

Historical Archaeological Heritage Impact Assessment Amendment Report

2A Gregory Place, Harris Park, NSW



Build to Rent Affordable Housing State Significant Development (SSD-31179510)

Report to
2A Gregory Place Pty Ltd

dominic steele consulting archaeology
December 2025

Acknowledgement

We acknowledge the traditional custodians of the Country on which this project is located and we pay our respects to all elders past and present.

Document control

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Report summary

This Historical Archaeological Impact Assessment Amendment Report has been prepared to inform the proposed development of the 2A Gregory Place site in Harris Park as a build to rent and affordable housing State Significant Development. This report addresses the Planning Secretary Environmental Assessment Requirements (SSD-31179510) that have been issued for the proposal and has been updated in response to changes that have been made to the scheme and comments that have been raised through public comments and the state design review panel and as a result of stakeholder engagement.

Our understanding of Country

Harris Park is located on the backplain and southern edge of the Parramatta River floodplain and was likely a well-watered and lightly wooded grassland landscape in 1788. We use historical records and landscape analysis and mapping to reconstruct the place in 1788 as likely featuring chain of ponds drainage and swampy meadows formation vegetation.

Colonial land use and Neale's Cottage 1854

We have reviewed the early agricultural history of the site and context relative to Hambledon cottage that was built in about 1824 for the Macarthur's children's nanny (Penelope Lucas). The first building on the land was in 1854 and relates to a small brick and timber cottage built by Edward Macarthur between Hambledon Cottage and Clay Cliff Creek for a long-term employee (George Neale).

Deterioration of the Clay Cliff Creek watercourse

Historical records for the land and how it was used in the second half of the nineteenth century are sparse, but the watercourse appears to have continued to retain recognisable ponding form in parts of former Harris Estate until 1850s. Urbanisation of the local landscape from late 1870s led to deterioration of the Clay Cliff Creek environment and subsequent public complaints about flooding and unsanitary conditions. By the early 1890s construction works had begun to manage the land and confine the watercourse into a stormwater drain.

Demolition of Neale's Cottage

It is not known precisely when the cottage was demolished or the circumstances. The section of the Clay Cliff Creek concrete channel drain that crosses the site was built c.1917 and this construction may have triggered/necessitated the demolition of the old farm house.

Archaeological impact of the 1950s factory construction

Bulk excavation and progressive building constructions for the factory from the 1950s have resulted in the lowering of the 1950s ground levels by about 1.5m across the site with deeper excavations below some of the the larger buildings and the construction of the stormwater channel (6m wide and 3m deep) has also had a deep impact.

Geotechnical information

Geotechnical data for the site shows that original ground surfaces below the factory have been lowered by construction by about 1.5m and below the factory floor surfaces are thick deposits of uncontrolled fill (1.5m) that are underlain by two units of floodplain deposit that comprise soft to firm silty clay alluvium (5.9m thick) over bedrock.

Predicted archaeological survival at the site

Potential historical archaeological profiles beneath the factory have been cut down to a depth that is likely to have largely truncated and removed colonial-period ground surface and subsurface soil levels. Archaeological evidence types of mid-century brick dwellings that may survive include building footings (stone/brick), internal subfloor occupation deposits, a well/privy, garden rubbish pits, post holes from fence lines, drainage control features. However, neither substantial nor intact archaeology related to the cottage is expected to survive below the depth of excavation for the factory and the adjacent stormwater drain footprints.

Significance

The land was likely used for agriculture/grazing during the early colonial period and was not built on until 1850s. Potential archaeology that may have survived construction of the stormwater channel (1917) will have been further impacted and/or removed by the building of the factory (1950s).

Excavation for modern building has likely removed or extensively disturbed potential historical archaeological features and deposits. Intact or extensive archaeology is not expected to survive. It is predicted that the potential archaeological resources will be limited in nature and extent and integrity, have limited research potential, and will be of local significance.

Archaeological constraints

The predicted former location of the cottage is the only specific location on the site where potential historical archaeological features and deposits are suspected to occur. Test excavation to establish if relics are present at the location is not currently practicable because there is potential for fills and natural sediments below the factory to be contaminated. Testing requires approval to demolish buildings and remove large amounts of fills to reach depths required (at least 1.5m) to enable testing.

Proposed management of the potential historical archaeology at the site

We propose that the identification of the presence of relics on the site can be effectively achieved through archaeological monitoring and recording of earthworks following building demolition. Controlled salvage excavation of any relics identified would be undertaken before development. The proposed steps in management for the site are to evaluate the findings of contamination assessments and building demolition planning when this information is available and the development of an archaeological monitoring approach and research design and salvage excavation methodology for the site that is based on results of environmental assessment and demolition planning.

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1.0 Introduction

1.1 Background

This Historical Archaeological Heritage Impact Assessment Amendment Report has been prepared to inform the proposed development of the 2A Gregory Place site in Harris Park as a build to rent and affordable housing State Significant Development. This report has been developed to address the Planning Secretary Environmental Assessment Requirements (SSD-31179510) that have been issued for the proposal and has been updated in response to changes to the scheme and comments that have been raised through public comments and the state design review panel and as a result of stakeholder engagement.

Figure 1.1: The 2A Gregory Place land (Lot 2 in DP 807801) is about 19,480 sqm in size and is occupied by a former light industrial buildings that range from two to eight storeys (equivalent) in height



The 2A Gregory Place site is located within one of the City of Parramatta's significant non-Aboriginal heritage landscapes and is situated close to several heritage items that are listed on the State Heritage Register (SHR). The closest of these SHR items is Hambledon cottage which is located to the immediate north.

This report identifies whether the proposed development of the 2A Gregory Place land has potential to impact on relics as they defined by the Heritage Act 1977 (as amended) and recommends how potential future impacts should be managed.

1.2 Development concept

The proposal is illustrated by the basement, elevation, and cross section drawings below.

The site plan for Gregory Place above shows a building layout with various rooms and outdoor spaces. The building is situated along a road on the left side of the plan. The layout includes a central corridor, several rooms, and a large outdoor area at the rear. The plan is color-coded to show different types of spaces: yellow for the back of the house, light yellow for residential storage, and grey for plant areas. The plan also shows a landscaped shared zone above the building and a parking area to the right. The plan is titled 'GREGORY PLACE ABOVE' and includes a legend and a north arrow.

Legend

- Back of House
- Residential Storage
- Plant

Site Plan Details:

- Building Layout:** The building is a long, narrow structure with a central corridor. Rooms include a kitchen, living area, dining area, and bedrooms. There are also several storage areas and a large outdoor area at the rear.
- Landscaped Shared Zone Above:** A large area of landscaping is located above the building, featuring a central water feature and several trees.
- Parking Area:** A parking area is located to the right of the building, with several spaces for cars and a designated area for bicycles.
- Other Features:** The plan includes a north arrow, a scale bar, and a title block with the project name and date.

The image contains two architectural section drawings of the Hambleton Cottage development.

Figure.111 East/West Section: This drawing shows a cross-section of the development from east to west. It includes buildings labeled GREGORY PL, BUILDING A1, HAMBLETON COTTAGE, BUILDING B1, and BUILDING C. A prominent red structure, likely a windmill or tower, is visible behind BUILDING A1. The drawing shows multiple levels of the buildings and surrounding landscape elements like trees and a road.

Figure.112 North/South Section: This drawing shows a cross-section of the development from north to south. It includes buildings labeled BUILDING A2, BUILDING A1, and HAMBLETON COTTAGE. The drawing shows the vertical profile of the buildings, including a red structure behind BUILDING A1. It also depicts the surrounding landscape, including trees and a road.

Figure 1.4: Elevations (Tzannes 2025)

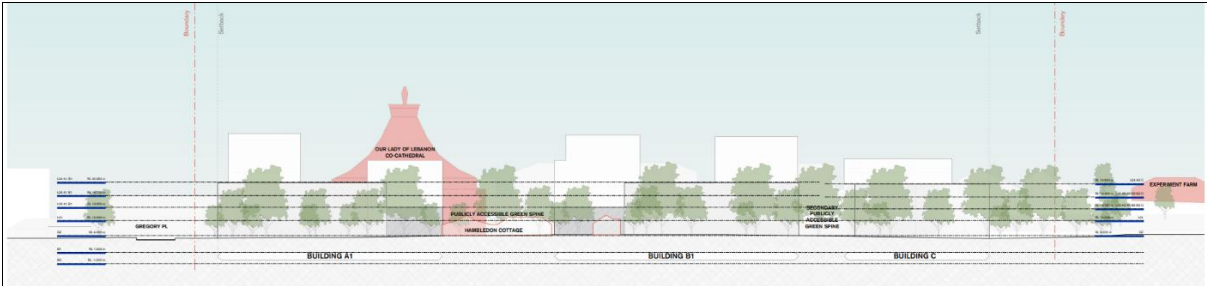


Figure.113 North Elevation - Landscaped Shared Zone

Figure.114 South Elevation - Channel Walk

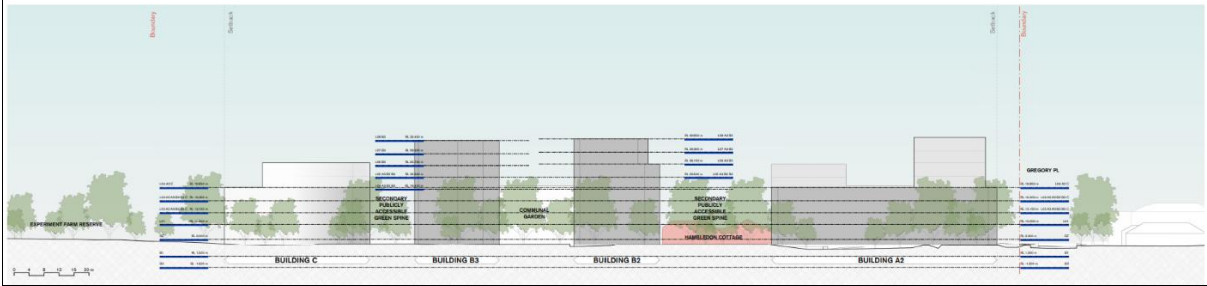


Figure 1.5: Elevations (Tzannes 2025)

