritage management document to be prepared that assesses the extent to which the carrying out of the proposed development would affect the heritage significance of the heritage item or heritage conservation area concerned.

#### 2.2.2 Non-Statutory Considerations

#### **Register of the National Estate**

The Register of the National Estate (RNE) is no longer a statutory list; however, it remains available as an archive.

There are no items listed on the RNE within the study area nor within 200m of the study area that would be affected by the proposed activity.

#### National Trust of Australia (NSW)

Listing on the National Trust Heritage Register does not impose statutory obligations and is more an indication in which the item is held by the heritage community.

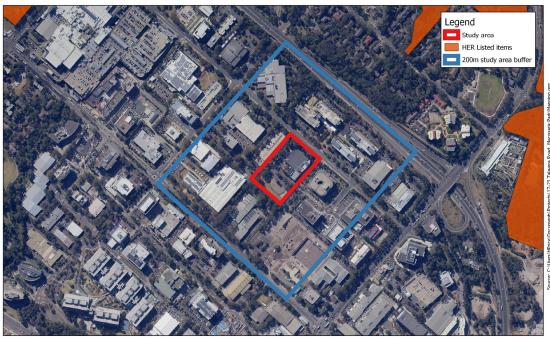
There are no items listed on the National Trust within the study area nor within 200m of the study area that would be affected by the proposed activity.

### 2.3 Heritage Listings

A search of all relevant heritage registers was undertaken on 4 May 2021. The study area includes no heritage listed items. There are no heritage listed items within 200m of the study area (Figure 3).



Figure 3: Study area with 200m buffer zone in relation to heritage listings





Map showing no listed items within 200m buffer around study area 17-23 Talavera Road, Macquarie Park LGA: City of Ryde

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# 3.0 ENVIRONMENTAL AND HISTORICAL CONTEXT

# 3.1 Environmental Context

The major geological elements of the Lane Cove River valley are Hawkesbury Sandstone and the Wianamatta Group of sedimentary rocks, predominantly Ashfield shale. Hawkesbury sandstone is a coarse-grained sedimentary rock consisting mainly of quartz particles, with smaller quantities of claystone grains. Hawkesbury Sandstone weathers to form thin, sandy soils with low water-retaining qualities. This soil type is commonly located along the ridgelines and mid slopes of the valley such as at the study area. These nutrient-poor soils are highly erodible and hence are extremely susceptible to disturbance.

Vegetation at the time of first European colonisation would have comprised Sydney Turpentine-Ironbark Forest. This is an open forest, with dominant canopy trees including Turpentine *Syncarpia glomulifera*, Grey Gum *Eucalyptus punctata*, Grey Ironbark *E. paniculata* and Thin-leaved Stringybark *E. eugenoides*. The shrub stratum is usually sparse.

Australian sea levels have varied markedly over the past 10,000 years, from a low point of 15m below current seal levels at approximately 7,900 years ago, to a high point of approximately 1.5m above current sea level. This higher level lasted until about 2,000 years ago<sup>1</sup>. This has resulted in considerable coastline variation over time. Many coastal and riverside areas that are currently dryland were inundated during the time that Aboriginal people have inhabited the continent.

The study area is located less than 1km to the south west of Lane Cove River and is at the eastern side of the suburb Macquarie Park. It is to the east of Marsfield and to the north of North Ryde.

# 3.2 Aboriginal land use

Assumptions about land use patterns are made on the basis of archaeological information gained from the local area, from observations made by the Europeans after settlement of the area, and from information known about available natural resources.

As Aboriginal people were mobile hunter-gatherers, it is likely that they moved across the landscape between resources. It is also likely that movement was related to socio/cultural factors such as gatherings and ceremonial obligations. Campsites would have provided temporary residences such as bark structures. It is difficult to ascertain whether a campsite existed at a given location, but correlations between stone artefact density and campsites are often assumed. While it is likely that knapping would have occurred at a campsite, it is also likely that knapping would have occurred at a campsite, it is also likely that knapping would have occurred during movement across the landscape, as tools were prepared or repaired during hunting and gathering activities.

#### 3.2.1 Aboriginal ethno-historic context

The study area falls within the country of the Guringai and Darug language groups. Aboriginal people were highly mobile hunter-gatherers utilising different landform units and resource zones. Different resources may have been available seasonally, necessitating movement or trade across the

<sup>1</sup> Sloss, C., Jones, B., & Murray-Wallace, C. (2007). Holocene sea-level change on the southeast coast of Australia: A review. *The Holocene 17* (7), 999-1014

landscape.<sup>2</sup> European expansion throughout the Sydney region displaced Aboriginal people from their traditional land and effectively cut off access to many resources.

