

The logo for URBIS, featuring the word "URBIS" in a bold, white, sans-serif font. The text is positioned to the left of a white square frame that is partially open on the right side. A white vertical line extends from the top of the frame, and a white horizontal line extends from the right side of the frame, creating a crosshair effect.

URBIS

PRELIMINARY HISTORICAL ARCHAEOLOGICAL ASSESSMENT

25-27 Leeds Street. Rhodes, NSW

Prepared for
BILLBERGIA PTY LTD
14 June 2024

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

| | |
|--------------------|--|
| Associate Director | Ali Byrne, BA Archaeology (Hons) |
| Senior Consultant | Alexandra Ribeny, BA Archaeology (Hons), M Arch Sci |
| Consultant | Kirsten Downey, BA Archaeology (Hons) |
| Project Code | P0052299 |
| Report Number | Draft issued to client – 14/5/2024 Final issued to client – 14/6/2024 |

**Urbis acknowledges the important contribution that
Aboriginal and Torres Strait Islander people make in
creating a strong and vibrant Australian society.**

**We acknowledge, in each of our offices, the Traditional
Owners on whose land we stand.**

All information supplied to Urbis in order to conduct this research has been treated in the strictest confidence.
It shall only be used in this context and shall not be made available to third parties without client authorisation.
Confidential information has been stored securely and data provided by respondents, as well as their identity, has been treated in the strictest confidence and all assurance given to respondents have been and shall be fulfilled.

© Urbis Ltd
50 105 256 228

All Rights Reserved. No material may be reproduced without prior permission.

You must read the important disclaimer appearing within the body of this report.

urbis.com.au

CONTENTS

| | |
|--|-----------|
| Executive Summary..... | 5 |
| 1. Introduction | 7 |
| 1.1. Subject Area | 7 |
| 1.2. Proposed Works | 8 |
| 1.3. Methodology | 16 |
| 1.4. Authorship | 16 |
| 1.5. Limitations | 16 |
| 2. Statutory Context | 17 |
| 2.1. Heritage Controls | 17 |
| 2.1.1. Environment Protection and Biodiversity Conservation Act 1999 | 17 |
| 2.1.2. NSW Heritage Act 1977 | 17 |
| 2.1.3. Canada Bay Local Environment Plan 2013 | 17 |
| 2.2. Heritage Lists & Registers | 19 |
| 2.2.1. NSW State Heritage Inventory | 19 |
| 2.2.2. Australian Heritage Database | 19 |
| 2.3. Summary | 19 |
| 3. Archaeological Context | 21 |
| 3.1. Abbreviated Historical Overview | 21 |
| 3.1.1. Phase 1 – Farmland within the Early Land Grants (1794-1895) | 21 |
| 3.1.2. Phase 2 – First Subdivisions and Timberyard (1895-1955) | 24 |
| 3.1.3. Phase 3 – Industrial Depot (1955-1986) | 28 |
| 3.1.4. Phase 4 – Warehouse Facility (1986-present) | 30 |
| 3.2. Historical Disturbance | 32 |
| 3.3. Previous Archaeological Investigations | 32 |
| 3.3.1. Investigations of Subject Area | 32 |
| 3.3.2. Investigations of Surrounding Area | 32 |
| 3.3.2.1. Conclusions from Previous Investigations..... | 33 |
| 3.4. Geotechnical and Contamination investigations | 34 |
| 3.5. Summary | 35 |
| 4. Preliminary Assessment of Archaeological Potential | 36 |
| 4.1. Framework for Assessment | 36 |
| 4.2. Assessment of Archaeological Potential and Significance | 36 |
| 4.3. Summary | 39 |
| 5. Conclusions & Recommendations | 40 |
| 6. References | 42 |
| Disclaimer | 43 |

FIGURES

| | |
|--|----|
| Figure 1 – Regional location of the subject area | 9 |
| Figure 2 – Location of the subject area | 10 |
| Figure 3 – Site Plan – Proposed Context | 11 |
| Figure 4 – Ground floor level (Level 01) | 12 |
| Figure 5 – Basement 01 plan. | 13 |
| Figure 6 – Basement 02 plan | 14 |
| Figure 7 – Section A. | 15 |
| Figure 8 – Heritage context of subject area..... | 20 |
| Figure 9 – Extract from early 19 th Century land grant showing the subject area as located in the Meredith land grant | 22 |

| | |
|--|----|
| Figure 10 – Early map from c.1875 showing the subject area as located within the Blaxland land. | 22 |
| Figure 11 – Extract of a map from 1896 showing the subject area with the Meredith land grant. The railway line is shown running north across the Rhodes peninsula. | 23 |
| Figure 12 – Extract of North Strathfield, Concord West and Rhodes subdivision plans [1895] | 25 |
| Figure 13 – Subdivision map of the Rhodes Estate [1910] showing the subject area within DP 5923 Sections 1-2 on Llewellyn Street. | 26 |
| Figure 14 – Extract of 1914 map showing the subdivision of the Rhodes area. | 27 |
| Figure 15 – 1922 cartographic map of the subject area as located within a timber yard leased to the Minister for Public Works. Location of subject area indicated by green arrow. | 27 |
| Figure 16 – 1955 aerial photograph of the subject area evidencing use of the site as an industrial goods depot. | 28 |
| Figure 17 – [Item 32: Milton Kent aerial views of Bankstown, Blacktown, Manly, Rhodes, 1956] View of the subject area containing timber and cleared land. | 29 |
| Figure 18 – 1965 aerial photograph of the subject area evidencing the continuation of the site as a industrial storage depot. | 29 |
| Figure 19 – 1986 aerial photograph of the subject area showing the establishment of a warehouse facility. | 31 |
| Figure 20 – 1991 aerial photograph showing the use of the subject area as a warehouse facility. | 31 |
| Figure 21 – Photograph of the subject area in 1991 from the Parramatta River demonstrating the extant warehouse facility. Source: City of Canada Bay Local Studies Collection | 32 |

TABLES

| | |
|---|----|
| Table 1 – SEARs requirements. | 5 |
| Table 2 – SEARs requirements. | 7 |
| Table 3 – Heritage items located within proximity of the subject area – Canada Bay LEP 2013 | 19 |
| Table 4 – Assessment of Archaeological Potential | 37 |

EXECUTIVE SUMMARY

Urbis has been engaged by Billbergia Pty Ltd ('the Proponent') to prepare a Preliminary Historical Archaeological Assessment (PHAA) in relation to 25-27 Leeds Street, Rhodes ('the subject area'). The subject area is legally referred to as Lot 2 DP 1192949, Lot A DP 329241, Lot C DP 367132 and is located within the City of Canada Bay LGA (Figure 1 and Figure 2).

This ACHA has been prepared to support a State Significant Development Application (SSD- 67419241), seeking approval for the demolition of existing buildings and the construction of six mixed use residential towers.

Under the Planning Systems State Environmental Planning Policy (SEPP) Clause 26A, in-fill affordable housing developments with an Estimated Development Cost over \$75 million in Greater Sydney fall under State significant development provisions of the EP&A Act, and Industry Specific requirements apply.

The *Planning Secretary's Environmental Assessment Requirements* (SEARs) were issued on 09 February 2024. This report has been prepared to address the SEARs issued for the project (SSD-67419241).as presented in Table 1 below.

Table 1 – SEARs requirements.

| Item | Requirement | Documentation |
|----------------------------|---|--------------------------------------|
| 19. Environmental Heritage | Where there is potential for direct or indirect impacts on the heritage significance of environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (if potential impacts to archaeological resources are identified), prepared in accordance with the relevant guidelines, which assesses any impacts and outlines measures to ensure they are minimised and mitigated. | Addressed by the Present PHAA report |

This PHAA has been undertaken as a means of addressing the above assessment requirement by undertaking a preliminary assessment of historical archaeological potential based on:

- a review of heritage databases and relevant archaeological publications to establish the known historical archaeological values of the site; and
- a review of the historical development of the subject area, as outlined in Section 3.1, to undertake a preliminary assessment of archaeological potential.

The following preliminary assessment does not constitute a formal Historical Archaeological Assessment (HAA) in accordance with the Archaeological Assessments Guidelines (Heritage Office, Department of Urban Affairs and Planning 1996).

Archaeological Potential

This PHAA has established the following in relation to the archaeological potential of the subject area:

- There is **low potential** for archaeological resources (of local or State significance) associated with *Phase 1 – Farmland within the Early Land Grants (1794-1895)* due to the ephemeral nature of the potential resource and degree of subsequent disturbance.
- There is **low potential** for archaeological resources associated with *Phase 2 – First Subdivisions and Timberyard (1895-1955)* due to the absence of substantial structures and degree of subsequent disturbance. These are unlikely to meet the threshold for either local or state significance.
- There is **moderate potential** for resources associated with *Phase 3 – Industrial Depot (1955-1986)* due to the high historical land use during this period. These are unlikely to meet the threshold for either local or state significance.

- There is **no archaeological potential** identified for *Phase 4 – Warehouse Facility (1986-present)*.

Due to the low archaeological potential across the site for all identified phases, it is unlikely that any proposed works will impact archaeological relics.

In light of the above findings, Urbis makes the following recommendations.

Recommendation 1 – Submission of Report for SSD- 67419241

This Preliminary Historical Archaeological Assessment should be submitted with the EIS for SSD-67419241 as a record of the assessment that has been undertaken to fulfil Item 19 of the SEARs. In the case of this project, it is assessed that impacts to historical archaeological relics as a result of the proposed development are unlikely.

Recommendation 2 – Avoid impacts outside assessed area

Proposed works must avoid any impacts (or potential impacts) to the riverside adjacent to the subject area. The Parramatta River shore may contain submerged archaeological remains associated with the former industrial use of the land, and this has not been assessed as part of this report. In the event that access associated with the project is required via water for any reason, further assessment will be required.

Recommendation 3 – Unexpected Finds and Human Remains Procedure

Although the likelihood of the subject area retaining any historical relics is low, it is recommended that unexpected finds and human remains procedures be implemented as harm mitigation measures.

If any archaeological deposits or features are unexpectedly discovered during any site works, the following steps must be carried out:

1. All works within the vicinity of the find must immediately stop. The find must not be moved 'out of the way' without assessment. The find must be cordoned-off and signage installed to avoid accidental impact.
2. The site supervisor or another nominated site representative must contact either the project archaeologist (if relevant) or Heritage NSW (Enviroline 131 555) to contact a suitably qualified archaeologist.
3. The nominated archaeologist must examine the find, provide a preliminary assessment of significance, record the item and decide on appropriate management measures. Such management may require further consultation with Heritage NSW, preparation of a research design and archaeological investigation/salvage methodology and notification of the discovery of a relic to Heritage NSW in accordance with S.146 of the Heritage Act 1977.
4. Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required and further archaeological investigation undertaken.
5. Reporting may need to be prepared regarding the find and approved management strategies.
6. Works in the vicinity of the find would only recommence upon receipt of approval from Heritage NSW.