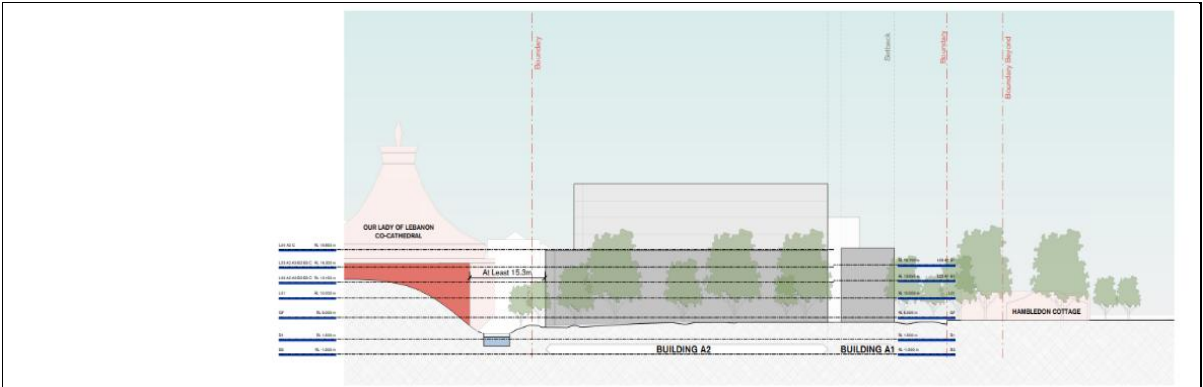
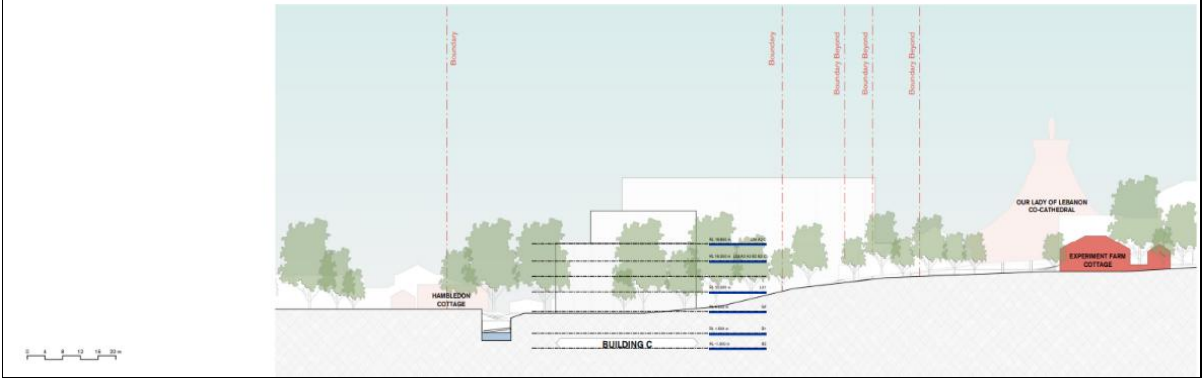


Figure.115 East Elevation - Gregory Place

Figure.116 West Elevation - Experiment Farm



1.3 Statutory heritage context

1.3.1 2A Gregory Place archaeological heritage status

The 2A Gregory site is not listed as an item of heritage significance in any statutory instrument. The heritage provisions in Clause 5.10 of Parramatta Local Environmental Plan 2011 (PLEP 2011) provide standard statutory protection for both individual items and conservation areas in Parramatta.

The *Parramatta Historical Archaeological Landscape Management Study* (PHALMS) identifies the site as forming part of Parramatta Archaeological Management Unit (AMU) 2932.¹ Following sections of this report discuss the significance and archaeological research potential of this AMU and the potential for relics to occur on the site.

1.3.2 Hambledon cottage, grounds and archaeology

The SHR listing for Hambledon cottage and grounds identifies the potential historical archaeological resources to be of high archaeological research potential for their important and direct associations with an influential family in Australian history (Macarthur) and strong associations with other individuals and families important in the history of Parramatta.

Hambledon cottage was built by John Macarthur in 1824 as a second house on his Elizabeth Farm Estate and the site is significant as representing an important element of an estate (Elizabeth Farm) that became a prototype of Australian land management. The house is considered to be a fine and rare example of an 1820s domestic building and is expressive of the taste, aspirations and needs of its several owners. Its landscape elements include plantings dating from its earliest construction and are now some of the nation's oldest surviving European plantings. The SHR-listing describes archaeological significance:

The archaeology at Hambledon Cottage and grounds has a high archaeological research potential and is likely to be highly intact and of state significance. Hambledon Cottage also has significance for its role in illustrating the development of the status of Parramatta and holds great value for contemporary society for these reasons. The archaeological resource will be able to contribute to more accurately documenting the development, use and life style associated with the cottage, Parramatta and early colonial society (SHR Database Number 5052762).

¹ PHALMS covers archaeological resources in Sydney Regional Environmental Plan (REP) No. 28 Primary Centre that includes Harris Park and identifies (AMU's) that are areas of land with similar archaeological potential and similar archaeological management recommendations. The REP was gazetted in 1999 and included a schedule of heritage items and Parramatta City Centre LEP was gazetted in 2007 and included relevant heritage items from the REP.

Figure 1.6: Hambledon Cottage and buildings on the 2A Gregory Place site in the background. The construction of the factory buildings in the 1950s cut-down the original ground levels across the footprint of the 2A Gregory Place site to about 1.5m



1.3.3 NSW Heritage Act 1977 (as amended)

The *NSW Heritage Act 1977* (as amended) is the principal legislation that provides statutory protection for (primarily) non-Indigenous heritage and the requirements for its management in NSW. The purpose of the Act is to protect, conserve and manage the environmental heritage of the State broadly defined as *‘those places, buildings, works, relics, moveable objects, and precincts, of State or Local heritage significance’*. Historical-archaeological remains are additionally protected via the operation of the ‘relics’ provisions of the Act (Division 9, Part 6, Sections 138-146). Amendments to the Act in 2009 have changed the definition of an archaeological ‘relic’ whereby a relic is now referred as an archaeological deposit, artefact, object, or material evidence that:

- a) *Relates to the settlement of the area that comprises NSW, not being Aboriginal settlement; and*
- b) *Is of State or Local heritage significance.*

The Act requires anyone proposing to disturb land to obtain a permit from the *Heritage Council of NSW* (under s.140 or Section 60 of the Act) if it is known or suspected that ‘relics’ of significance may be disturbed, moved, or destroyed by future land alterations and/or use. Section 139 of the Act stipulates that:

- a) *‘A person must not disturb or excavate any land knowing or having reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged, or destroyed unless the disturbance or excavation is carried out in accordance with an excavation permit.’*
- b) *A person must not disturb or excavate any land on which the person has discovered or exposed a relic except in accordance with an excavation permit’.*

If the site is listed on the SHR, approval for an Excavation Permit is required under Section 60 of the Act. Exceptions under Section 139(4) of the Act include an archaeological assessment to be prepared and which

indicates any relics on the land are unlikely to have State or Local heritage significance (1A), the excavation or disturbance of land will have a minor impact on archaeological relics (1B), and where the proposed excavation demonstrates that evidence relating to the history of the site, such as its level of disturbance, indicates that the site has little or no archaeological research potential (1C).

1.4 Archaeological assessment methodology

This assessment has followed precautionary due diligence approaches to the assessment of impacts to ‘relics and archaeological deposits that are protected under the terms and definitions of the *Heritage Act 1977* (as amended) and has been prepared with reference to the following heritage assessment and reporting standards and guidelines:

- Australia ICOMOS. [2013]. The Burra Charter. The Australia ICOMOS Charter for Places of Cultural Significance. Australia ICOMOS Inc.
- NSW Heritage Office. 1996. NSW Heritage Manual. NSW Heritage Office and the Department of Urban Affairs and Planning. Sydney (revised 2002 – SoHI).
- NSW Heritage Office. 2006. Historical Archaeology Code of Practice. NSW Heritage Office.
- NSW Heritage Office. 2008. Levels of Heritage Significance. NSW Heritage Office, Sydney.
- NSW Heritage Branch. 2009. Assessing Significance for Historical Archaeological Sites and ‘Relics’. NSW Heritage Branch, NSW Department of Planning.

1.5 Authorship

Dominic Steele has written this report. The landscape and soil maps have been prepared by Eric Claxton.

2.0 Heritage landscape context

2.1 Reconstructing the Clay Cliff Creek landscape

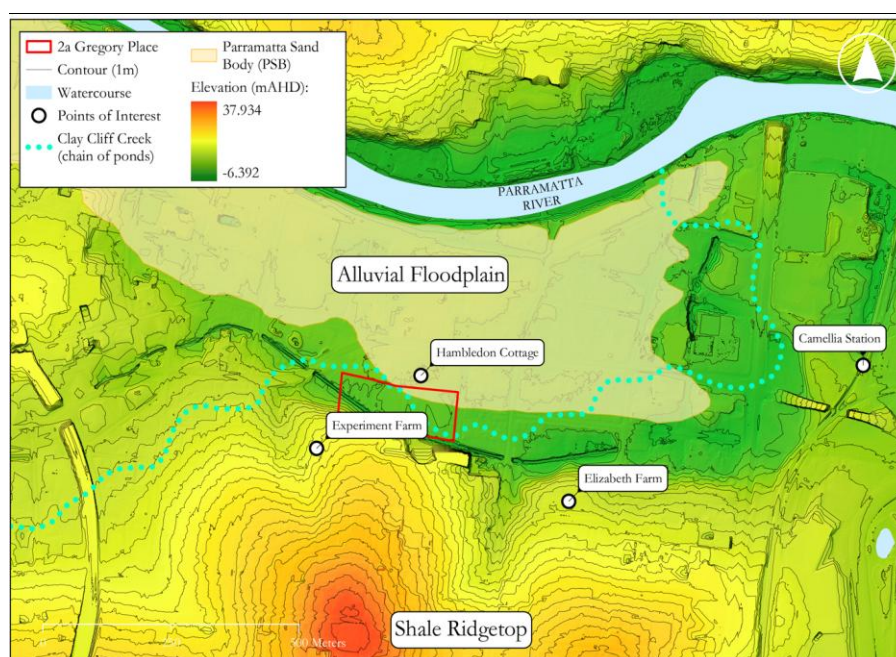
2.1.1 Preamble

Following sections aim to show Clay Cliff Creek in 1788 was not a free flowing creek in a traditional European understanding of watercourses that can be ranked according stream order and tributary hierarchy but rather comprised chain of ponds drainage that likely featured wetlands and swampy meadows formations. The watercourse was extensively degraded by colonial land clearing and stock grazing in the first half of the nineteenth century before this drainage form was progressively confined into a concrete stormwater channel from the 1890s.

2.1.2 What type of watercourse is Clay Cliff Creek?

Clay Cliff Creek is a fresh watercourse that originates in Merrylands and travelling from the west drains elevated shale landforms before crossing to the east across the lower alluvial floodplain of the Parramatta River to empty. We reconstruct the original form of Clay Cliff Creek in 1788 (in the stretch broadly extending from the west of Elizabeth Farm to around Harris Street) was likely to have been discontinuous chains of ponds in low lying terrain along drainage flow alignments rather than the watercourse occurring as a linear and incised creek form with banks and bed and free flowing water.