European settlement was devastating to the Aboriginal people living along the Lane Cove River. Land was cleared for farms and forests were cut down to provide fuel and building materials. Aboriginal people lost access to their camping and food gathering areas and were forced into neighbouring groups' country. In the first decade of European settlement, at least two serious outbreaks of imported disease decimated the Aboriginal population.<sup>3</sup>

In 1797 the Aboriginal community of the Lane Cove River valley were actively resisting the new settlers and were reported as responsible for burning a house and killing some hogs. 'Native raiders' were mentioned in 1804 and 1809, but there are no contemporary references to Aboriginal people living in the valley in the 19th century.

Much evidence of Aboriginal occupation of the Lane Cove River valley has been lost due to the history of European occupation and use of the valley for farming and recreation. The construction of the Lane Cove weir, which flooded much of the riverbanks, probably destroyed many Aboriginal sites.<sup>4</sup>

## 3.3 Early European Settlement (1788-1870)

European colonisation of the Ryde area began in 1792, when eight Marines were granted land with a frontage on Parramatta River. This area was called the Field of Mars, and by 1796 had extended to include much of North Ryde (then known as the Northern Bush) and the area now known as Macquarie Park. A large area of land along the Lane Cove River remained vacant and was set aside for the common use of all residents. Called the Field of Mars Common, this land was used by settlers to graze their animals and encompassed the study area.<sup>5</sup>

<sup>2</sup> Attenbrow, V. (2010). *Sydney's Aboriginal Past: Investigating the Archaeological and Historical Records.* Sydney: University of New South Wales Press

<sup>3</sup> Lenehan, M. (1987). *Footprints on the Sands of Time Lane Cove 1788–1988*. Lane Cove Historical Society: Lane Cove

<sup>&</sup>lt;sup>4</sup> OEH. (2016). Plan of Management Lane Cove National Park. Sydney: Office of Environment & Heritage NSW.

<sup>&</sup>lt;sup>5</sup> Redding, G (1986) A History of North Ryde, 1850 – 1950, NSW: Allambie (7-8)

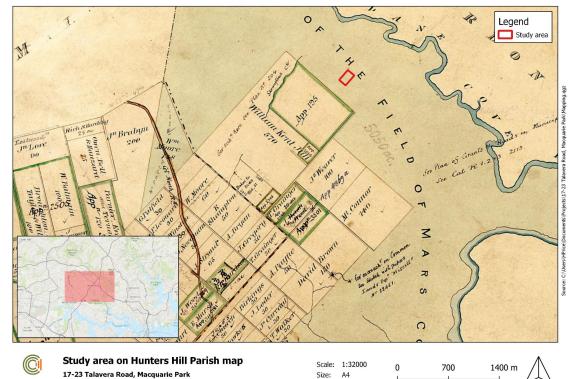


Figure 4: Parish map of Hunters Hill showing the Field of Mars Common, cancelled 1881 (Source: Lands Department, Historical Land Records Viewer)

The study area was initially part of the Field of Mars Commons, which was formally set aside for the use of all residents in 1804<sup>6</sup>. An 1849 survey found that the Commons covered 6,235 acres, and it was roughly one mile wide and extended from Boronia Park to North Epping and Pennant Hills and included a substantial amount of North Ryde (Redding 1986:8).

Date:

05-05-2021

# 3.4 Field of Mars common land sales (1870-1900)

In 1874, under "The Field of Mars Common Resumption Act" (Figure 5), a portion of the Common was surveyed and a plan made with roads, reserves and allotments marked. The gradual subdivision and sale of the Field of Mars Commons began in 1885 and continued until 1900. In September 1889, all of the parcels of land within the study area were put up for public auction in Sydney. Some of the lots sold immediately, while others were purchased later in 1898. It can be safely assumed that no major structures were located within the study area prior to this time.

<sup>6</sup> Field of Mars Common

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LGA: City of Ryde

https://dictionaryofsydney.org/place/field\_of\_mars\_common#:~:text=lt%20remained%20undeveloped%20until%2 0the,Field%20of%20Mars%20Wildlife%20Refuge. (accessed 05/05/21)



### Figure 5: Field of Mars Resumption auction advert (western part)

The alignment of roads running through the area has changed relatively little since 1898. The current M2 Motorway follows the route of Pittwater Road. Talavera Road – so named in 1969<sup>7</sup> - was originally named Vittoria Road, and was renamed Bennie Street in 1968<sup>8</sup>. Waterloo Road to the south west, Khartoum Road to the north west, and Lane Cove Road to the south east have retained their names throughout.