Should clearly identifiable human remains be uncovered anywhere within the subject area, the following procedure should be implemented:

1. All works within the vicinity of the find must immediately stop. The find must be cordoned-off and signage installed to avoid accidental impact.
2. The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW (Enviroline 131 555).
3. The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.
4. Management recommendations are to be formulated by the NSW Police, Heritage NSW and site representatives.
5. Works are not to recommence until the find has been appropriately managed.

In the event that bones are uncovered which may be human but cannot be confirmed by onsite staff, a suitably qualified archaeologist or heritage specialist should be contacted in the first instance to determine how to proceed.

1. INTRODUCTION

Urbis has been engaged by Billbergia Pty Ltd ('the Proponent') to prepare a Preliminary Historical Archaeological Assessment (PHAA) in relation to 9 Blaxland Road and 424 Concord Road, Rhodes ('the subject area'). The subject area is legally referred to as Lot 2 DP 1192949, Lot A DP 329241, Lot C DP 367132 and is located within the City of Canada Bay LGA (Figure 1 and Figure 2).

This ACHA has been prepared to support a State Significant Development Application (SSD- 67419241), seeking approval for the demolition of existing buildings and the construction of six mixed use residential towers.

Under the Planning Systems State Environmental Planning Policy (SEPP) Clause 26A, in-fill affordable housing developments with an Estimated Development Cost over \$75 million in Greater Sydney fall under State significant development provisions of the EP&A Act, and Industry Specific requirements apply.

The *Planning Secretary's Environmental Assessment Requirements* (SEARs) were issued on 09 February 2024. This report has been prepared to address the SEARs issued for the project (SSD-67419241).as presented in Table 2 below.

Table 2 – SEARs requirements.

| Item | Requirement | Documentation |
|----------------------------|---|--------------------------------------|
| 19. Environmental Heritage | Where there is potential for direct or indirect impacts on the heritage significance of environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (if potential impacts to archaeological resources are identified), prepared in accordance with the relevant guidelines, which assesses any impacts and outlines measures to ensure they are minimised and mitigated. | Addressed by the Present PHAA report |

This PHAA has been undertaken as a means of addressing the above assessment requirements by undertaking a preliminary assessment of historical archaeological potential based on:

- a review of heritage databases and relevant archaeological publications to establish the known historical archaeological values of the site; and
- a review of the historical development of the subject area, as outlined in Section 3.1, to undertake a preliminary assessment of archaeological potential.

The following preliminary assessment does not constitute a formal Historical Archaeological Assessment (HAA) in accordance with the Archaeological Assessments Guidelines (Heritage Office, Department of Urban Affairs and Planning 1996).

1.1. SUBJECT AREA

The subject area is located at 25-27 Leeds Street, Rhodes ('the subject area') within the City of Canada Bay Local Government Area (LGA). The subject area is legally referred to as Lot 2 DP 1192949, Lot A DP 329241, Lot C DP 367132. Rhodes is approximately 12km north-west of Sydney Central Business District (CBD).

The existing development includes a warehouse facility with a frontage to the Parramatta River to the north and Leeds Street to the south. The subject area is zoned MU1 – Mixed Use with a total site area consisting of 11,692 sqm. The topography of the subject area slopes heavily and there are no existing basement levels.

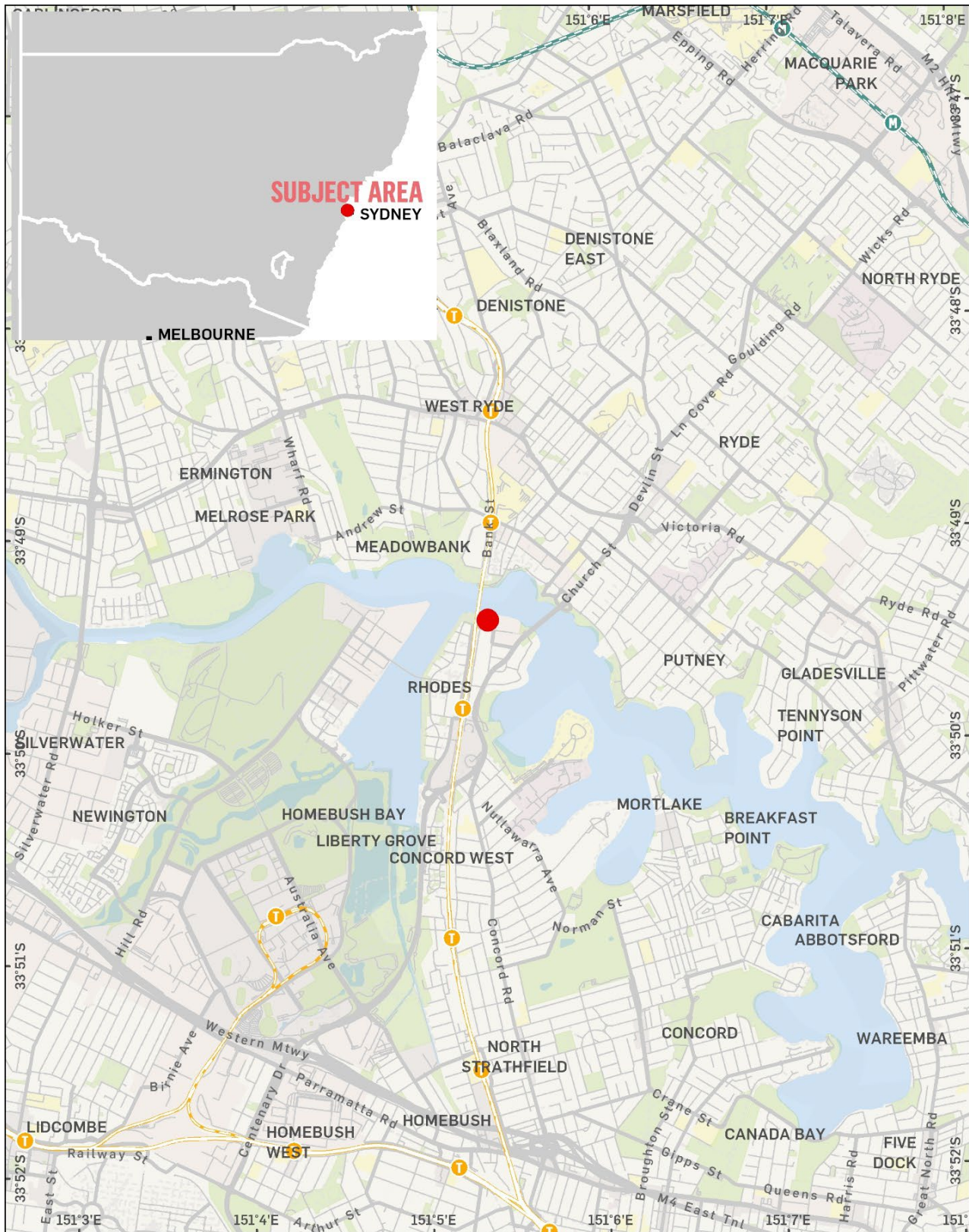
1.2. PROPOSED WORKS

The proposal includes the construction of six mixed use residential towers.

The proposed works include the demolition of existing buildings and hardstand areas, site preparation works, removal of trees and construction comprising:

- Demolition of existing buildings and structures.
- Earthworks, excavation and retaining walls.
- Construction of six (6) mixed use residential towers, ranging in height from 10 to 18 storeys.
- Through site links, foreshore park and promenade.
- On-site car parking and loaded within a consolidated basement, accessed from Blaxland Road. The proposed basement will be located partially underground due to the sloped topography.

The plans of the proposed works are shown in Figure 3 to Figure 7 provided below.



GDA 1994 MGA Zone 56

© 2024. Data: ABS, OpenStreetMap. Helping shape our cities, one map at a time. Mar 2024



Project No: P0052299

Project Manager: Aaron Olsen

Subject Area

REGIONAL LOCATION
25-27 Leeds Street
Billbergia Pty Ltd

Figure 1 – Regional location of the subject area



GDA 1994 MGA Zone 56

© 2024. Data: ABS, OpenStreetMap, Nearmap. Helping shape our cities, one map at a time. Mar 2024