Figure 2.1: Familiar historic heritage items and recorded historic Aboriginal site location within a reconstructed landscape at Harris Park comprising chain of ponds and swampy meadows. Colonial agricultural activities at Harris Park in the form of vegetation clearing and grazing led to the loss of wetlands and entrenchment of drainage flows into continuous channels

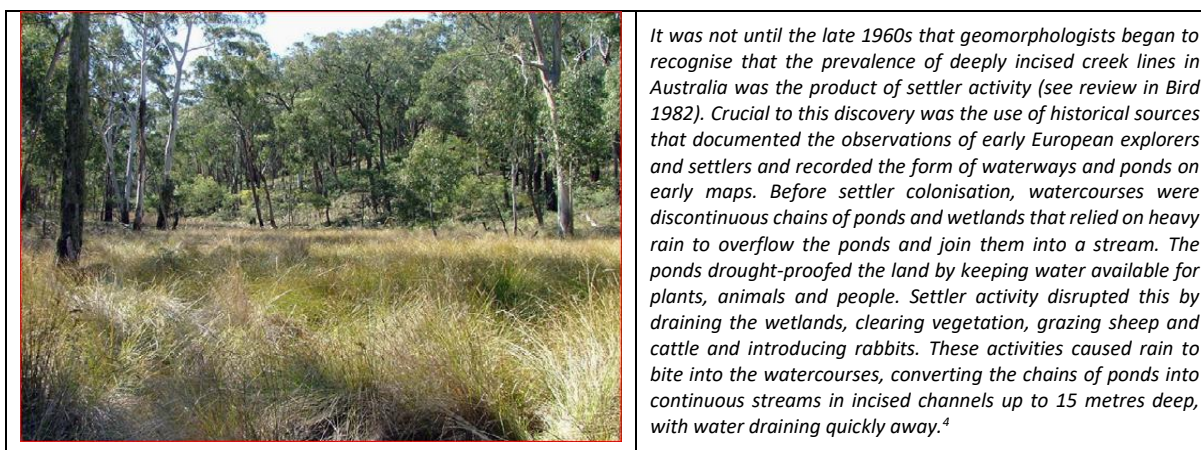


2.1.3 Chain of Ponds drainage

The landscape at Harris Park are likely before colonisation to have had drainage patterns in the form of irregularly spaced and ponds separated by preferential flow paths and generally only saw continuously running water during high rainfall events. These landforms are known as swampy meadows formations and represent in-channel forms vegetated with grasses and interspersed with irregularly spaced disconnected ponds.² Land clearance and grazing led to the loss of swamps and wetlands, native grasses and trees, and entrenchment of drainage flows into continuous channels.

The former presence of this drainage form across the Cumberland Plain to the west of Parramatta is reflected in the names of a number of western Sydney watercourses such as First Ponds Creek, Second Ponds Creek, Gidley Chain of Ponds, and Killarney Chain of Ponds.

Figure 2.2: An example of a swampy meadow (Cookanulla Creek) with disconnected pools, or a chain of ponds³



2.1.4 Ponds and waterholes on Clay Cliff Creek

It is likely that the landscape between Clay Cliff Creek and the Parramatta River had uneven and low-lying surface topography that featured chain of ponds drainage and swampy meadows formation vegetation and ecologies. Walter Campbell recalled in the 1850s the land at 'Harris' paddock' (around Experiment Farm) was largely cleared of timber but on the '*summit of the hill*' there was an open forest of mahogany trees '*which probably were in much the same condition as they were when Parramatta was first discovered*'. Campbell also described that meandering through the paddock was Clay Cliff Creek that was '*generally a series of waterholes*'.⁵

² Eyles 1977, Mactaggart et al 2007:Figure 2.19.

³ Mactaggart et al 2007.

⁴ Lawrence and Davies 2018:240-241.

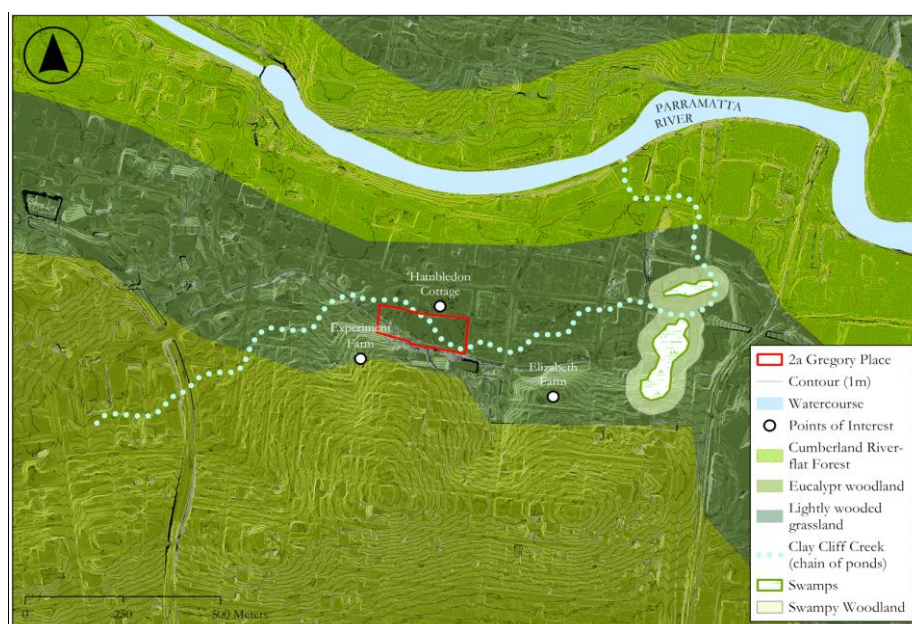
⁵ Cumberland Argus, 8 December 1920:4.

Insights into the survival of indigenous vegetation in this established agricultural landscape are provided by a first-hand overview of the flora of the district in 1857.⁶ Black-butt and Bloodwood and Turpentine trees were abundant near creeks north of Parramatta and Woolly-butt tree (*E. gomphocephala*) grew abundantly on the south side of Parramatta. In one part of ‘General Macarthur’s bush’ the latter tree type was found to be more plentiful than any other species. In the lower parts of the estate, towards Duck River, ‘water gum’ (*Tristania nereifolia*) grew in abundance. Near Red Bank there were some small turpentines, but the locality did not seem favourable for them (but purple coloured *Mirbelia* grew plentifully). Also noted was one grass (*Anisopogon avenaceus*) that grew at North Rocks but was not common elsewhere and owing to the introduction of foreign grasses was rapidly disappearing.⁷

2.6.5 Clay Cliff Creek as part of a managed Aboriginal landscape

The appearance of this Country was consistently described by the first British people to see it as resembling a (vast) ‘park’. The open and lightly wooded grassland is believed to have been cared for, shaped and maintained by Aboriginal people over an extended period of time using fire management. Aboriginal people are likely to have burnt the open grassy understorey frequently with low intensity fires to keep it clear and stimulate new growth and create conditions favourable for grazing animals. Fires would be managed by geographical features such as watercourses and previously burnt and pathways resulting in a mosaic of resource locales.

Figure 2.3: Reconstructed landscape features at Harris Park with chain of ponds drainage - rather than an incised and linear creek form – being a central river landscape element of the Parramatta River floodplain in this location



⁶ Sydney Morning Herald 1857, 24 December 1857:8.

⁷ Sydney Morning Herald 1857, 24 December 1857:8.

3.0 Historical context

3.1 British discovery of Aboriginal Parramatta

Port Jackson was explored and charted by the British soon after landing at Sydney Cove. Captain Hunter and Lieutenant Bradley (HMS Sirius) examined the eastern end of the harbour first (28-29 January) followed (3 February) by the coves and inlets to the northwest (Lane Cove). The following day was the first of three explorations made by the British to establish the westward termination of the harbour and find agricultural land. The landscape in the vicinity of the 'head of the harbour' was first seen by the British on 4-5 February by an exploration party led by Hunter. They were in a six oared boat (along with another small boat) when they reached the tidal flats near to the entrance to today's Homebush Bay. Bradley described:⁸

At noon we were far enough to see the termination of the Harbour as far as Navigable for ships, being all Flats above us with narrow passages that we supposed might run a considerable distance but very shoal. The harbour is navigable for ships twelve miles east and west and the branches extend six miles north and south. It is one continuation of harbour formed by snug coves with good depth of water and fresh water in many of these.

Bradley also noted⁹ *'there being assembled up here an astonishing number of Natives all Arm'd, Flats on which the boats might ground in this channel and put us much in their Power'*. Hunter described:

We were a little surprised to find the natives here in greater numbers than we had ever seen them before in any other place.....they appeared very hostile, a great many armed men appeared upon the shore wherever we approached it, and, in a threatening manner, seemed to insist upon our not presuming to land. During the whole time we were near them, they hailed each other through the woods, until their numbers were so much increased, that I did not judge it prudent to attempt making any acquaintance with them.

The second exploration (15 February) was in three boats that reached the 'Flats' (Rhodes Point) and the party landed and explored the Concord area for 2-3 miles into Country where trees were spaced *'a considerable distance apart & the soil in general good. Grass very long & no underwood'*. Their likely route probably took them midway between Haslam's Creek and the Parramatta River and possibly ended in the vicinity of Olympic Park. The next entry in Bradley's journal states:¹⁰

At 1pm, returned to Boats & after Dinner went in the smallest boat over the Flats and past a Mangrove Island [Mud island] & followed a Creek [Parramatta River] some distance to the W. ward when it branched away to the NW [Parramatta River] and SW [Duck River] which last we followed 4 Miles as near as we could judge, the lake or drain is very shoal and where we stop'd was entirely filled up with fallen trees from both sides, the water filling fast we had barely time to get down Boats, which we then join'd returned to the Ship.

⁸ Bradley 1969:76.

⁹ Ibid:76-77.

¹⁰ Ibid: 82-84.

The third exploration party (April 22-27) was to pass through the future site of Rose Hill and to proceed west through Seven Hills and Blacktown to reach two hills with views over the Eastern Creek Valley below and towards the Blue Mountains in the distance. The first hill is believed to be today's Bungaribee Hill and the second hill is believed to have been Rooty Hill. During the trip they came across a few '*mean*' Aboriginal huts that were located next to water holes and lagoons on the western outskirts of the future Rosehill township, and they saw fleeting glimpses of Aboriginal social activity in progress at Eastern Creek, but they made no direct contact with local Aboriginal groups in Parramatta or on the way west or on their return. The *Historical Records of NSW* version of Phillip's account of this expedition is:¹¹

I set off the 22nd of April, with six days provisions. We were eleven officers and men, and landed near the head of the harbour... We proceeded westward, finding the country in general as fine as any we ever saw, the trees growing from twenty to forty feet from each other... The country through which we past was mostly level, or only rising in small hills, which gave it a pleasing and picturesque appearance. The fifth day we got to a rising ground... The country round this hill was so beautiful that I called the hill BelleVeue...

John White's journal gives an eye-witness account and provides details of repeated evidence the explorers saw of Aboriginal people's presence and activity on the Country. White describes on 22 April:¹²

The governor, accompanied by the same party, with the addition of Lieutenant Cresswell of the marines and six privates, landed at the head of the harbour [The landing site was at the confluence of the Parramatta and Duck Rivers], with an intention of penetrating into the country westward, as far as seven days provisions would admit of; every individual carrying his own allowance of bread, beef, rum, and water. The soldiers, beside their own provisions, carried a camp kettle and two tents, with their poles, &c. Thus equipped....we proceeded on our destination. We likewise took with us a small hand hatchet in order to mark the trees as we went on, those marks (called in America blazing) being the only guide to direct us in our return. The country was so rugged as to render it almost impossible to explore our way by the assistance of the compass.

In this manner we proceeded for a mile or two, through a part well covered with enormous trees, free from underwood. We then reached a thicket of brushwood, which we found so impervious as to oblige us to return nearly to the place from whence we had set out in the morning. Here we encamped, near some stagnant water, for the night, during which it thundered, lightened, and rained.

White describes on 23 April they got around a wood or thicket which had '*harassed*' them the day before and soon fell in with a '*hitherto unperceived branch of Port Jackson harbour*' [Parramatta River] where the banks were grassed with chest high grass interspersed with a plant that closely resembled indigo.

¹¹ Historical Records of NSW. Volume 1:134-134.

¹² White 1788:131ff.