The study area covers a complete plot that was owned by Ann Jane Kingsmill whose husband William Henry Kingsmill had died in Mudgee 1894 at the of 36. No further background information could be found about the Kingsmills though it appears that Ann was the landowner until her death on 24 August 1947.<sup>9</sup>

No record of construction activities within the study area have been found, although this does not mean that no construction was undertaken on the land during this period. It appears that many of the lots in the area were developed as market gardens and smallholdings.

<sup>&</sup>lt;sup>7</sup> <u>https://trove.nla.gov.au/newspaper/article/219994276?searchTerm=%22bennie%20street%22</u> (accessed 05/05/21)

<sup>&</sup>lt;sup>8</sup> <u>https://trove.nla.gov.au/newspaper/article/220062553?searchTerm=vittoria%20road%20ryde</u> (accessed 05/05/21)

<sup>&</sup>lt;sup>9</sup> <u>https://trove.nla.gov.au/newspaper/article/224773091?searchTerm=%22ann%20jane%20kingsmill%22</u> (accessed 05/05/21)



#### Twentieth century (1900-Present) 3.5

The continuation of land use as market gardens and smallholdings is evidenced by the 1943 aerial photography of the area. The imagery shows a series of plots each with a small series of buildings (Figure 7). Each plot appears to be covered with garden plots and vegetation and, within the study area, what looks like a small earthen reservoir for water.

In 1963 the NSW Government announced the purchase of a large portion of land at the northern end of the North Ryde Green Belt for purpose of developing a new University Campus. The need for a third university in Sydney had arisen as growing student numbers within the rapidly increasing postwar population were placing increasing pressure on the facilities at Sydney University and UNSW.<sup>10</sup> In 1964 it was announced that the new centre would be known as Macquarie University.

Macquarie Park was gazetted from North Ryde in 1999 and was so named due to the University. The area was concurrently developed as the 'Macquarie Park Employment Area' with a view to create a hi-tech industrial estate surrounding the university, allowing for interaction between the university and leading partners in industry.

<sup>&</sup>lt;sup>10</sup> Graham Brookes and Associates Pty Ltd, October 2007, 7.

Figure 7: Study area in 1943 aerial photography showing market gardens



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17-23 Talavera Road, Macquarie Park LGA: City of Ryde

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# 4.0 NON-ABORIGINAL (HISTORIC) ARCHAEOLOGICAL ASSESSMENT

## 4.1 Methodology

Historical archaeological potential is assessed by identifying former land uses and associated features through historical research and evaluating whether subsequent actions (either natural or human) may have impacted on evidence for these former land uses.

Consideration of archaeological research potential is required when undertaking a significance assessment of an historical archaeological site. Bickford and Sullivan developed three questions to assess the research potential of an archaeological resource<sup>11</sup>.

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

The Heritage Division of the Office of Environment and Heritage (OEH now Heritage NSW) issued a new set of guidelines in 2009: *Assessing Significance for Historical Archaeological Sites and 'Relics'*. These guidelines call for broader consideration of multiple values of archaeological sites beyond their research potential. The following section presents a discussion of the potential archaeological resource's research potential and an assessment against the NSW heritage significance criteria.

# 4.2 Physical site description

The study area block is flanked on the north west side by Khartoum Road, on the south east side by Lane Cove Road, and on the south west by Waterloo Road. Talavera Road runs along the north east side of the block. The study area is located within the north half of the block and in the centre. The entire locality is a hi-tech industrial area and the lots surrounding the study area are all occupied by large industrial and office buildings.

Temporary work structures have already been put in place.

A site visit was undertaken on May 25, 2021 by Elizabeth Bonshek (Senior Heritage Consultant) and Brye Marshall (Heritage Consultant) prior to the production of this Non-Aboriginal (Historic) Archaeological Assessment.

<sup>&</sup>lt;sup>11</sup> Bickford & Sullivan 1984: 23-24)

Figure 8: Macquarie Data Centre

Figure 9: South west corner of the study area



Figure 10: western edge of study area



### 4.3 Previous Archaeological Studies

Many previous archaeological studies have been undertaken around Macquarie Park, including but not limited to:

# 4.3.1 Statement of Heritage Impact Proposed Development at 307 Lane Cove Road Macquarie Park, Heritage 21 report to Thunderbirds Are-a-Go Pty Ltd, 2021.

307 Lane Cove Road, Macquarie Park is less than 1km away from the 17-23 Talavera Road study area. The Heritage 21 SoHI ascertained that no heritage items were within the 307 Lane Cove Road study area nor within its vicinity.

# 4.3.2 Delhi Road Upgrade, North Ryde – Statement of Heritage Impact, Artefact report to Urban Growth NSW, August 2017

The Delhi Road Upgrade study area lies approximately 2km away from the Talavera Road study area. The Delhi Road Upgrade SoHI identified that moderate to major impacts to potential late

nineteenth century and early twentieth century archaeological resources such as farm buildings and associated outbuildings and archaeological deposits.