Project No: P0052299

Project Manager: Aaron Olsen

Subject Area Contours Hydrology

LOCATION OF THE SUBJECT AREA
25-27 Leeds Street
Billbergia Pty Ltd

Figure 2 – Location of the subject area

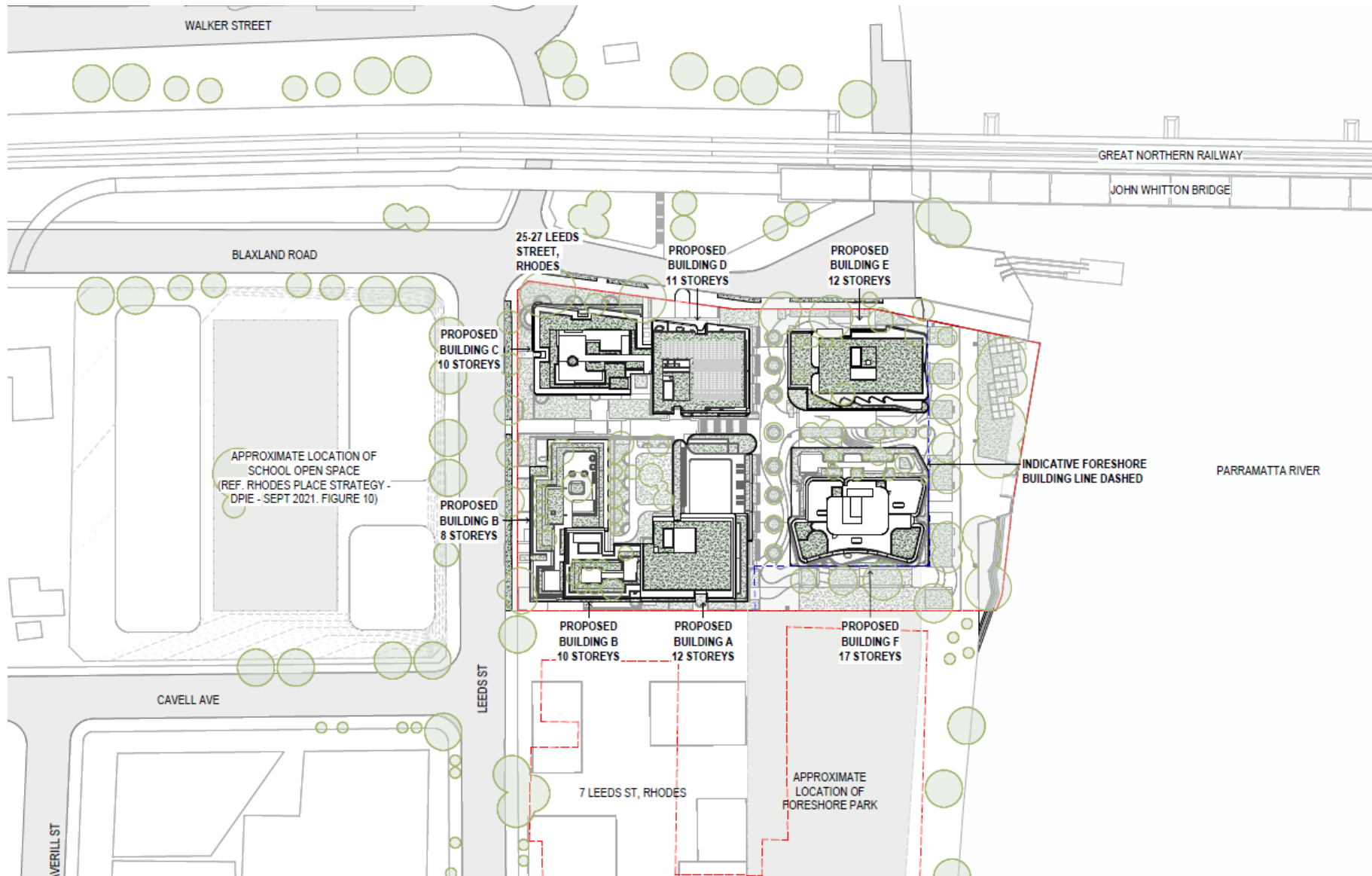


Figure 3 – Site Plan – Proposed Context

Source: SJB Architects, DA- 0102, 28.5.2024

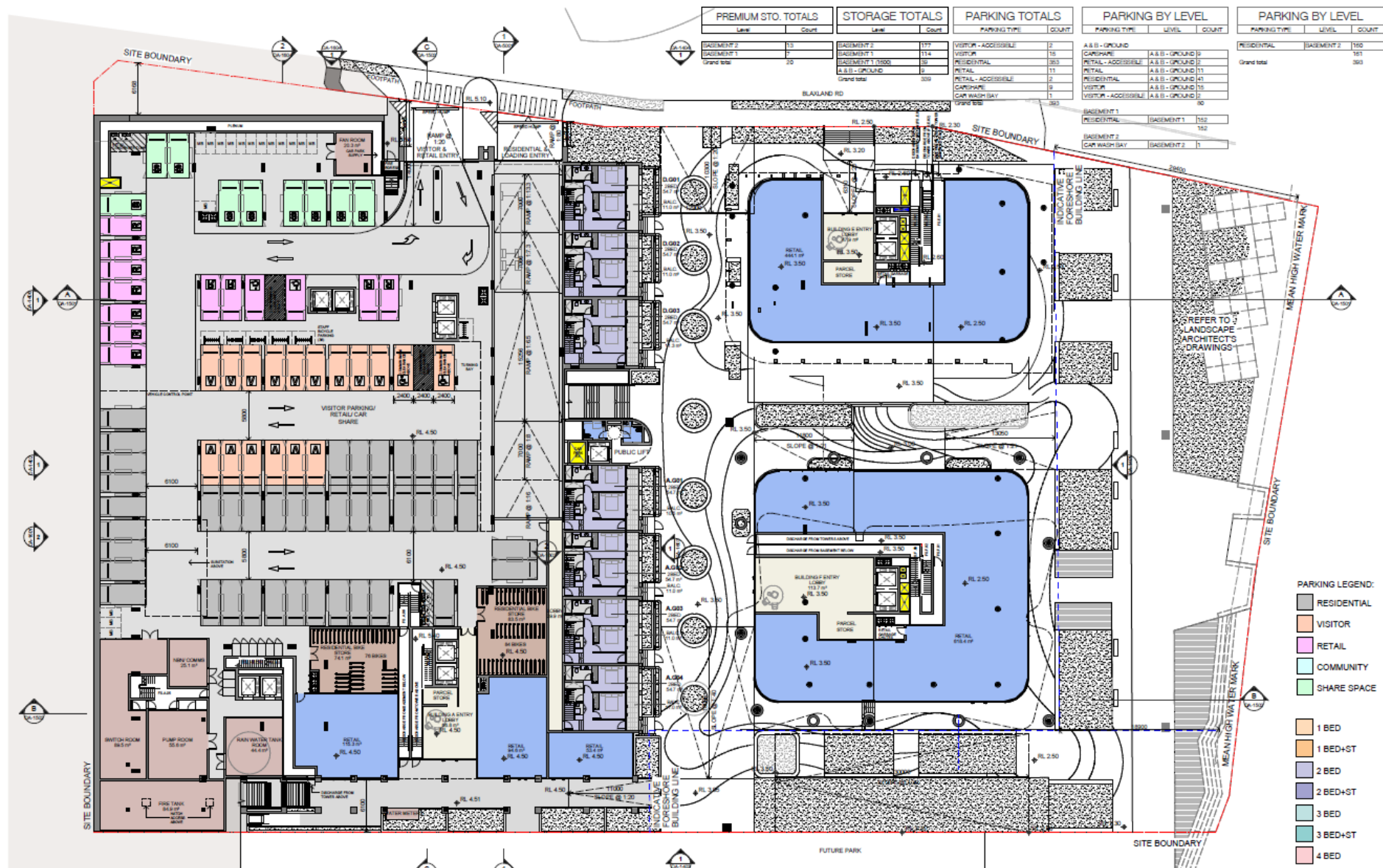


Figure 4 – Ground floor level (Level 01)

Source: SJB Architects, DA-1001, 17.5.24

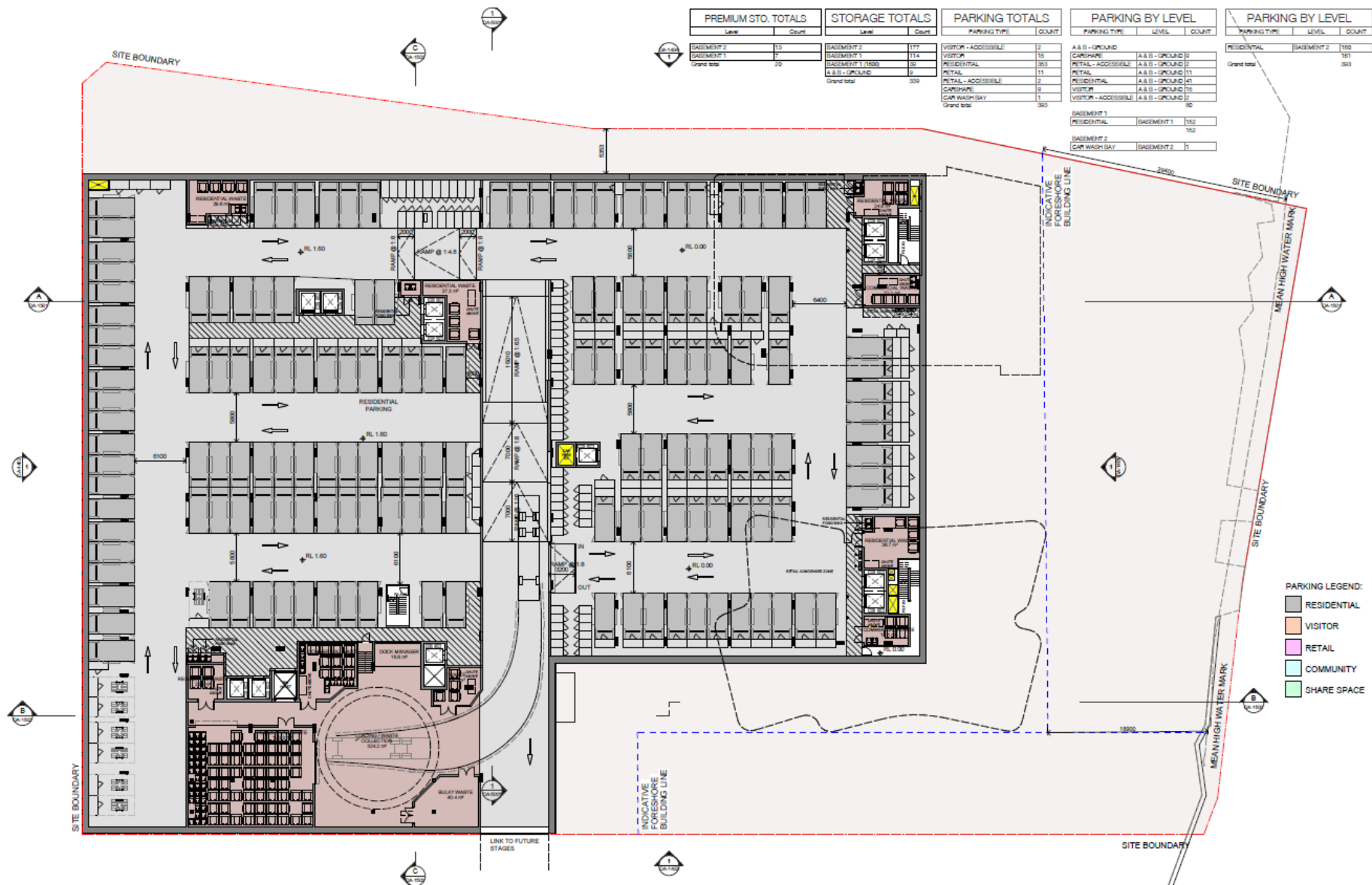


Figure 5 – Basement 01 plan.

Source: SJB Architects, Drawing No. DA-1000, 17.5.24

1.3. METHODOLOGY

The PHAA was undertaken as a preliminary assessment of historical archaeological potential and includes the following:

- Searches of statutory and non-statutory heritage listings (Section 2.2).
- Preliminary historical research on the subject area including analysis of historic mapping and imagery (Section 3.1).
- Analysis of relevant archaeological assessments (Section 3.3).
- Assessment of archaeological potential (Section 4.2).
- Provision of recommendations for the management of archaeological relics (Section 5).

1.4. AUTHORSHIP

The present report has been prepared by Kirsten Downey (Consultant Archaeologist), with review and quality control undertaken by Alexandra Ribeny (Senior Archaeologist) and Ali Byrne (Urbis Associate Director, Archaeologist).

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

1.5. LIMITATIONS

The PHAA was undertaken to investigate historical archaeological potential within the subject area. It does not consider Aboriginal archaeology or built heritage values. Additionally, the report does not include the assessment of potential submerged archaeology in the adjacent portions of the river which is not included in the scope.

This PHAA does not constitute an Historical Archaeological Impact Assessment (HAIA), which complies with the relevant guidelines, and is intended only to investigate whether further assessment is required.