By skirting to the north of the thicket, the party emerged on the Parramatta River bank around two miles from their previous camp site that would be at a point just west of today's Thackeray Street.¹³ The party then followed the Parramatta River west for a few miles, where the same tall grassland again prevailed, until they came to a fresh-water stream that emptied into the river. The party camped here overnight (and ate soup made from a white cockatoo and two crows White had shot on the way). This overnight campsite was on Clay Cliff Creek and was probably in the vicinity of today's River Road West to the west of James Ruse Drive.

On the 24 April the group walked along the southern bank of the Parramatta River where there were immense trees spaced at a considerable distance from each other, and where the land was flat and rather low but well covered with long grass and shrubs as previously seen. This was in the vicinity of today's Queens Wharf and west towards probably the vicinity of the foot of today's Smith Street where White records here the tide stopped flowing at a flat space of large broad stones over which a fresh-water stream ran.

The next day (after having sowed some seeds) the party proceeded west for three or four miles '*where we met with a mean hut belonging to some of the natives but could not perceive the smallest trace of their having been there lately. Close to this hut we saw a kangaroo, which had come to drink at an adjacent pool of stagnated water, but we could not get within shot of it. A little farther on we fell in with three huts, as deserted as the former, and a swamp, not unlike the American rice grounds*'. The party continued for about two more miles and then camped overnight:

The country about this spot was much clearer of underwood than that which we had passed during the day. The trees around us were immensely large, and the tops of them filled with loraquets and paroquets of exquisite beauty, which chattered to such a degree that we could scarcely hear each other speak. We fired several times at them, but the trees were so very high that we killed but few.

The exploration party likely walked from their overnight camp upstream and turned west along Toongabbie Creek and followed Blacktown Creek west to where it branches and (possibly the site of the 'swamp' and Aboriginal huts) and then proceeded by compass over undulating higher ground roughly along the line of present-day Bungaribee Road. White describes the subsequent journey west to Eastern Creek.

26th April. We still directed our course westward, passed another tree on fire, and others which were hollow and perforated by a small hole at the bottom, in which the natives seemed to have snared some animal. It was certainly done by the natives, as the trees where these holes or perforations were, had many knots cut for the purpose of getting to the top of them.

¹³ McClymont 2004:43.

After this we crossed a watercourse, which shews that at some seasons the rain is very heavy here, notwithstanding that there was, at present, but little water in it. Beyond the chasm we came to a pleasant hill, the top of which was tolerably clear of trees and perfectly free from underwood. His Excellency gave it the name of Belle Veue.

From the top of this hill, we saw a chain of hills or mountains, which appeared to be thirty or forty miles distant, running in a north and south direction. The northernmost being conspicuously higher than any of the rest, the governor called it Richmond Hill; the next, or those in the centre, Lansdown Hills; and those to the southward, which are by much the lowest, Carmarthen Hills. In a valley below Belle Veue, we saw a fire, and by it found some chewed root of a saline taste, which shewed that the natives had recently been there. The country hereabout was pleasant to the eye, well wooded, and covered with long sour grass, growing in tufts. At the bottom of this valley, or flat, we crossed another watercourse and ascended a hill, where the wood was so very thick as to obstruct our view. Here, finding our provisions to run short, our return was concluded on, though with great reluctance, as it was our wish, and had been our determination, to reach the hills before us if it had been possible.

In our way back, which we easily discovered by the marks made in the trees, we saw a hollow tree on fire, the smoke issuing out of the top part as through a chimney. On coming near, and minutely examining it, we found that it had been set on fire by the natives; for there was some dry grass lighted and put into the hole wherein we had supposed they used to snare or take the animal before alluded to. In the evening, where we pitched our tents we shot two crows and some loraquets, for supper. The night was fine and clear, during which we often heard, as before, a sound like the human voice, and, from its continuance on one spot, we concluded it to proceed from a bird perched on some of the trees near us.

27th April. We now found ourselves obliged to make a forced march back, as our provisions were quite exhausted, a circumstance rather alarming in case of losing our way, which, however, we met with no difficulty in discovering by the marked trees.

Lieutenant Newton Fowell (Sirius) records that on their return:¹⁴

He [Phillip] supposed he had been about 40 mile in Land & that it was all the Way like a Park with Trees about 20 yards Distance from each other – the Country in General quite a Plain – the Grass about 3 feet high & paths all the Way that Natives had made – at about the Distance of about 20 Miles from them when Furthest in Land they saw Mountains, the very tops of them can be seen in a clear day from the head of the harbour – Water in Land is in great Plenty – they saw Several Ponds – some of them 200 Yards wide.

Additional observations of Aboriginal Parramatta in early 1788 are recorded by Bradley who describes a further examination of the 'shale beds' at Rosehill (12 May 1788):

¹⁴ Quoted in Flynn 1995:21.

A party went up the harbour to the lake or creek running to the NW above the flats. We went about 3 Miles up, to a very fine run of water. The country on both sides pleasant and the ground apparently fit for opening, with far less trouble than any in the other parts of the harbour, and the soil good. A little above the part where the fresh water meets the tide is the place supposed would produce slate but had been found on examination not fit for working. Found a great number of cranes and other birds about and above the flats, all very shy.

George Worgan was a surgeon on the Sirius, and described on 14 May:

I have had a most delightful Excursion to Day with Captn Hunter and Lt. Bradley, We went in a Boat about 12 Miles up the Harbour. For 3 or 4 Miles the Harbour forms a narrow arm, which at high Water, has the appearance of a River, the sides of this Arm are formed by gentle Slopes, which are green to the Water's Edge. The Trees are small and grow almost in regular Rows, so that, together with the Evenness of the Land for a considerable Extent, it resembles a Beautiful Park. We landed quite up at the Head of this Branch where a fresh Water River runs into it, but which, at this time was dry in many places. We walked about two Miles up the Country in the Direction of this River; the Ground ran in easy ascents and Descents, the Soil was extremely rich and produced luxuriant Grass.

We now and then, in our Walk, met with Clusters of a very delicate looking Tree, the Trunks of some of Them were 12. 14. 20 Inches round, covered with a green Bark, the leaves of a peculiarly beautiful Verdure and growing like the Fern, but more delicate. Having extended our Excursion as far as we wished, we returned to the Place where we landed and after regaling Ourselves with a cold Kangaroo Pie and a Plum Pudding, a Bottle of Wine &c, all which Comforts we brought from the Ship with Us, We returned on Board.

Worgan provides further details on the park-like appearance of the Country:¹⁵

In our Excursions inland....we have met with great Extent of Park-like country and Trees of a moderate Size and at a moderate Distance from each other, the Soil, apparently, fitted to produce of any kind of Grain, and clothed with extraordinary luxuriant Grass. It is something singular, that all, of this kind of Trees, and many others, appear to have been partly burnt, the Bark of them being like Charcoal.

Watkin Tench adds details. He noted Phillip's exploration party did not encounter any '*rivulets*' (the term Tench also used to describe the Parramatta River at Rose Hill) but were reliant on water provided by '*standing pools*' which occurred in the valleys and were supposed to be formed by seasonal rainfall. This is likely describing chain-of-ponds drainage. Similar to observations made by others Tench also reported spaced trees with the intermediate space with thick rich grass that did not '*overspread the land in a continued sward*', but grew '*in small-detached tufts, growing every way about three inches apart, the intermediate space being bare*'. This grass grew in every place but the swamps (and (was '*found to agree better with horses and cows than sheep*').¹⁶

¹⁵ Quoted in Gammage 2011:44-45.

¹⁶ Tench 2005a.

3.2 British settlement at Rosehill

In November 1788 surveyors and marines had been to the Crescent in Parramatta Park to mark out the ground for a ‘redoubt’ and convicts were sent who ‘understood the business of cultivation’. It is likely James Ruse was amongst this party. By July 1789, a ‘small redoubt was thrown up, and a captain’s detachment posted in it, to protect the convicts who were employed to cultivate the ground’.¹⁷ Collins reported ‘some ground had been opened on the other side of the stream of water which ran into the creek.....in which the produce of the ground he (Henry Dodd) was then filling with wheat and barley was to be deposited’¹⁸.

During this period, areas were cleared and cultivated south to today’s Great Western Highway, past Northmead to the north, and to the east the Government Farm stretched as far as present-day Charles Street. The main street at Rose Hill (High Street, later George Street) was laid out on an east-west axis from Government House to the first wharf. This broadly followed a part of a track ‘blazed’ by Phillip’s’ earlier exploration party to assist following explorations journeying from Sydney Cove to find Rose Hill.

Tench (1979:246) described the alignment of the road from near the Landing Place to the Governor’s house was a mile long and in many places was ‘carried over gullies of considerable depth, which have been filled up with trunks of trees, covered with earth’ that describes the originally undulating nature of the terrain and location of drainage along this stretch of the river.

By September 1790 ‘twenty-seven huts were in great forwardness at the end of the month’ (ibid:113), and by November 1790 thirty-two houses were completed.¹⁹ By the end of 1791 one hundred houses were finished. The first wharf at the ‘Landing Place’ (approximately the site of Queens Wharf) was also completed (September 1790) and site for the storehouse and for the new barracks chosen (August 1790).

3.3 James Ruse and Experiment Farm

James Ruse had a hut built for him and to an acre and a half of ground cleared before he took occupancy of his land grant in November 1789. The Governor promised that if he made a success of his farm, it would be increased in size to thirty acres. A deed of grant issued in March 1791 called the grant ‘Experiment Farm’ and describes it was situated near the ‘barracks ponds’ (Jervis 1935) and is likely to refer to a chain of ponds or lagoons were once a dominant feature of the natural landscape in this part of the early town.

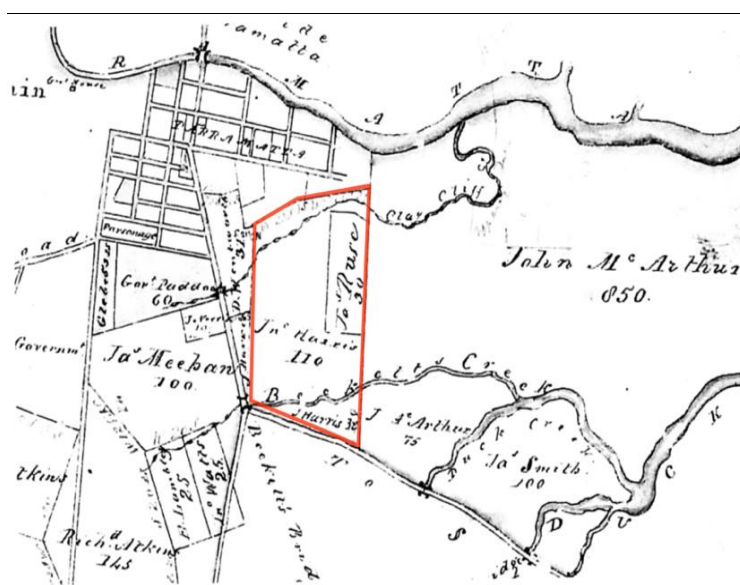
Tench visited his farm in 1790. Ruse advised he did not know the precise limits of his land but had cleared and burnt fallen timber and cultivated as much land as he could. The northern boundary of Experiment Farm was adjacent to Clay Cliff Creek.

¹⁷ Tench 1979:136.

¹⁸ Collins 1798:46.

¹⁹ Tench 1979:195.

Figure 3.1: Detail from the map of the parish St John dated around 1835. The extent of John Harris' land by grant and purchase is delineated (Source: Land & Property Information).