#### 4.4 Land use summary

European occupation of the study area has been divided into three general phases of historical activity, which are summarised below:

- Phase 1: Early European Settlement (1788 1870)
- Phase 2: Further land allocation (1870-1900)
- Phase 3: Twentieth century and on (1900 Present)

### 4.5 Assessment of archaeological potential

#### 4.5.1 Phase 1: Early European Settlement (1788 – 1870)

Archaeological remains relating to this early phase of settlement would be minimal due to the area being a common land. Any archaeological remains would be ephemeral resources such as tree boles, informal field drains and isolated artefact deposits. It is likely that no construction activities were being undertaken within the area at the time. Subsequent development in the study area would have impacted any of these physical remains.

The archaeological potential for recovering remains related to this historical phase is considered **low** to nil.

#### 4.5.2 Phase 2: Further land allocation (1870 – 1900)

Few details regarding the use and occupation of the majority of the land in the ensuing years could be found, however the listed occupations of the landowners suggest that it was mainly used for orchards and poultry farming. It is difficult to ascertain whether major structures were present in the study area at this time. In this case, it can be assumed that houses, outbuildings, and infrastructure associated with agricultural pursuits may have been within the study area at this time. However, small farms like these are usually under-represented in the historical record and little documentation is available to provide further details. Furthermore, later construction activities within the study area are likely to have impacted any archaeological remains.

The archaeological potential for recovering remains related to this historical phase is considered **low**.

#### 4.5.3 Phase 3: Twentieth century and on (1900-present)

Built structures associated with market gardens, poultry farms and orchards constructed or modified within the study area during this phase would not be considered archaeological in nature. The construction of the current Data Centre on the north eastern part of the study area would have impacted any remains of the structure shown on the 1943 aerial imagery. Earthwork remains of the reservoir shown on the aerial imagery may be encountered on the north western edge of the study area.

The potential to encounter archaeological remains related to this phase is considered low.



# 4.6 Assessment of archaeological significance

#### 4.6.1 Introduction

This section assesses the heritage significance of the known or potential archaeological remains outlined in Section 4.5. As with other types of heritage items, archaeological remains should be managed in accordance with their significance. Assessing the heritage value of archaeological remains is complicated by the fact that their extent and nature is often unknown. Judgement must therefore be based on expected or potential attributes.

The *NSW Heritage Manual* provides the framework for the following significance assessment of the study area. These guidelines incorporate the aspects of cultural heritage value identified in the *Burra Charter* (Australia ICOMOS 2013). The Heritage Branch (now Heritage Division) has also issued the 2009 *Assessing Significance for Historical Archaeological Sites and 'Relics'*<sup>12</sup> and the 1996 *Archaeological Assessment Guidelines*.<sup>13</sup> The assessment of historical archaeological sites requires a specialised framework in order to consider the range of values of an archaeological site.

Archaeological significance assessments have only been prepared for those historical phases which potential archaeological remains have been identified.

### 4.7 Summary of areas of archaeological potential and significance

#### 4.7.1 Phase 2: Field of Mars common land sales (1870-1900)

There are no significant potential archaeological resources in the study although there is the unlikely but possible potential for artefactual deposits relating to Phase 2.

#### Table 2: Summary of significant potential archaeological deposits at 17-23 Talavera Road

Phase	Potential archaeological remains	Potential	Significance
Phase 2 (1870-1900)	Artefactual deposits (glass, ceramic, bone, timber, plant remains) related to privies, cisterns or wells associated with the pre 1900 market garden, poultry farm and orchard occupation of the study area	Nil to Low	Local

<sup>&</sup>lt;sup>12</sup> NSW Heritage Branch 2009

<sup>&</sup>lt;sup>13</sup> NSW Heritage Office 1996: 25 - 27

# 5.0 CONCLUSIONS AND RECOMMENDATIONS

### 5.1 Conclusions

This report concludes that:

- There are no listed heritage items within the study area.
- There is low potential that significant archaeological remains are present within the study area.

### 5.2 Recommendations

During construction works, it is recommended that:

- An Unexpected Finds Policy is developed in the unlikely event that relics are identified during ground disturbing works.
- All relevant staff, contractors and subcontractors should be made aware of their statutory obligations for heritage under the NSW *Heritage Act 1977* and best practice as outlined in The Burra Charter 2013. This may be implemented as a heritage induction.



# 6.0 REFERENCES

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#### Artefact Heritage ABN 73 144 973 526 Level 4, Building B 35 Saunders Street Pyrmont NSW 2009 Australia +61 2 9518 8411

+61 2 9518 8411 office@artefact.net.au www.artefact.net.au