2. STATUTORY CONTEXT

2.1. HERITAGE CONTROLS

The protection and management of heritage items, places and archaeological sites within New South Wales is governed by the relevant Commonwealth, State or local government legislation. These are discussed below in relation to the present subject area.

2.1.1. Environment Protection and Biodiversity Conservation Act 1999

In 2004, a new Commonwealth heritage management system was introduced under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The EPBC Act protects any items listed in the National Heritage List (NHL) and the Commonwealth Heritage List (CHL).

The National Heritage List (NHL) is a list of natural, historic and Indigenous places of outstanding significance to the nation. It was established to protect places that have outstanding value to the nation.

The Commonwealth Heritage List (CHL) was established to protect items and places owned or managed by Commonwealth agencies. The Australian Government Department of Sustainability, Environment, Water, Population and Communities (DSEWPC) is responsible for the implementation of national policy, programs and legislation to protect and conserve Australia's environment and heritage and to promote Australian arts and culture. Approval from the Minister is required for controlled actions which will have a significant impact on items and places included on the NHL or CHL.

2.1.2. NSW Heritage Act 1977

The *NSW Heritage Act 1977* (the Heritage Act) provides protection to items of environmental heritage in NSW. Heritage items protected under the Heritage Act include places, buildings, works, relics, moveable objects and precincts identified as significant based on historical, social, aesthetic, scientific, archaeological, architectural, cultural or natural values.

State significant items are listed on the NSW State Heritage Register (SHR) and are given automatic protection under the Heritage Act against any activities that may damage an item or affect its heritage significance. Under Section 57(1) of the Heritage Act, Heritage Council approval is required to move, damage, or destroy a 'relic' listed in the SHR, or to excavate or disturb land which is listed on the SHR and there is reasonable knowledge or likelihood of relics being disturbed.

Section 4 of the Heritage Act defines a 'relic' as:

Any deposit, object or material evidence

(a) which relates to the settlement of the area that comprises New South Wales, not being an Aboriginal settlement, and;

(b) is of State or local heritage significance.

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

The current PHAA has been undertaken to determine the likelihood of any local or State archaeological resources being retained within the subject area.

2.1.3. Canada Bay Local Environment Plan 2013

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

The subject area falls within the City of Canada Bay Local Government Area ('City of Canada Bay LGA') and is subject to the Canada Bay Local Environmental Plan 2013 ('Canada Bay LEP 2013'). The LEP identifies

items and areas of local heritage significance and outlines development consent requirements. Under Section 5.10, Clause 2 of the Canada Bay LEP 2013, development consent is required when:

(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,

(ii) an Aboriginal object,

(iii) a building, work, relic or tree within a heritage conservation area,

(b) altering a heritage item that is a building by making structural changes to its interior or by making changes to anything inside the item that is specified in Schedule 5 in relation to the item,

(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,

(e) erecting a building on land—

(i) on which a heritage item is located or that is within a heritage conservation area, or

(ii) on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance,

(f) subdividing land—

(i) on which a heritage item is located or that is within a heritage conservation area, or

(ii) on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance.

Under Section 5.10 Clause 7, it is specified that:

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

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

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

Historical archaeological sites are listed under Part 1 of Schedule 5 of the Canada Bay LEP 2013.

Under Division 4.7 of the EP&A Act, some legislation “does not apply” to development that is State significant development. This development requires approval from the Minister for Planning or Independent Planning Commission. Approval may be granted for SSDs even if they do not comply with elements of a local planning instrument. As such, LEP clauses regarding heritage protections may be superseded for an SSD. With regards to historical archaeology, this includes “*an approval under Part 4 or an excavation permit under Section 139, of the Heritage Act 1977.*” However, SSD approvals still require that relevant environmental regulations be considered as part of the assessment process, including those related to historical archaeology.

2.2. HERITAGE LISTS & REGISTERS

A review of relevant heritage lists and registers was undertaken to determine whether any historical archaeological heritage items are located within the curtilage of the subject area.

2.2.1. NSW State Heritage Inventory

The State Heritage Inventory (SHI) is a database of heritage items in NSW which includes declared Aboriginal Places, items listed on the SHR, listed Interim Heritage Orders (IHOs) and items listed of local heritage significance on a local council's LEP.

A search of the SHI was undertaken on 15 March 2024. The search did not identify any heritage items within the curtilage of the subject area, however, it is located within proximity of the following heritage items, as identified in Table 3 below and Figure 8.

Table 3 – Heritage items located within proximity of the subject area – Canada Bay LEP 2013

| Item Name | Item No. | Address | Level |
|--|----------|--|-------|
| Meadowbank rail bridge over Parramatta River | I542 | Main Northern Railway Meadowbank, NSW, 2114 | State |
| Warehouse | I77 | 14 Cavell Avenue Rhodes NSW 2138 | Local |

2.2.2. Australian Heritage Database

The Australian Heritage Database is a database of heritage items included in the World Heritage List, the National Heritage List (NHL), the Commonwealth Heritage list (CHL) and places in the Register of the National Estate. The list also includes places under consideration, or that may have been considered, for any one of these lists.

A search of the Australian Heritage Database was undertaken on 15th March 2024. The search did not identify any heritage items within the curtilage of the subject area.

2.3. SUMMARY

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

- In view of the protections afforded to heritage items by the EPBC Act, Heritage Act, and the Sydney LEP 2012, and the relevant condition of the SEARs, the current PHAA has been undertaken to determine the likelihood of historical archaeological remains being retained within the subject area.
- The subject area does not contain any heritage items or historical sites listed under Part 1 (respectively) of Schedule 5 of the Canada Bay LEP 2013 (Figure 8).
- The subject area is located within proximity of two heritage items listed under Part 1 of Schedule 5 of the Canada Bay LEP 2013.

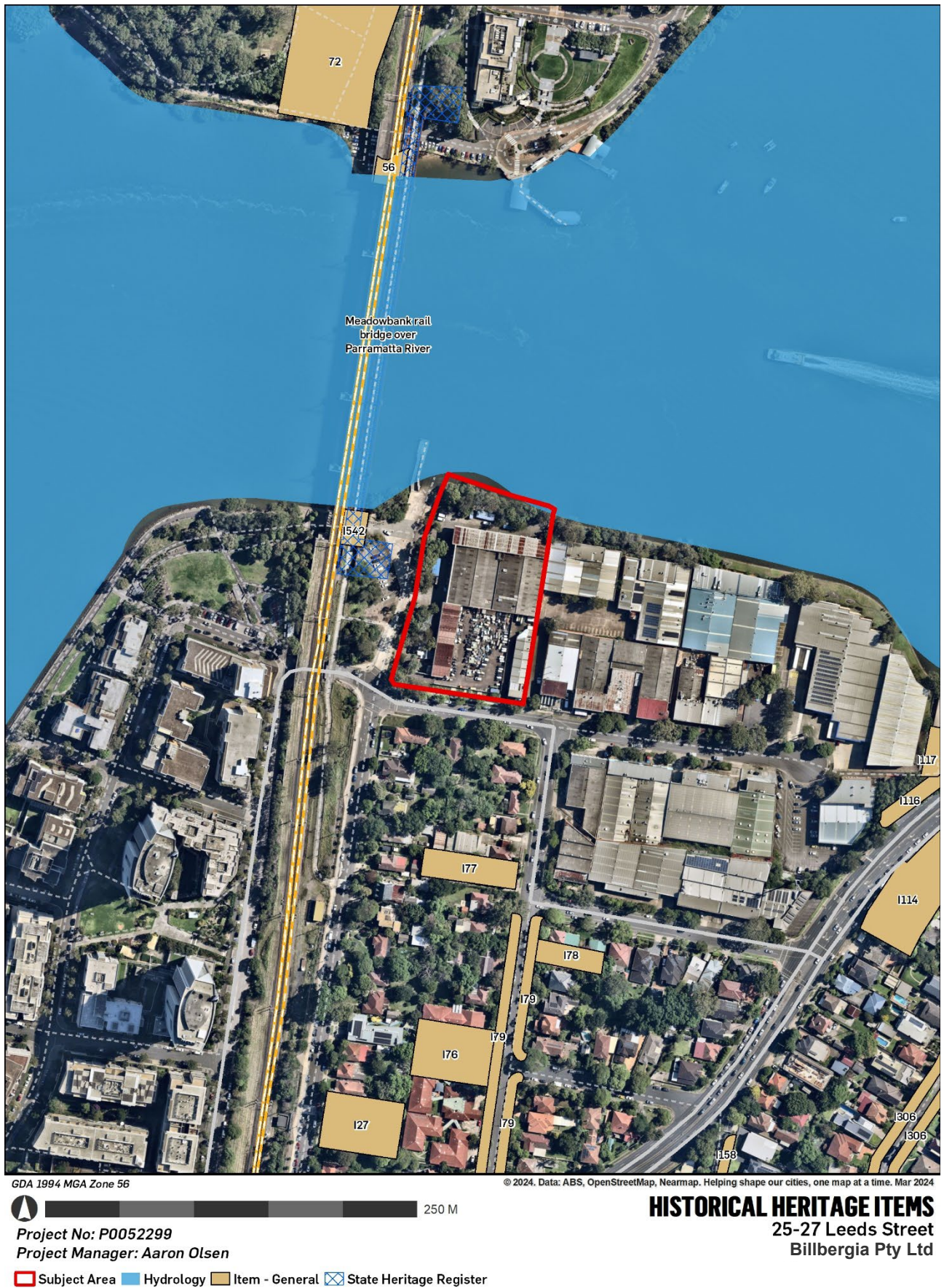


Figure 8 – Heritage context of subject area

3. ARCHAEOLOGICAL CONTEXT

3.1. ABBREVIATED HISTORICAL OVERVIEW

The historical context of the subject area provides the basis for assessing what may be retained in the ground as archaeological evidence of past development. This section provides an abbreviated history for the subject area for the purpose of identifying historical archaeological potential.

The historical context is discussed in detail below in relation to the following development and use phases:

- Phase 1 – Farmland within the Meredith land grant (1794-1895)
- Phase 2 – First Subdivisions and Industrial Use (1895-1954)
- Phase 3 – Industrial Depot (1955-1986)
- Phase 4 – Warehouse Facility (1986-present)

3.1.1. Phase 1 – Farmland within the Early Land Grants (1794-1895)

The subject area was located within the 60-acre allotment of land granted to Frederick Meredith in 1794. (Figure 9). The grant was one of three made by Governor Hunter which divided the Rhodes peninsula. Donnelly and Bray were the other recipients of the land grants. Meredith arrived in the colony of NSW on the ship *Sirius* by the solicitation of Governor Phillip as a free settler. Listed as a baker on the official records, he was granted other land in the area included land further south which he named 'Charlotte Farm'.