The existing Experiment Farm building is believed to have been built in the mid-1830s although a mid-1790s date has also been proposed. In the 1790s Harris' attention was focussed on Harris Farm (and on developing his grant at Ultimo from around 1804) and details of how the land was used is revealed in land and stock returns. In February 1794, 40 acres of the 110 acres were cropped with wheat, 70 acres were about to be planted with maize, there were 120 sheep and 300 goats, and the clays of Clay Cliff Creek were also extracted for brick making.

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3.6 Hambledon Cottage and ‘Neale’s Cottage’

Hambledon cottage was constructed in c.1824 for the Macarthur’s children’s nanny, Penelope Lucas, who lived there from 1827 until 1838 after which ownership transferred to Edward Macarthur. It was initially occupied in 1825 by Thomas Hobbs Scott (first Anglican Archdeacon of NSW). George Neale was a wheelwright who worked for the Macarthur family. In 1831 the Neale’s moved into a small timber cottage built between Hambledon Cottage and Clay Cliff Creek. In c.1854 a replacement brick cottage was built for the Neale family by Edward Macarthur within the immediate vicinity of the Gregory Place site.²¹

3.7 Nineteenth century developments

3.7.1 Experiment and Elizabeth Farm estates

During the 1850s Experiment Farm was changed by Thomas Harris who established a dairy farm and fenced the land into paddocks and Edward MacArthur built a brick cottage between Hambledon cottage and Clay Cliff Creek for a long-term employee, George Neale.

Figure 3.4: The caption to this image is ‘a single fronted cottage facing east, enclosed by a semi-circular picket fence, with stables and outbuildings to the south. The well-established garden and coach house of Hambledon is seen to the north across a three railed hardwood fence’ (Historic Houses Trust 2005)



3.7.2 ‘Neale’s cottage’

George Neale was a wheelwright who worked for the Macarthur family for most of his adult life. In 1831 he and Bridget Neale and their young daughter Elizabeth Mary moved into a small timber cottage that had been built between Hambledon Cottage and Clay Cliff Creek. In about 1854 a replacement brick cottage was built for the Neale family by Edward Macarthur within the immediate vicinity of the Gregory Place site.

²¹ Historic House Trust, ‘On the Hoof’, 2006).

Figure 3.5: Neale family and cottage, undated (GBA Heritage 2021: Figure 2.25)

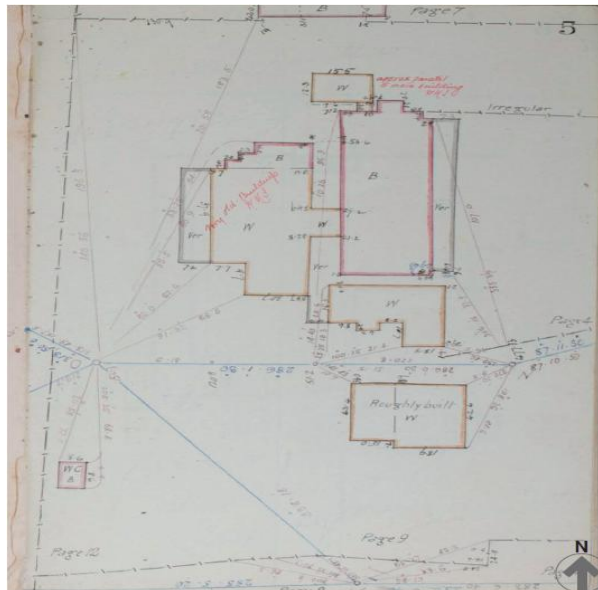


The 1895 survey of Parramatta shows the cottage faced east and the stables and outbuilding were to the south and west of the cottage. The Neale family stayed in the cottage until around 1882 when it is assumed it was demolished during construction works that changed the original Clay Cliff Creek drainage into a confined stormwater channel.

Figure 3.6: survey of Parramatta showing Neale's cottage with stable and outbuilding (blue) on the south side of Hambledon cottage (red) and coachman's cottage (green) on the southwest side of Hambledon Cottage (GBA Heritage 2021: Figure 2.22)



Figure 3.7: 1893 survey showing form of Neale's cottage and associated structures (GBA Heritage 2021: Figure 2.23)



3.8 Late nineteenth and early twentieth century changes

3.8.1 2A Gregory Place

The cottage and any associated structures were demolished sometime before 1943 when Goodyear Tyre and Rubber Co. purchased the land. It is believed that the section of the stormwater drain that crosses the 2A Gregory Place site was constructed in c.1917.

Figure 3.8: The site shown as vacant land crossed by the stormwater channel of Clay Cliff Creek in 1943 (Sullivan-ES 2015)



Figure 3.9: The study area in 1961 (Sullivan-ES 2015)



3.8.2 Clay Cliff Creek

With rapid urbanisation of the land from the late 1870s the sanitary condition of the watercourse deteriorated. By 1890, channelling the watercourse was necessary²² and a portion of the concrete channel between Church and Station Streets appears to have been completed in the early 1890s. The project was stopped (lack of funds) in 1895 and revived in the late 1890s with the completion of the channel to the west of Harris Street by 1900.²³ Harris Street was the terminus of the channel for several years and there was continued periodic flooding east of Harris Street.²⁴

3.8.3 Subdivision and construction of the existing factory

The original Statement of Heritage Impact prepared for the site (GBA Heritage 2021) details the early twentieth century land subdivision and purchases that led to the land consolidation and construction of the existing factory. The images below drawn from the SoHI show the nature of the ground surface and the coachman's cottage before the factory was built.

²² Cumberland Argus, 21/2/1891.

²³ Cumberland Argus, 21/11/1900; 17/4/1901.

²⁴ Cumberland Argus, 4/7/1914.

Figure 3.10: the site prior to the construction of the existing factory in 1945 (GBA Heritage 2021: Figure 2.84)



Figure 3.11: Looking west at the coachman's cottage located on the southwestern side of Hambleton cottage before the construction of the factory on the 2A Gregory Place site in 1945 (GBA Heritage 2021: Figure 2.85)



3.9 Archaeological implications

We predict that the original ground levels at the suspected location of 'Neale's' cottage that is shown below has been extensively impacted and truncated to a depth of at least 1.5m as a result of two distinct and separate phases of building works. The comprise the construction of the current concrete stormwater channel of Clay Cliff Creek in about 1917 (shown below to the left and in 1951) and by the 1950s factory. These ground impacts are likely to have significantly impacted any potential archaeological resources below the factory footprint.

Figure 3.12: Potential former location of ‘Neale’s cottage’ shown in 1951 and present day



4.0 Existing conditions

4.1 Buildings

The former 1950s factory site is located approximately 6.5m to 4.5m above sea-level (AHD)²⁵ and comprises a relatively flat concrete or asphalt sealed surface that is also largely covered by a number of main buildings and works areas illustrated below. The main buildings on the site comprise an office/warehouse/factory building that covers about two-thirds of the property, with an asphalt carpark covering the western area and concrete loading dock covering part of the southern area.

An open storm-water channel gently grades from the west from 2.67m to 2.13m RL (and is 6m wide and 3m deep from ground level) that contains the flow of Clay Cliff Creek runs the length of the southern site boundary then cuts through the site in the southwest corner. Clay Cliff Creek drains to the east and eventually empties into the Parramatta River adjacent to James Ruse Drive.

Figure 4.1: Indicative external building space along the southern side of the site (looking west) showing the boundary it shares with the grounds of Hambledon Cottage (left) and the extent to which the factory construction has lowered the ground here



²⁵ Sullivan Environmental Services 2021:13.

Figure 4.2: Indicative external space – southern side of building (looking east). Note to the right the difference in height between the existing (higher) ground on the adjacent Hambledon Cottage grounds and the bitumen surface



Figure 4.3: Building and car park surface at the eastern side of the site



Figure 4.4: Indicative internal spaces (warehouse) in the east and center of the site

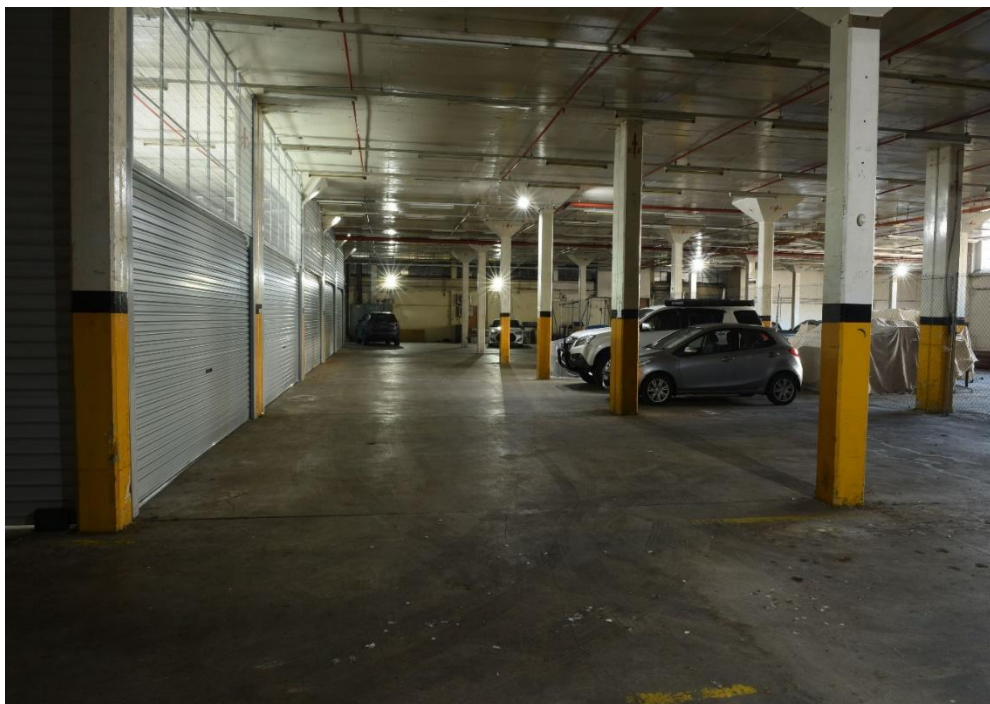


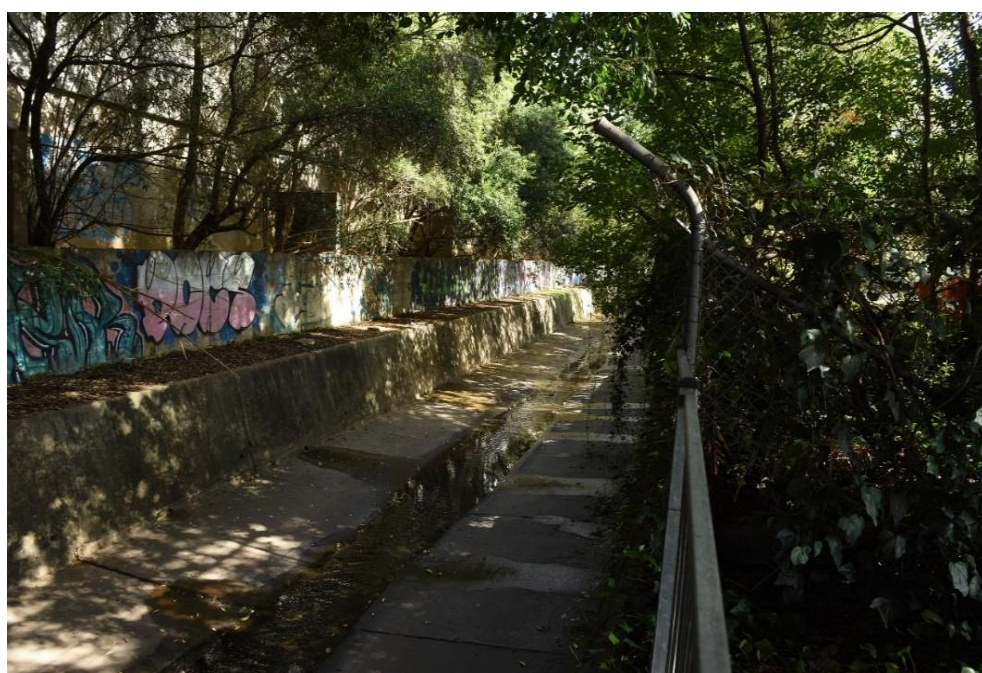
Figure 4.5: Indicative internal spaces (manufacturing and offices) in the western part of the site