A map from c.1875 shows that the western portion of the Rhodes Peninsula belongs to Thomas Walker (Figure 10).¹ Walker had arrived in Port Jackson by 1818 and is noted as having bought the land from Meredith soon after his arrival. The Rhodes house located on the Estate was built by Walker and was named Rhodes after his family's estate in England.

The subject area was located in close proximity to the railway and Concord Road (Figure 11). On the 1814 list of settlers, Meredith is shown as still owning the land in 'Concord'. The land is described as being located north of Mary Bray's land.

Within the c.1877 map, the subject area is located in proximity to an early road and within an area of a cleared paddock. No other development is present close to the subject area. Given there was no development during this time as indicated on early parish maps, it is likely that farming was the main activity that occurred during this time.

Due to the relative isolation of the area, as well as a lack of funds and personnel, early farming attempts were not successful. According to the reports of the Reverend Samuel Marsden and the Surgeon Arndell, the Concord and Liberty Plains area was not conducive to farming exploits of the early settlers despite their efforts to the contrary. The report by Marsden and Arndell described the land as the following:

"the land in the Concord district is more rich and fertile than any we have visited, though not so good in Liberty Plains....Though the ground in general appears to be very rich, yet the farmers in it are very poor and greatly involved in debt and are now living upon credit. Most of them have no seed-wheat, and have every appearance of approaching ruin...Under their present circumstances they will not be able to long hold their lands, but must shortly come to ruin and destruction".²

¹ Ida McAulay, 'Walker, Thomas (1791–1861)', Australian Dictionary of Biography, National Centre of Biography, Australian National University, <https://adb.anu.edu.au/biography/walker-thomas-2766/text3927>, published first in hardcopy 1967, accessed online 26 March 2024.

² Royal Australian Historical Society. 1918, *Journal and proceedings*, The Society, Sydney, viewed 18 March 2024 <http://nla.gov.au/nla.obj-594389496>, page 103-104

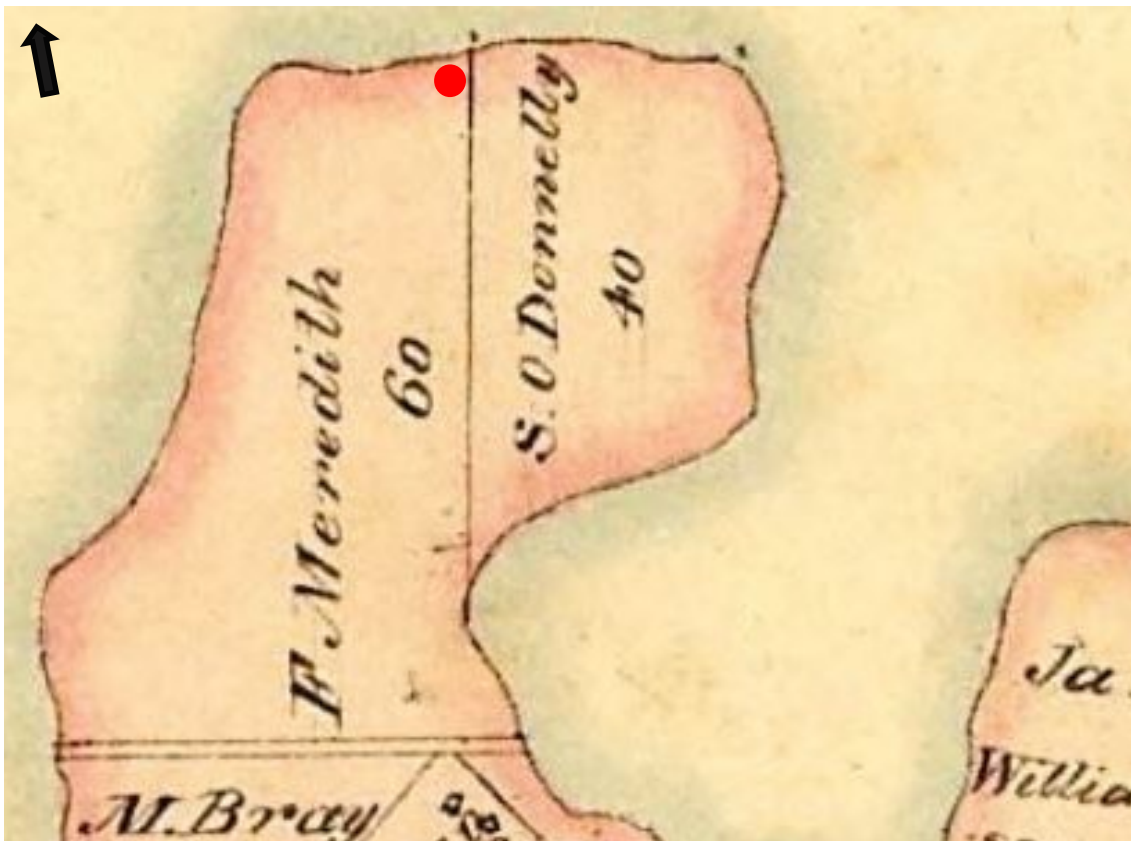


Figure 9 – Extract from early 19th Century land grant showing the subject area as located in the Meredith land grant.

Source: HLRV, County of Cumberland, Parish of Concord



Figure 10 – Early map from c.1875 showing the subject area as located within the Blaxland land.

Source: SLNSW, Call numbers: Z/SP/811.1839 , SP/811.1839

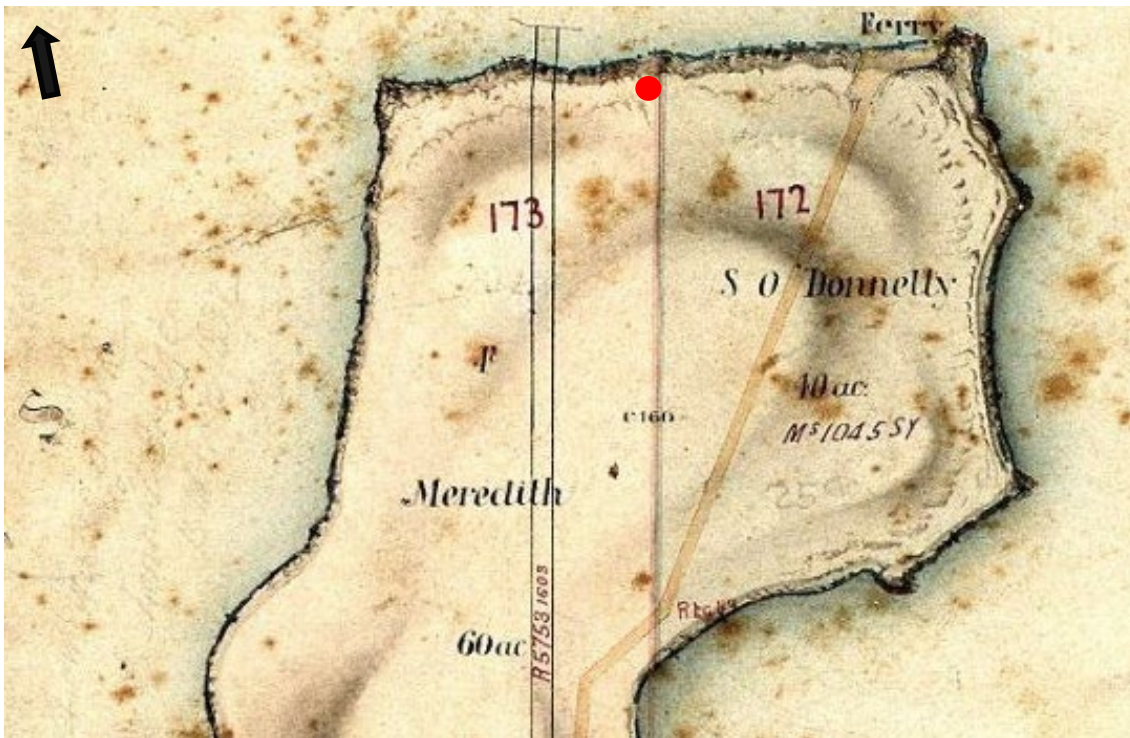


Figure 11 – Extract of a map from 1896 showing the subject area with the Meredith land grant. The railway line is shown running north across the Rhodes peninsula.

Source: HLRV, County of Cumberland, Parish of Concord

3.1.2. Phase 2 – First Subdivisions and Timberyard (1895-1955)

The subject area was subdivided by the end of the 19th Century along with the majority of the Rhodes peninsula (Figure 12). The subdivision of the site into smaller allotments as part of the Rhodes and Llewellyn Estates indicates that it may have been intended to be sold as residential land. The subject area was also located within proximity of the site of the government punt. Another subdivision from 1910 locates the site within DP 5923 Section 1-2 on the north side of Llewellyn Street (Figure 13). The street the subject area was located on was known as Llewellyn Street until approximately 1915 as shown in Figure 14.

In the early 20th Century, the Rhodes peninsular expanded industrial development as many factories were constructed in the local area. The NSW State Sawmill, CSR, Phillips, Allied Feeds and Tulloch's Phoenix were amongst those within the vicinity of the subject area. Rhodes was purchased for chemical manufacturing by CSR in 1930. Major industrial plants operated in the area and as a result the land was heavily contaminated.³

In 1922, the subject area was leased by the Sydney Harbour Trust to the Minister of Public Works (Figure 15). While the location of the subject area is missing from the 1922 cartographic map, it appears to have been located within a timber yard. The site is noted as being leased by Sydney Harbour Trust to Minister for Public Works for a term of 10 years from 1st April 1922. A crane is shown in the vicinity of the subject area which may have been used for reclamation works.

³ Wayne, Michael. 2013, Past/ Lives Flashback #1 Union Carbide – Rhodes, NSW, <https://pastlivesofthenearfuture.com/tag/rhodes/>

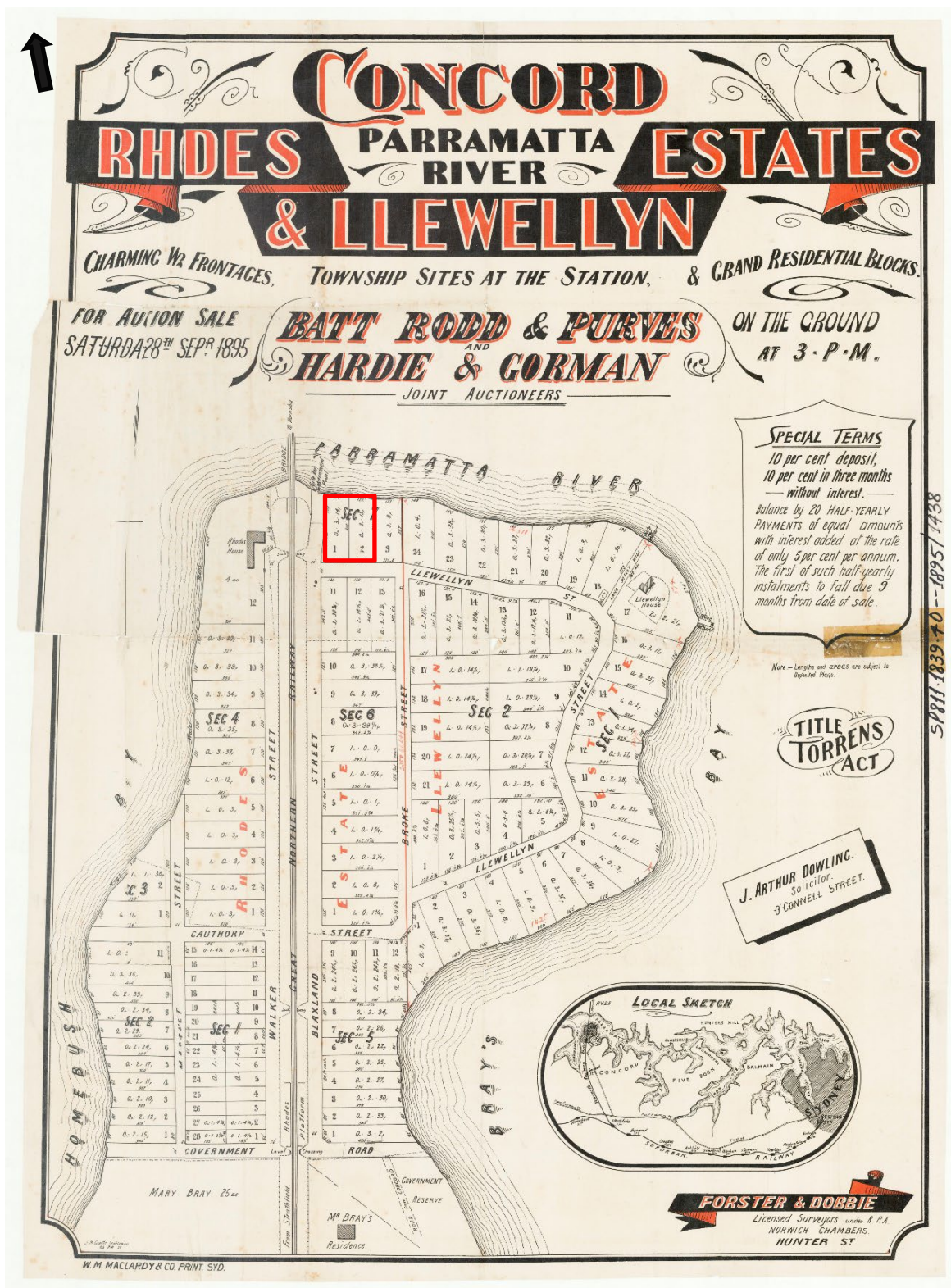


Figure 12 – Extract of North Strathfield, Concord West and Rhodes subdivision plans [1895]

Source: SLNSW, Call number: Z/SP/811.1839

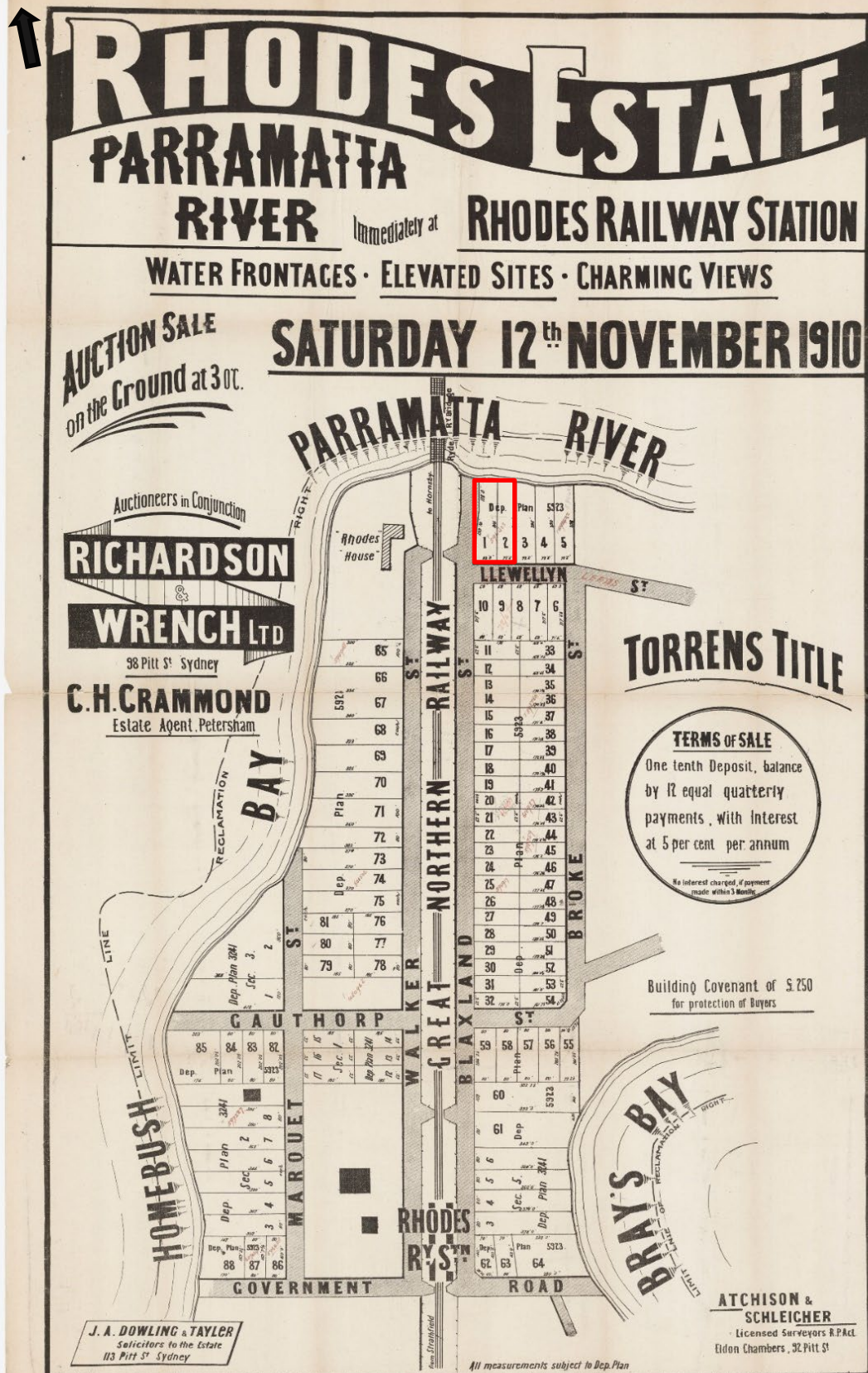


Figure 13 – Subdivision map of the Rhodes Estate [1910] showing the subject area within DP 5923 Sections 1-2 on Llewellyn Street.

Source: SLNSW, Call Number: Z/SP/811.1839

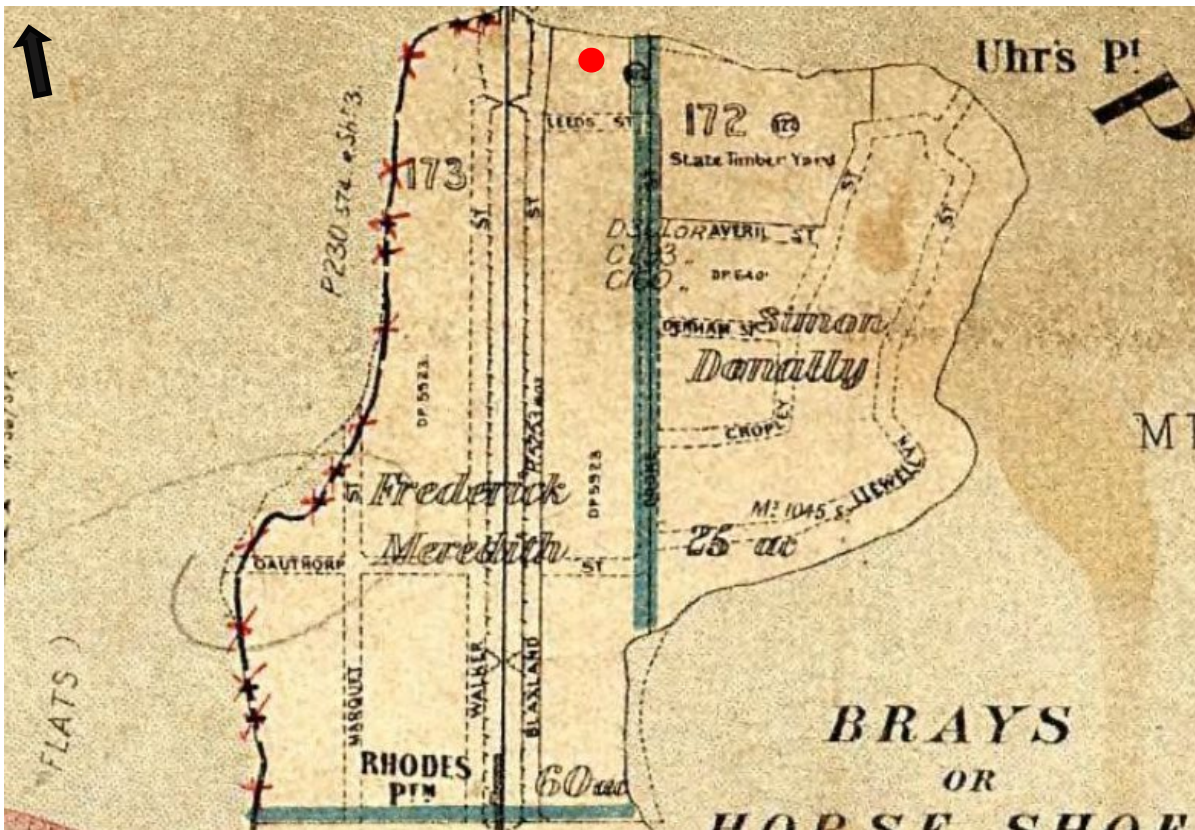


Figure 14 – Extract of 1914 map showing the subdivision of the Rhodes area.