Figure 4.6: Indicative internal space in the northwestern part of the site (looking east). The channel for Clay Cliff Creek is about 6m to the right (obscured by vegetation)



Figure 4.7: Indicative view of the canal for Clay Cliff Creek (looking east)



4.2 Contamination

An assessment of the presence of soil and groundwater contamination provides recommendations for additional investigations or remediation. Sampling points for this investigation are shown by the site plans drawn from this study reproduced below.²⁶

Figure 4.8: Sampling locations (Sullivan Environmental Services 2021)

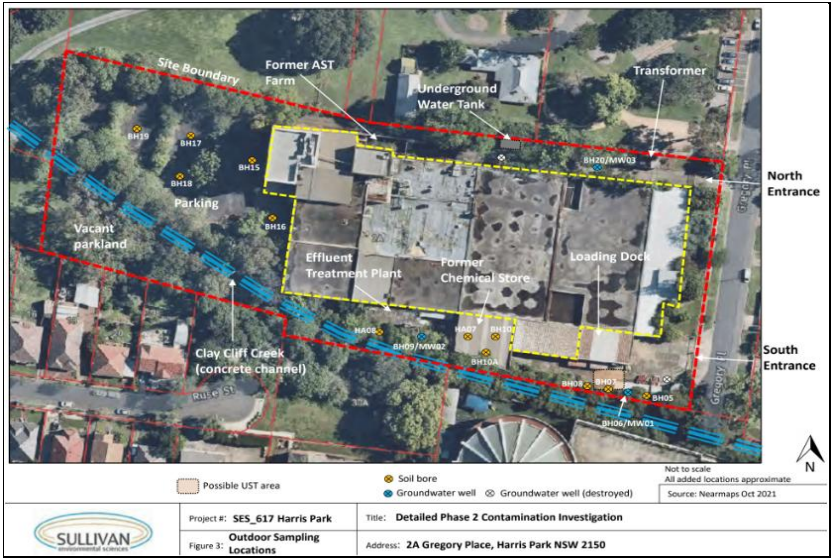
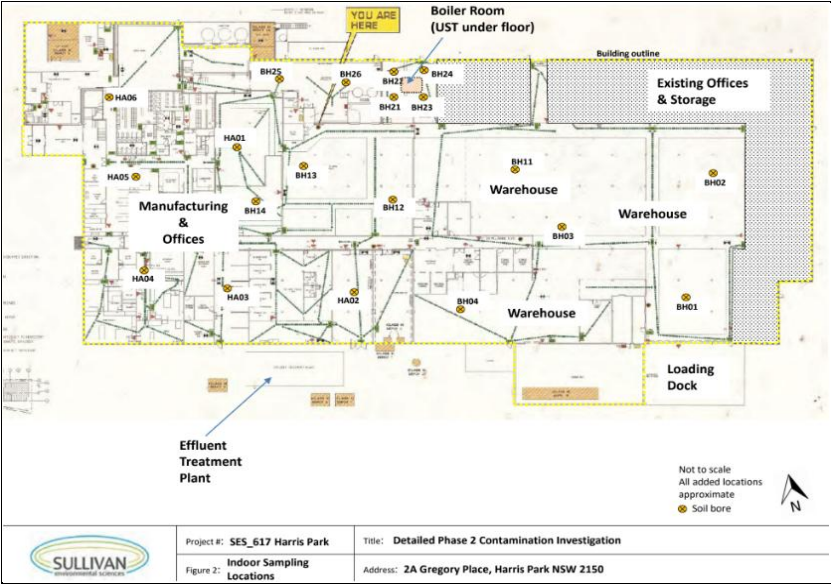


Figure 4.9: Indoor sampling locations



²⁶ Sullivan E-S March 2022.

Figure 4.10: Outdoor soil exceedances (Sullivan E-S 2021)

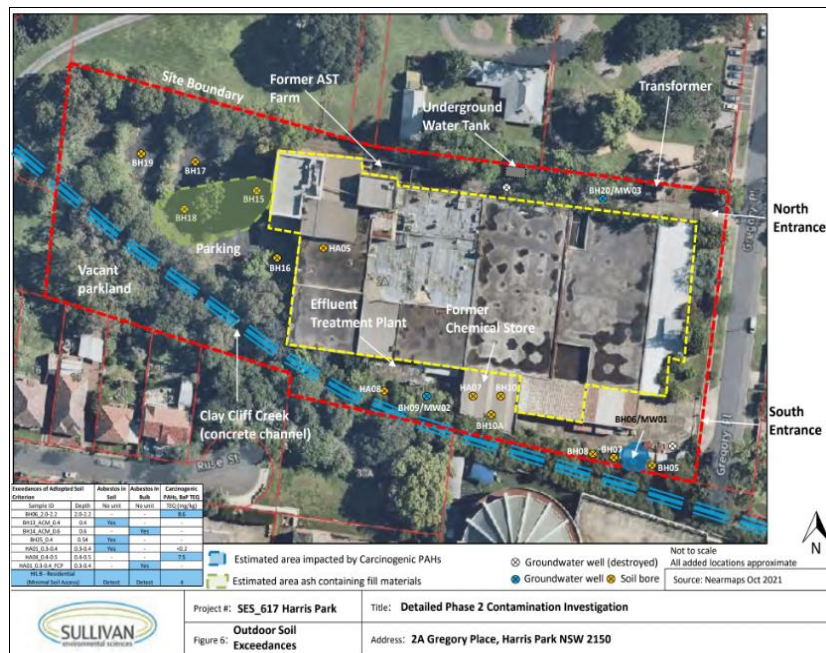
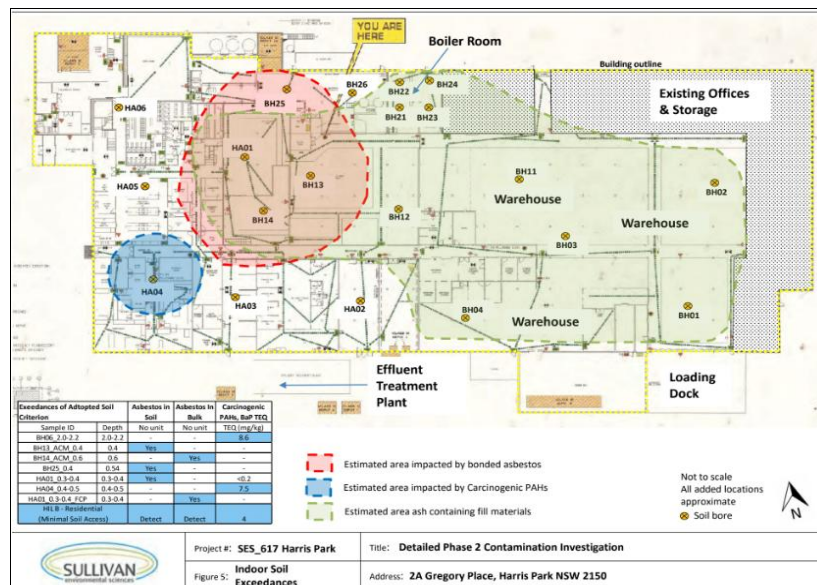


Figure 4.11: Indoor soil exceedances (Sullivan E-S 2021)



Key findings of this study are:

- Asbestos containing fibre cement fragments in fill at BH13, BH14, BH25 and HA01. Sealed under concrete beneath area of main building. Potential risk to future site users by asbestos impacted fill that requires remediation prior to or during site development.

- Gravelly sandy fill soils at HA04 and BH06 have carcinogenic PAHs. Areas sealed under concrete but potential risk that requires remediation prior to or during site development.
- Potential acid generation of soils deeper than 1.5m may not require treatment but shallower soils at boreholes BH05 and BH19 have high values.
- Exact position of suspected UST near loading dock not verified but likely under Boiler Room floor.
- Liquid contained within ETP tank is waste and requires disposal offsite during decommissioning.

The DSI recommends:

- Decommissioning of USTs.
- Remediation of impacted fill materials for bonded asbestos in and around BH13, BH14, BH25 and HA01 and remediation of impacted fill materials for carcinogenic PAHs at HA04 and BH06.
- Further investigation and assessment for a number of locations.

4.3 Geotechnical information

4.3.1 Sampling

Geotechnical investigations have been undertaken at the site. Sampling comprised drilling of five boreholes to a maximum depth of 18.0m and four boreholes drilled to a maximum depth of 7.0m.²⁷

Figure 4.12: Geotechnical sampling locations (Alliance Geotechnical Pty Ltd 2022)



²⁷ Alliance Geotechnical Pty Ltd February 2022.

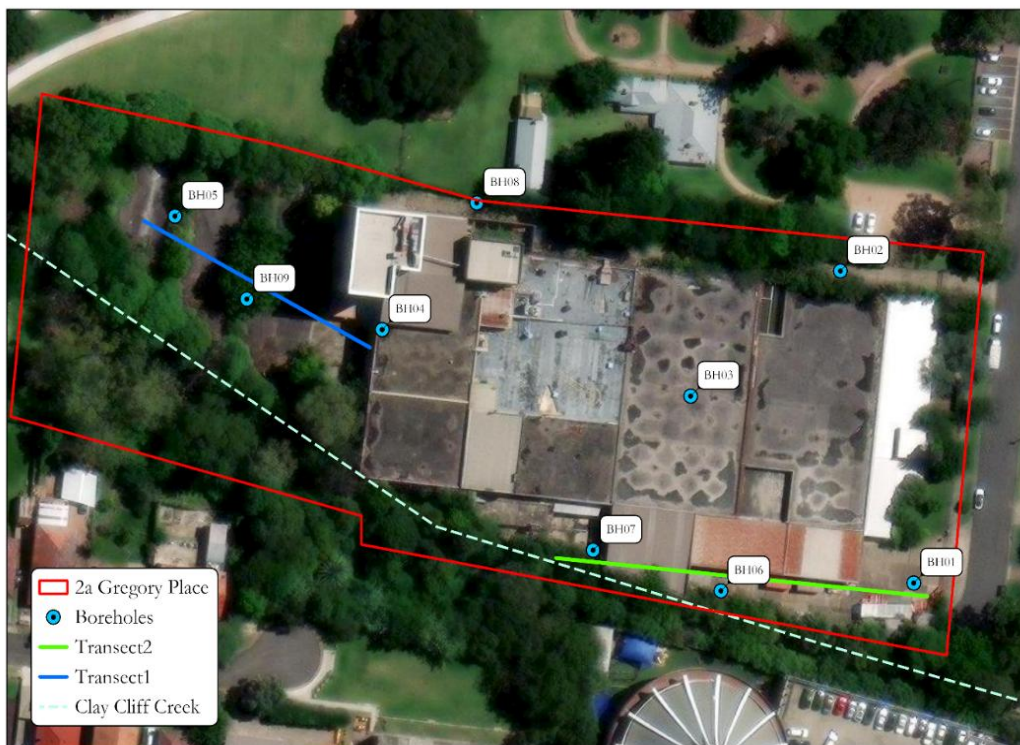
4.3.2 Bore-log data

The bore-logs for the geotechnical investigations show the subsurface profile below the existing concrete and asphalt ground surfaces across the site consists of up to 1.5m thick deposits of uncontrolled fill that is underlain by very soft to firm alluvium silty clay which is up to 5.9m thick.²⁸ Stiff to very stiff residual clay, up to 1.5m in thickness, underlies the alluvium clay in areas. The alluvial/residual soil is underlain by extremely weathered, very low strength shale (ranging in thickness from 1.1m to 5.5m), which is underlain by fresh, medium to high strength shale at -6.4mRL and -0.8mRL.