Source: HLRV, County of Cumberland, Parish of Concord

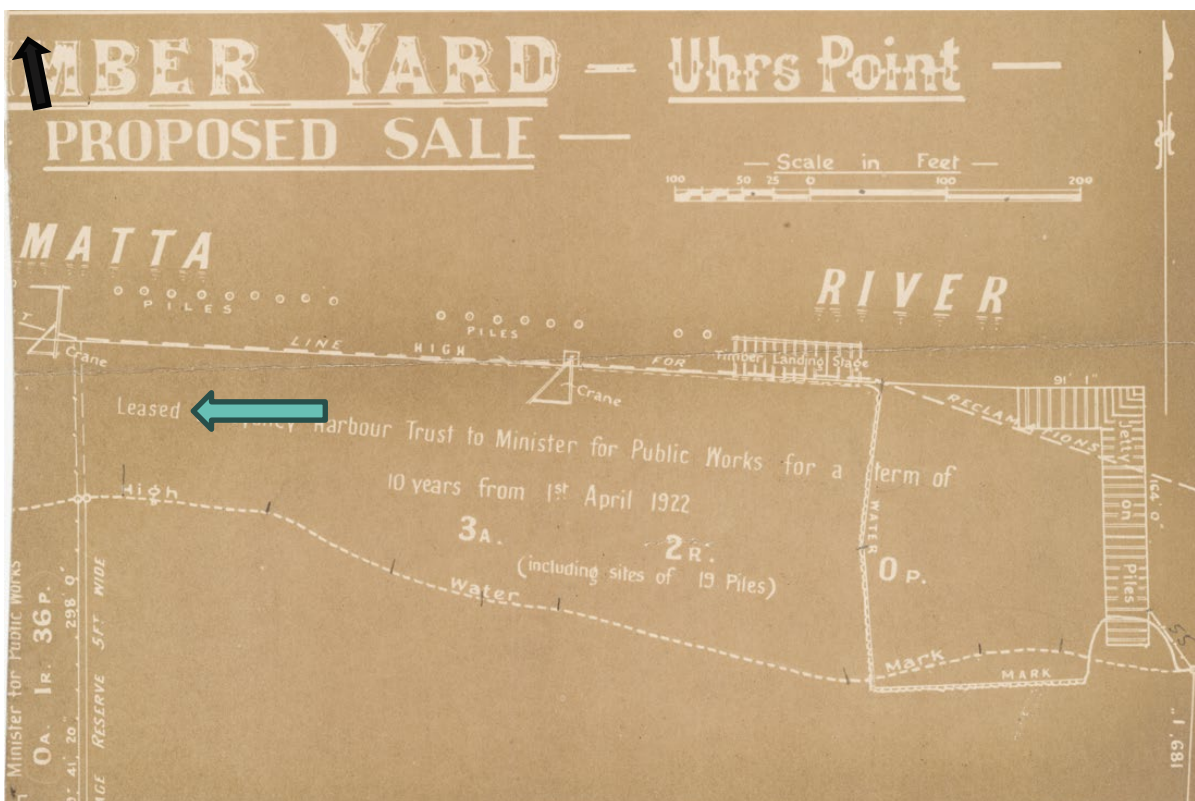


Figure 15 – 1922 cartographic map of the subject area as located within a timber yard leased to the Minister for Public Works. Location of subject area indicated by green arrow.

Source: Call Numbers: Z/SP/811.1839 , SP/811.1839

3.1.3. Phase 3 – Industrial Depot (1955-1986)

Following the use of the subject area for a timber yard, it was utilised for industrial purposes and became known as the 'Leeds Street Industrial Precinct'.

Photographs of the site from c.1950s show the subject area within an area of vegetation with no major development present (Figure 17). A pool is shown located off the shoreline of the subject area. It may have been associated within the timberyard during this period.

As shown in the aerial image from 1955 below, the subject area was utilised as an industrial goods depot (Figure 16). Minor earthworks are evident within the curtilage of the subject area although it is unclear whether the area was being used for storage or whether it was mid-way through construction. By this year the reclamation works had expanded the boundary of the shoreline.

In the next decade or so, the subject area continued to be used for industrial and storage purposes (Figure 18). No major changes are evident, however additional industrial materials are present in the northern portion of the subject area due to reclamation works.



Figure 16 – 1955 aerial photograph of the subject area evidencing use of the site as an industrial goods depot.

Source: NSW Government, Historical Imagery



Figure 17 – [Item 32: Milton Kent aerial views of Bankstown, Blacktown, Manly, Rhodes, 1956] View of the subject area containing timber and cleared land.

Source: SLNSW, Call numbers: ON 447/Box 124



Figure 18 – 1965 aerial photograph of the subject area evidencing the continuation of the site as a industrial storage depot.

Source: NSW Government, Historical Imagery

3.1.4. Phase 4 – Warehouse Facility (1986-present)

By 1986, the subject area been redeveloped into a warehouse development (Figure 19). The development covered the majority of the subject area, with the remaining area being sparsely populated with vegetation. Surrounding developments to the east were also being used for similar purposes.

From 1986 to 1991, no major change was evident (Figure 20). A photograph taken from the viewpoint of the Parramatta River shows the northern facade of the warehouse facility and evidence of the modification of the riverbanks (Figure 21).

The warehouse development is still extant within the subject area in the present day.



Figure 19 – 1986 aerial photograph of the subject area showing the establishment of a warehouse facility.

Source: NSW Government, Historical Imagery



Figure 20 – 1991 aerial photograph showing the use of the subject area as a warehouse facility.

Source: NSW Government, Historical Imagery



Figure 21 – Photograph of the subject area in 1991 from the Parramatta River demonstrating the extant warehouse facility. Source: City of Canada Bay Local Studies Collection

3.2. HISTORICAL DISTURBANCE

During Phase 1, the site was located within an early colonial land grant. The main activities that occurred during this time consisted of land clearance, small scale farming and grazing of animals. There was low historical ground disturbance during this phase.

In Phase 2, the site was subdivided as part of the Rhodes Estate. The site was potentially utilised for timber resources during this phase. The shoreline of the subject area contained a pool that may have been used for industrial purposes. The main activity that occurred during this phase was timber getting. On this basis, it is assessed there was low historical ground disturbance during this phase.

In Phase 3, the subject area was utilised as an industrial storage depot. The main activities that occurred in this phase were minor earthworks and general industrial activity. A high level of ground disturbance is assessed as occurring during this phase.

In Phase 4, the subject area was redeveloped into a warehouse facility. Historical ground disturbance during this phase of the site's history included; levelling and landscaping of the site, construction of the building. There is high ground disturbance assessed as occurring during this phase which is likely to have removed evidence of earlier phases of occupation.

3.3. PREVIOUS ARCHAEOLOGICAL INVESTIGATIONS

Previous archaeological investigations may provide information on the potential nature and distribution of archaeological resources in a given area. A number of archaeological reports relating either directly to the subject area of the immediate surrounds have been produced and are briefly discussed below.

3.3.1. Investigations of Subject Area

No previous archaeological reports relating directly to the subject area have been identified.

3.3.2. Investigations of Surrounding Area

Urbis and Lantern Heritage (2021) conducted an archaeological investigation of Concord Oval which is located approximately 4km away from the present subject area.⁴ The investigation consisted of open area

⁴ Urbis, 2021, Redevelopment of Concord Oval Post Excavation Historical S140 report (Unpublished)

excavation of the historical resources. The excavation identified that the site had undergone seven phases of historical use since circa 1807.

Desktop archaeological investigation identified that some areas of the site had undergone less historical ground disturbance (i.e. land clearance/levelling, excavation of natural soils and placement of fill for the construction of St Luke's Park and Concord Oval) and therefore had the potential to retain intact archaeological deposits. The potential for archaeological resources associated with the early history of the site was therefore assessed as high.

The excavation identified archaeological resources associated with Longbottom Farm (1819-1838), Longbottom Stockade (1838-1862) and the Mounted Police Stables (1862-1879). Archaeological features found at the subject area included building features, post holes, plough lines, rubbish pits, box drains, and a high number of general discard items.

The results of the excavation at Concord Oval indicate that historical disturbance at a site does not always remove all potential for archaeological resources. However, it is likely that most archaeological resources at sites which have undergone historical disturbance will have been retained with low spatial integrity.

Curio Projects (2017) undertook an historical archaeological testing program at Putney, which is located approximately 1.3 km away from the subject area.⁵ The site was associated with James Squire and his 19th century occupation and brewing operations.

The excavation identified remnant footings of the 1860's homestead 'Marina' within the subject area as well as undocumented relics such as rubbish pits, wells and deep cut features. The archaeological resources identified were noted as being highly truncated and fragmentary in nature. No artefact deposits were found to be associated with the footings. The report concluded that the remains of the Brewery and Inn Complex were likely to have been removed as part of late historical disturbance and redevelopment of the site.

Wendy Thorp (1988) conducted an archaeological investigation of Tulloch's Phoenix Ironworks in 1988⁶. The site is located approximately 300 metres away from the subject area. The investigation consisted of a desktop assessment as well as monitoring and excavation at the site.

The desktop assessment identified two phases of historical occupation on the Tulloch's site. These included evidence of the Braygrove house occupation and industrial resources associated with Tulloch's Phoenix works. During the monitoring and excavation, no evidence of the industrial occupation of the site was identified. Archaeological remains that were identified included the remnant footings of the former Brangrove House. Most of the footings had been truncated and partially removed by the 1978 program of works. However, some footings had been retained due to the previous excavator only clearing to ground level and not undertaking substantial excavation.

3.3.2.1. Conclusions from Previous Investigations

Previous investigations at Concord Oval, James Squire Brewery, and Tulloch's Phoenix Ironworks suggest that historical disturbance at a site does not always remove all potential for historical archaeological resources. However, the nature of the archaeological remains at these sites, and the extent to which disturbance has occurred, differ significantly compared with the current subject area. Due to the level of historical disturbance, any archaeological resources on the subject area are likely to be of low integrity, if present at all.

⁵ Curio Projects, 2017, 20 Waterview Street Putney NSW – Historical Archaeological Test Excavation Report – Curio Projects Pty Ltd

⁶ Wendy Thorp, 1988, Tulloch's Phoenix Ironworks Rhodes, Archaeological Report.

3.4. GEOTECHNICAL AND CONTAMINATION INVESTIGATIONS

ADE Consulting Group undertook a geotechnical investigation for the subject area in February 2023.⁷ The investigation consisted of seven cored bore holes within the subject area.

Generally across the subject area, the results indicated the presence of a concrete pavement at an approximate thickness of 60 - 150mm. Beneath the concrete was a sandy fill layer overlying an alluvial silty clay and silty sand layer. The silty clay was overlying a weathered sandstone bedrock at depths of approximately 1m and 6.5m.

Due to the presence of the fill deposit, it is evident the ground surface of the subject area has been modified by ground disturbing activities associated with the construction of buildings and installation of services. Although there are natural soil deposits identified, it is likely these soils have been affected by the fluvial deposition processes and reclamation works due to the location on the bank of the Parramatta River.

ADE Consulting Group undertook a contamination investigation for the subject area in June 2023.⁸ The results of the report identified a number potential contamination sources including fill and hazardous materials, soil and waste materials, and other petrochemicals were noted as likely to be present.

⁷ ADE Consulting Group, Geotechnical Site Investigation Report, 25-27 Leeds Street, Rhodes, NSW 2138, Proposed Mixed Use Development, Prepared for Billbergia Pty Ltd

⁸ ADE Consulting Group, Detailed Site Investigation, 25-27 Leeds Street, Rhodes, NSW, Prepared for Billbergia Pty Ltd

3.5. SUMMARY

The archaeological context of the subject area is summarised as follows:

- The subject area remained vacant land until the mid-20th Century after which it was utilised for industrial purposes. This is expressed in four distinct phases of development.
- The subject area underwent a high level of historical disturbance associated with Phases 3 and 4.
- Previous archaeological investigations within proximity of the subject area suggest there is potential for in situ archaeological remains to have been retained. Any potential remains are likely to be truncated and of low integrity.
- The geotechnical investigation results indicated that the presence of a fill layer overlying silty clay deposit. Although there are natural soil deposits identified, it is likely these soils have been affected by the fluvial deposition processes and reclamation works.
- The contamination report identified a number potential contamination sources including fill and hazardous materials, soil and waste materials, and other petrochemicals were noted as likely to be present.

4. PRELIMINARY ASSESSMENT OF ARCHAEOLOGICAL POTENTIAL

4.1. FRAMEWORK FOR ASSESSMENT

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

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

The potential for archaeological relics to survive in a particular place is significantly affected by later activities that may have caused ground disturbance. These processes include the physical development of the site (for example, phases of building construction) and the activities that occurred there.

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

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

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

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

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

4.2. ASSESSMENT OF ARCHAEOLOGICAL POTENTIAL AND SIGNIFICANCE

In order to assess the archaeological potential of the subject area, the potential archaeological resources associated with each of the development phases discussed above are considered in light of the degree of ground disturbance caused by subsequent phases of development and the impact this is likely to have on natural soils.

Table 4 provides a preliminary assessment of historical archaeological potential in relation to the historical phases, as identified in Section 3.1.

Table 4 – Assessment of Archaeological Potential

| Phase | Potential Resource | Integrity | Potential | Potential Significance |
|--|---|--|-----------|---|
| Phase 1 Farmland within the Early Land Grants (1794-1895) | Archaeobotanical evidence of land clearing and agricultural activities, post holes from fencing, ephemeral evidence of early land grants. | <p>The subject area was located within the early land grant to Meredith in the late 18th Century and 19th Century (Figure 9). Early parish maps shown the subject area within an area of cleared land in proximity to paddock fencing (Figure 10). Early historical records indicate that the wider Concord area was utilised for farming purposes during this phase of the site's history. Potential resources from this period may have moderate significance due to the association of the subject area with the NSW theme of Pastoralism.</p> <p>Subsequent phases of historical disturbance at the subject area including construction and demolition of residential structures as well as potential levelling and landscaping may have impacted the potential for archaeological resources to be retained.</p> | Nil-Low | If potential archaeological resources should occur with high integrity, they may meet the threshold for local or State significance due to the association with the NSW theme of Pastoralism. |
| Phase 2 First Subdivisions and Timberyard (1895-1954) | General discard items associated with the use of the government punt and the timberyard, ancillary structures. | <p>The subject area was subdivided as part of the Rhodes Estate at the end of the 19th Century. Due to the location of the subject area next to the government timberyard, it is possible resources associated with the operations of the timberyard have been retained.</p> <p>However, due to the ephemeral nature of the potential archaeological resources, there is low potential for resources to have been retained. Subsequent phases of historical disturbance at the subject area may have affected the integrity of the resources and decreased the likelihood that they would be retained with integrity.</p> | Low | If potential archaeological resources should occur with high integrity, they may meet the threshold for local or State significance due to the association with the NSW theme of Industry |

| Phase | Potential Resource | Integrity | Potential | Potential Significance |
|--|---|--|--|------------------------|
| Phase 3 Industrial Depot (1955-1986) | General discard items of industrial materials, Structural remains associated with depot operations. | <p>The subject area was utilised in the mid to late 20th Century for industrial purposes. The site underwent a high level of disturbance including; levelling, landscaping and earthworks. A number of ancillary industrial buildings were constructed within the subject area with the main purpose for use as a storage facility.</p> <p>The disturbance associated with the redevelopment of the site in Phase 4 is likely to have impacted the integrity of any industrial materials that may have been retained.</p> | Moderate | None identified |
| Phase 4 Warehouse Facility (1986-present) | None identified. | The subject area was redeveloped in 1986 for a warehouse facility. The subject area underwent a high level of disturbance during this phase; including levelling, landscaping, and construction of the building. This disturbance would have impacted the integrity of any archaeological resources from previous phases of the site's history. | 1986 warehouse facility: High (extant) | None identified |

4.3. SUMMARY

A summary of the above archaeological potential assessment is provided below:

- There is **nil-low potential** for archaeological resources (of local or State significance) associated with *Phase 1 – Farmland within the Early Land Grants (1794-1895)* due to the ephemeral nature of the potential resource and degree of subsequent disturbance.
- There is **low potential** for archaeological resources associated with *Phase 2 – First Subdivisions and Timberyard (1895-1954)* due to the absence of substantial structures and degree of subsequent disturbance. These are unlikely to meet the threshold for either local or state significance.
- There is **moderate potential** for resources associated with *Phase 3 – Industrial Depot (1955-1986)* due to the high historical land use during this period. These are unlikely to meet the threshold for either local or state significance.
- There is **no archaeological potential** identified for *Phase 4 – Warehouse Facility (1986-present)*.

5. CONCLUSIONS & RECOMMENDATIONS

Archaeological Potential

This PHAA has established the following in relation to the archaeological potential of the subject area:

- There is **low potential** for archaeological resources (of local or State significance) associated with *Phase 1 – Farmland within the Early Land Grants (1794-1895)* due to the ephemeral nature of the potential resource and degree of subsequent disturbance.
- There is **low potential** for archaeological resources associated with *Phase 2 – First Subdivisions and Timberyard (1895-1955)* due to the absence of substantial structures and degree of subsequent disturbance. These are unlikely to meet the threshold for either local or state significance.
- There is **moderate potential** for resources associated with *Phase 3 – Industrial Depot (1955-1986)* due to the high historical land use during this period. These are unlikely to meet the threshold for either local or state significance.
- There is **no archaeological potential** identified for *Phase 4 – Warehouse Facility (1986-present)*.

Due to the low archaeological potential across the site for all identified phases, it is unlikely that any proposed works will impact archaeological relics.

In light of the above findings, Urbis makes the following recommendations.

Recommendation 1 – Submission of Report for SSD- 67419241

This Preliminary Historical Archaeological Assessment should be submitted with the EIS for SSD-67419241 as a record of the assessment that has been undertaken to fulfil Item 19 of the SEARs. In the case of this project, it is assessed that impacts to historical archaeological relics as a result of the proposed development are unlikely.

Recommendation 2 – Avoid impacts outside assessed area

Proposed works must avoid any impacts (or potential impacts) to the riverside adjacent to the subject area. The Parramatta River shore may contain submerged archaeological remains associated with the former industrial use of the land, and this has not been assessed as part of this report. In the event that access associated with the project is required via water for any reason, further assessment will be required.

Recommendation 3 – Unexpected Finds and Human Remains Procedure

Although the likelihood of the subject area retaining any historical relics is low, it is recommended that unexpected finds and human remains procedures be implemented as harm mitigation measures.

If any archaeological deposits or features are unexpectedly discovered during any site works, the following steps must be carried out:

1. All works within the vicinity of the find must immediately stop. The find must not be moved 'out of the way' without assessment. The find must be cordoned-off and signage installed to avoid accidental impact.
2. The site supervisor or another nominated site representative must contact either the project archaeologist (if relevant) or Heritage NSW (Enviroline 131 555) to contact a suitably qualified archaeologist.
3. The nominated archaeologist must examine the find, provide a preliminary assessment of significance, record the item and decide on appropriate management measures. Such management may require further consultation with Heritage NSW, preparation of a research design and archaeological investigation/salvage methodology and notification of the discovery of a relic to Heritage NSW in accordance with S.146 of the Heritage Act 1977.
4. Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required and further archaeological investigation undertaken.
5. Reporting may need to be prepared regarding the find and approved management strategies.
6. Works in the vicinity of the find would only recommence upon receipt of approval from Heritage NSW.

Should clearly identifiable human remains be uncovered anywhere within the subject area, the following procedure should be implemented:

1. All works within the vicinity of the find must immediately stop. The find must be cordoned-off and signage installed to avoid accidental impact.
2. The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW (Enviroline 131 555).
3. The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.
4. Management recommendations are to be formulated by the NSW Police, Heritage NSW and site representatives.
5. Works are not to recommence until the find has been appropriately managed.

In the event that bones are uncovered which may be human but cannot be confirmed by onsite staff, a suitably qualified archaeologist or heritage specialist should be contacted in the first instance to determine how to proceed.

6. REFERENCES

ADE Consulting Group, Detailed Site Investigation, 25-27 Leeds Street, Rhodes, NSW, Prepared for Billbergia Pty Ltd

ADE Consulting Group, Geotechnical Site Investigation Report, 25-27 Leeds Street, Rhodes, NSW 2138, Proposed Mixed Use Development, Prepared for Billbergia Pty Ltd

Archaeological Assessments (Heritage Office and Department of Urban Affairs and Planning, 1996).

Assessing Significance for Historical Archaeological Sites and 'Relics' (Heritage Branch of the Department of Planning, 2009).

Canada Bay Local Environment Plan 2013

Curio Projects, 2017, 20 Waterview Street Putney NSW – Historical Archaeological Test Excavation Report – Curio Projects Pty Ltd

Environment Protection and Biodiversity Conservation Act 1999.

Historical Archaeology Code of Practice (Heritage Office of the Department of Planning, 2006).

McAulay, 'Walker, Thomas (1791–1861)', Australian Dictionary of Biography, National Centre of Biography, Australian National University, <https://adb.anu.edu.au/biography/walker-thomas-2766/text3927>, published first in hardcopy 1967, accessed online 26 March 2024.

NSW Heritage Act 1977.

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

Royal Australian Historical Society. 1918, *Journal and proceedings*, The Society, Sydney, viewed 18 March 2024 <http://nla.gov.au/nla.obj-594389496>

Urbis, 2021, Redevelopment of Concord Oval Post Excavation Historical S140 report (Unpublished).

Wayne, Michael. 2013, Past/ Lives Flashback #1 Union Carbide – Rhodes, NSW, <https://pastlivesofthenearfuture.com/tag/rhodes/>

Wendy Thorp, 1988, Tulloch's Phoenix Ironworks Rhodes, Archaeological Report.

DISCLAIMER

This report is dated 14 June 2024 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Billbergia Pty Ltd (**Instructing Party**) for the purpose of a Preliminary Historical Archaeological Assessment (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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

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

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

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

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