4.3.3 Subsurface profiles

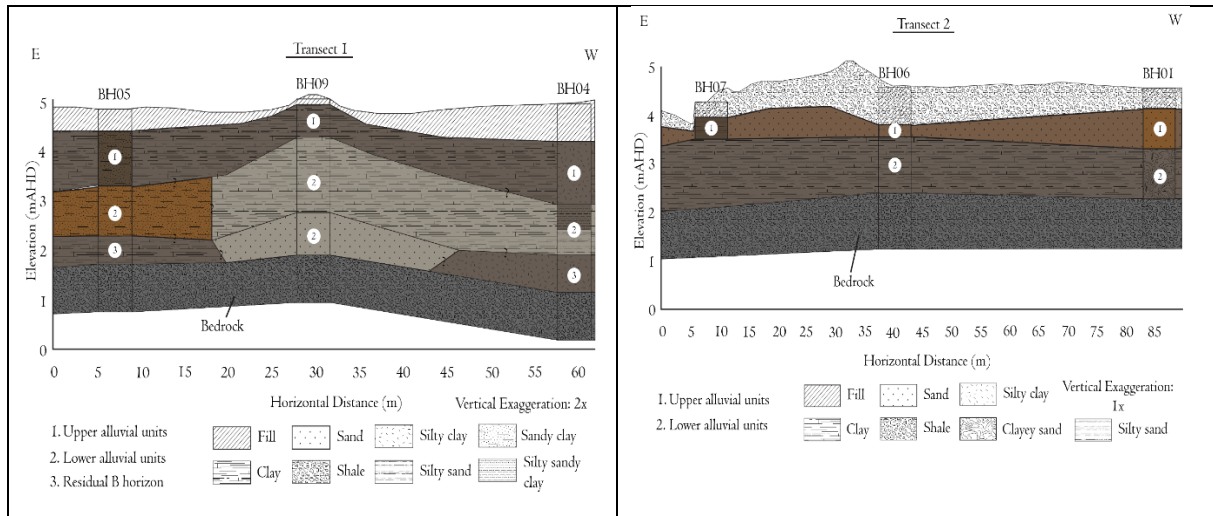
We have used the geotechnical descriptions and data and have redrawn the geotechnical bore-logs to create indicative stratigraphic profile drawings of the sediments that underlie the buildings and hard surfaces across the 2A Gregory Place site by grouping sample points in two transects as illustrated below.

Figure 4.13: Transect lines for redrawn (from geotechnical bore logs) indicative stratigraphic profile diagrams to show the subsurface deposits that are below the 2A Gregory Place site



²⁸ Ibid: Table 6 and Appendix C (bore-logs).

Figure 4.14: Subsurface deposits that are below the 2A Gregory Place site



4.3.4 Summary of the subsurface profiles at the site

The 2A Gregory Place site has been cut down by around 1.5m from current ground levels and has deposits of fill over in situ alluvial deposits. In the east there is an upper and a lower alluvial unit that is over sandstone bedrock. In the west, this two-unit alluvial sequence is over residual B-horizon clay and then bedrock and in this area there is a sandy unit that appears to truncate these in situ alluvial deposits.

5.0 Historical archaeological potential

5.1 Archaeological potential of the 2A Gregory Place site

This discussion of the potential for the 2A Gregory Place site to contain historical archaeological resources is based on consideration of the current site conditions and analysis of historical information about the occupation and development of the site. The term ‘archaeological potential’ is defined as the likelihood that a site may contain physical evidence related to an earlier phase of occupation, activity or development. The term differs from others such as ‘archaeological significance’ and ‘archaeological research potential’ which are used in following sections to make statements on the values of the potential archaeological resources at the site in terms of levels of significance and ability of the potential archaeological evidence to provide information that cannot be derived from any other source.

In general terms two factors determine archaeological potential. The first is the initial processes that occurred on a site that will determine the likelihood this process is preserved in the archaeological record (some activities leave a durable record other activities leave few). The second factor is what happens to the site afterwards. At this site this has involved modern building that may have destroyed or buried archaeological remains.

5.2 Archaeological potential of mid nineteenth century cottages

The table below breaks down generic types of archaeological remains that are often found associated with ‘typical’ nineteenth century domestic houses and gardens. This is compared with predicted archaeological evidence that could be associated with ‘Neale’s cottage’ and comment is made on the potential for each type of physical archaeological evidence to be present and/or to survive.

Table 5.1: archaeological potential of a ‘typical’ nineteenth century homestead and garden

Archaeological evidence type	Historic details
Building - building footings - underfloor deposits associated with occupation of building	Buildings on the site comprised brick cottage, stables, outbuilding - archaeological expectations are for at best shallow brick or stone footings and potential for substantial and intact evidence related to cottage is low - no underfloor deposits associated with any former building potentially on site are likely to be present
Garden - wells, cisterns, cesspits - site drainage - rubbish pits - evidence for gardens, layout and use, fence lines - pollen and soil evidence	- evidence for discrete features such as wells and water cisterns may survive, if deeply cut into B-horizon clays on ridge. - drainage and ephemeral garden features not likely to survive modern building impact

Agricultural land - evidence for land clearing, use of land for cropping, modification of landforms - rubbish dumps	- no intact early historical land surfaces or rubbish dumps are expected
---	---

5.3 Conclusions

5.3.1 Neale's cottage

There is a possibility archaeological traces related to the early agricultural history of the land may be present and survive preserved below the current site buildings and hard surfaces. 'Neale's cottage,' stables, and outbuildings were present on the south side of Hambledon cottage and within vicinity of the northern boundary of the 2A Gregory Place site before they were demolished. The cottage may have been located within the site footprint and was demolished sometime before 1943, and possibly around 1917 when the section of the Clay Cliff Creek stormwater drain that crosses the site is believed to have been constructed.

5.3.2 Land use impacts on potential historical archaeological resources

The construction of the Clay Cliff Creek stormwater channel during WW1 followed by the construction of the existing factory building post-WW2 resulted in the complete modification of the original drainage on the land and the lowering of the level of the ground through excavation by about 1.5m.

Figure 5.1: Predicted former location of 'Neale's cottage'



6.0 Significance assessment

6.1 Heritage significance

Cultural significance is defined by the *Burra Charter* as ‘*aesthetic, historic, scientific or social value for past, present or future generations*’. Significance may derive from the fabric of an item or place, its association with other items or places, or the research potential of an item or place. Linking this assessment process with a site's historical or archaeological context is currently achieved via the use of seven evaluation criteria which reflect significance categories and representativeness where a site, place or item can be evaluated in the context of State or local historical themes. Two levels of significance exist in the NSW heritage management system:

- ‘State heritage significance’, in relation to a place, building, work, relic, moveable object or precinct, means significance to the State in relation to the historical, scientific, cultural, social, archaeological, Section 4 of the Act architectural, natural or aesthetic value of the item. (Section 4A); and
- ‘local heritage significance’, in relation to a place, building, work, those places, buildings, relic, moveable object or precinct, means significance to an area in relation to the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item. (Section 4A)

6.2 Heritage significance criteria

The NSW Heritage Council has adopted specific criteria for heritage assessment related to the NSW Heritage Act 1977 as follows:

- Criterion (a) – 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).
- Criterion (b) – an item has strong or special association with the life or works of a person, or group of persons, of importance in NSW’s cultural or natural history (or the cultural or natural history of the local area).
- Criterion (c) – an item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (or the local area).
- Criterion (d) – an item has strong or special association with a particular community or cultural group in NSW (or the local area) for social, cultural or spiritual reasons.
- Criterion (e) – 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).
- Criterion (f) – 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).
- Criterion (g) – an item is important in demonstrating the principal characteristics of a class of NSW’s cultural or natural places, or cultural or natural environments.

Different components of a site, place or item may make a different relative contribution to heritage value. Loss of integrity or poor condition of archaeological sites may diminish a site or an item's significance. Relative grades to determine the heritage significance of items (both built and archaeological) include:

- **Exceptional:** Rare or outstanding item of local or State significance. High degree of intactness. Item can be interpreted relatively easily. Fulfils criteria for local or State listing.
- **High:** High degree of original fabric. Demonstrates a key element of the item's significance. Alterations do not detract from significance. Fulfils criteria for local or State listing.
- **Moderate:** Altered or modified elements. Elements with little heritage value but which contribute to the overall significance of the item. Fulfils criteria for local or State listing.
- **Little:** Alterations detract from significance. Does not fulfil criteria for local or State listing.
- **Intrusive:** Damaging to the item's heritage significance. Does not fulfil criteria for local or State listing.

To be assessed and having heritage significance an item must meet at least one of the seven significance criteria and retain the integrity of its key attributes. If an item is considered to be of State significance it should meet more than one of the seven criteria, and particularly in the case of relics, its research potential.

Archaeological Significance may be linked to other significance categories especially where sites were created as a result of specific historic event or decision, or when sites have is actual location of particular incidents, events or occurrences. Other relevant factors may be comparative values related to the intactness and rarity of individual items. The rarity of individual site types is an important factor, which should inform management decisions (NSW Heritage Office 2009).

In light of the amendments made to the definition of relics in the Heritage Act needing to be either of local or State significance, new criteria were developed in 2009 to identify whether archaeological resources are of local or State significance with the criteria identified in the

- Archaeological Research Potential (Criterion C)
- Associations with individuals, events or groups of historical importance (Heritage Criteria A, B & D)
- Aesthetic or technical significance (Criterion C)²⁹
- Ability to demonstrate the past through archaeological remains (Criterion F & G)

If a potential relic is not considered to reach the local or State significance threshold, it is not a relic according to the Heritage Act.

²⁹ Archaeological technical values is often considered under 'research potential' but aesthetic values are usually not. Archaeological excavations which reveal intact and easily understood and legible archaeological remains in the form of attractive artefacts, aged and worn fabric and remnant structures, allow the community to connect with the past through tangible archaeological physical evidence (Heritage Branch 2009).

6.3 Assessing significance related to archaeological sites and relics

The following archaeological significance assessment has been prepared in accordance with the *NSW Heritage Criteria for Assessing Significance related to Archaeological Sites and Relics*.³⁰ These guidelines provide tips and pose a number of questions to help the significance of archaeological site and relics to be understood and evaluated. Key points are tabled below.

Table 5.1. Evaluating archaeological potential according to significance criteria

<i>Archaeological Research Potential (current NSW Heritage Criterion E)</i>
To which contexts (historical, archaeological and research-based) is it anticipated that the site would yield important information? Is the site likely to contain the mixed remains of several occupations and eras, or is it expected that the site has the remains of a single occupation or a short time-period? Is the site rare or representative in terms of extent, nature, integrity and preservation of deposits (if known)? Are there a large number of similar sites? Is this type of site already well-documented in the historical record? Has this site type already been previously investigated with results available? Is the excavation of this site likely to enhance or duplicate the data set?
<i>Associations with individuals, events or groups of historical importance (NSW Heritage Criteria A, B & D).</i>
Does the archaeological site link to any NSW Historic Themes? Will the site contain 'relics' which may illustrate a significance pattern in State or local history? Is the site widely recognized? Does the site have symbolic value? Is there a community interest (past or present) which identifies with, and values the site? Is the site likely to provide material expression of a particular event or cultural identity? Is the site associated with an important person? What is the strength of association between the person and the site? Did the person live or work at the site? During the phase of their career for which they are most recognized? Is that likely to be evident in the archaeology/physical evidence of the site? Did a significant event/discovery take place at the site? Is that evident/or likely to be in the archaeology/physical evidence?
<i>Aesthetic or technical significance (NSW Heritage Criterion C)</i>
Does the site/is the site likely to have aesthetic value? Does the site/is the site likely to embody distinctive characteristics?

³⁰ NSW Heritage Branch 2009:11ff.

Does the site/is the site likely to embody a distinctive architectural/engineering style or pattern/layout?

Does the site demonstrate a technology which is the first or last of its kind?

Does the site demonstrate a range of, or change in, technology?

Ability to demonstrate the past through archaeological remains (NSW Heritage Criteria A, C, F & G)

Does the site contain well-preserved or rare examples of technologies or occupations which are typical of particular historic periods or eras of particular significance?

Was it a long-term or short-term use?

Does site demonstrate a short period of occupation and represent limited phase of the operations of a site or technology?

Or does the site reflect occupation over a long period?

Does the site demonstrate continuity or change?

Are the remains at the site highly intact, legible and readily able to be interpreted?

Archaeological research potential generally informed by three key questions;

Can the site contribute knowledge that no other resource can?

Can the site contribute knowledge which no other site can?

Is knowledge relevant to substantive questions about Australian history/other major research questions?

6.4 Assessment of significance against criteria

Criterion (a) – item is important in course, or pattern, of NSW's cultural or natural history

The 2A Gregory Place site forms a part of a large river headwaters landscape that was first partially explored by the British in early 1788 during explorations to find critically needed agricultural land. The site has associations with the earliest free settlement of land in Australia and is located close to the site of the first land grant given to a freed convict. The site also has historical associations with two early 1790s and historically prominent land grants (Experiment Farm and Elizabeth Farm) that are important in the agricultural history of Parramatta.

The 2A Gregory Place site was likely used for agricultural purposes from the 1790s but the land itself was not built-upon until the 1850s. The open storm-water channel (6m wide and 3m deep) construction has had a significant impact on the original topography and form of this drainage landform.

The subsequent construction of the existing factory buildings on the site in the 1950s has further disturbed and cut-down the original ground levels across the footprint of the site. Geotechnical records show this has occurred to a depth of least 1.0m generally below the undisturbed ground-levels that occur around adjacent Hambledon cottage and grounds, and in some locations subsurface impacts from 1950s building has also been a greater depth, and this depth of disturbance will have impacted survival chances of potential archaeological resources.

Unlike for Hambledon cottage, the potential 2A Gregory Place site historical archaeology is unlikely to be intact and possess high archaeological research potential, and is not likely to be of state significance

The history of the 2A Gregory Place site, and the nature and integrity of the potential archaeological record of this land use history that may survive, does not fulfill this criterion.

Criterion (b) – item has strong/special association with life/works of a person, or groups, of importance in NSW’s cultural history

The 2A Gregory Place site is situated within one Parramatta’s more significant historical heritage precincts and is located close to two listed SHR items (Hambledon Cottage and Experiment Farm). However, the land use history of the 2A Gregory Place site itself is not remarkable and does not stand out. It was likely used for agriculture in the early years followed by animal grazing and was not built on until the second half of the nineteenth century by the construction of ‘Neale’s Cottage.

The site has associations with the life or works of a group of persons of importance in NSW’s cultural or natural history (Macarthur family), but the potential archaeology at the site does not relate directly to the occupation and use of the site by the Macarthur’s, and in general terms the site does not fulfil this criterion.

Criterion (c) – item is important in demonstrating aesthetic/high degree of creative/technical achievement

The site is occupied by a 1950s factory that has seen multiple additions to the fabric over time and the structures do not show a high degree of creative or technical achievement and does not fulfil this criterion.

The potential historical archaeological resources that may be at the site, if they have survived the extensive depth of subsurface impacts caused by the construction of the Clay Cliff Creek stormwater channel around 1917 and the factory in the 1950s, will likely comprise building demolition remains and stone/brick footing items.

Criterion (d) – item has strong/special association with particular community/cultural group for social, cultural or spiritual reasons

The 2A Gregory Place site forms part of a wider Aboriginal cultural heritage landscape at Parramatta that has values that are important to contemporary Aboriginal communities. Aboriginal consultation undertaken for this project (separate to this assessment) establishes that contemporary cultural heritage values include in particular the care and ongoing management of the Parramatta Sand Body. The 2A Gregory Place site itself has not been flagged to possess strong or special associations by the groups that have been consulted with.

Criterion (e) – item has potential to yield information that will contribute to understanding of NSW’s cultural or natural history

The site history of land use and potential archaeological record that may have been created as a result (1850s agricultural cottage on a watercourse) is unlikely to remain intact and contain in situ and extensive historical archaeological features and deposits and as a result of these two factors the site has limited potential to yield new and significant information about the cultural and natural history of Sydney.

Criterion (f) – item possesses uncommon, rare or endangered aspects of NSW’s cultural or natural history

The site is unlikely to contain historical archaeology that is rare or uncommon and that can provide information that documents aspects of NSW’s cultural and natural history that is not available from any other source.

Criterion (g) – item is important in demonstrating the principal characteristics of a class of NSW’s cultural or natural places/environments.

The site is unlikely to contain natural and cultural (historical archaeological) deposits that may potentially be of significance under this criterion.

6.5 Evaluation

We recognise that the 2A Gregory Place site forms part of a significant early colonial heritage landscape that is linked by Clay Cliff Creek and features surviving buildings from this historical era. The land use of this time period was agricultural and potential relics and historical archaeological deposits that may be present/survive on the site are likely to be of local significance.

Potential historical archaeology that may have survived the building of the Clay Cliff Creek stormwater channel that is likely to have triggered the need for the demolition of ‘Neale’s Cottage’ is likely to have been subsequently removed by the construction of the factory buildings in the 1950s. This construction activity has truncated and lowered the ground levels that are still intact in the grounds of Hambledon cottage by about 1.5m and this impact is likely to have removed and/or extensively disturbed archaeological features that were formerly present.

On this basis, it is not expected that intact and extensive and significant historical archaeological features and deposits will survive at the site because of the scale and depth of past construction works. It is predicted that the potential historical-archaeological resources at the 2A Gregory Place site will be limited in nature and extent and archaeological integrity. These resources will also likely have limited archaeological research potential and are expected to be of local significance.

7.0 Archaeological impact assessment

7.1 Subsurface impact of the development

The proposal will require demolition of all existing buildings on the site and bulk excavation for the new buildings. The design level for the top of the excavation is 6.0mRL and the base excavation level is at -2.00mRL. Excavation will impact intact subsurface alluvial silty clays that occur below approximately 1.5m of disturbed fill material.³¹

7.2 Archaeological expectations

The land use history of the 2A Gregory Place site combined with the topographically low-lying (watercourse) landscape context suggests potential historical archaeological remains, and in the form of mid-nineteenth dwelling house on a creek, is likely to be of local archaeological significance.

The chances of archaeological survival at the site is low because of the scale of the modern building and creek alterations that occurred between about 1917 and the early 1950s. It possible deep-cut features (wells or cess pits) possibly associated with the cottage may survive below depths that have been disturbed by the construction of the factory. However, this is relatively unlikely because of the depth of the ground disturbances that are recorded at the site through land survey and geotechnical and contamination data (including bore-logs) which show ground excavations to depth of up to 1.5m which suggests that the 1950s excavations for the factory is likely to have totally removed all former evidence of the cottage.

7.3 Historical archaeological management constraints

Archaeological test excavation to establish whether relics are present at the site is not practicable or appropriate at this time because of a combination of constraints that presently exist. There is potential for soils and sediments at the site to be contaminated and asbestos was found present at a number of sampled locations and there is also potential for acid sulphate soils. The contamination study recommends remediation of impacted fill materials for asbestos and carcinogenic PAHs and additional sampling for the offices/laboratory areas and former chemical store.³²

There is also a need for approval to demolish buildings and remove large amounts of potentially contaminated fills to reach depths required (at least 1.5m) to undertake archaeological test excavation. The historical archaeological investigation strategy that is developed for the site needs to be first informed by the results of future contamination assessment.

³¹ Alliance Geotechnical Pty Ltd February 2022. Table 6 and Appendix C (bore-logs).

³² Sullivan Environmental Services. March 2022.

7.4 Historical archaeological management approach

7.4.1 Archaeological monitoring to identify if relics are present at 2A Gregory Place

Geotechnical bore-logs in the vicinity of the assumed former location of the cottage show the original ground level has been lowered by up to 1.5m, cut down by the 1950s factory construction, and the potential for substantial and intact historical archaeological features to survive is expected to be relatively low. The evidence suggests that potential historical remains that may be found to survive below the factory is unlikely to be intact, or to be substantial in nature and extent, or to have integrity and be of suitable condition for in situ conservation.

However, a caveat is that although archaeological remains are not expected to be present below the factory footprint unexpected archaeological finds of potential heritage value cannot be discounted. It is desirable to identify early as possible whether archaeological remains of the cottage or any other relics are present on the site and this can be achieved through completing archaeological supervision and monitoring and recording of below ground disturbance works following demolition of above ground buildings and hard surfaces on the site.

7.4.2 Archaeological excavation if relics are present at 2A Gregory Place

A target of archaeological monitoring would be the former location of 'Neale's cottage'. Controlled archaeological excavation would be undertaken to salvage relics that may be identified. Archaeological monitoring would be guided by an archaeological monitoring method statement.³³ If archaeology is identified during monitoring, all resultant archaeological excavation would be completed following current HNSW guidelines.

7.5 Next steps in the archaeological management of the site

The next steps in the historical archaeological heritage management process for the 2A Gregory Place site is:

1. Evaluate the findings of future contamination assessments and building demolition planning.
2. Develop an archaeological monitoring method and an archaeological research design and test excavation methodology for the site that is based on the results of contamination assessment and consideration of demolition planning.

³³ Heritage NSW provide guidance on archaeological monitoring of relics of local heritage significance in the guideline 'Relics of local heritage significance: a guide for archaeological monitoring' (nd).

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