

6 August 2018

The Minister for Planning

NSW Government, Department of Planning and Environment

320 Pitt Street

Sydney NSW 2000

**Re: Archaeological Impact Statement—Education Building, Sandstone Precinct, 35–39 Bridge St, Sydney, Section 4.55 Application to Modify SSD7484**

Dear Sir,

This letter report has been prepared to accompany a S4.55 Modification Application, for the Department of Education Building, located within the 'Sandstone Precinct', 35–39 Bridge Street, Sydney, and assesses the proposed modifications with regards to potential archaeological impacts.

The S4.55 Modification Application is being submitted following approval of State Significant Development (SSD) Stage 2 Application Number SSD 7484, for the adaptive reuse of the Lands Building, located at 23-33 Bridge Street, Sydney, and the Education Building, located at 35-39 Bridge Street, Sydney as hotel facility.

The proposed modifications include demolition and excavation modifications. With respect to archaeology, the main consideration for this modification is the reduction of the proposed basement area within the Education Building.

The proposed basement modifications have been identified as being required due to: further progression of the development design since approval of SSD 7484; in light of structural considerations for the Education Building (as determined by TTW Structural Engineers); and to improve on-site access during the construction phases.

## Site Identification

The Department of Education Building is located within 'The Sandstone Precinct' at 35-39 Bridge Street, Sydney (Lot 56 DP 729620), located in the northern end of the Sydney Central Business District (CBD) (Figure 1). The site is located adjacent to the former First Government House Site (now Museum of Sydney) and is within close walking distance to Circular Quay, the Royal Botanic Gardens, the NSW State Library, Sydney Opera House, The Rocks and Martin Place.



FIGURE 1: EDUCATION BUILDING IN ITS IMMEDIATE LOCAL CONTEXT (SOURCE: CURIO 2018)

## Statutory Context

Stage 2 of the Sandstone Precinct redevelopment project (Lands and Education Buildings) was approved on 24 April 2018 as a State Significant Development (SSD 7484), under Part 4, Division 4.1 the Environmental Planning and Assessment Act 1979 (EP&A Act). The SSD provides ‘Stage 2 development consent for the adaptive reuse of the Sandstone Precinct for tourist and visitor accommodation’.

The Education Building is listed on the NSW State Heritage Register in accordance with the NSW Heritage Act 1977 (SHR No. 00726).

Of relevance to the investigation of historical and Aboriginal archaeology for a development, the requirements for a S60 Excavation Permit under the provisions of the *NSW Heritage Act* (1977), or an Aboriginal Heritage Impact Permit (AHIP) in accordance with Section 90 of the *NSW National Parks and Wildlife Act 1974*, are removed for SSD projects (EP&A Act, Section 89J).

While a Section 60 Excavation Permit and AHIP are no longer required for the site, best practice heritage guidelines (regards both historical and Aboriginal archaeology, and overall management of heritage sites in NSW) will still be adhered to for this project, including statutory and non-statutory guidelines.

## Limitations and Constraints

This report refers only to the archaeological impact assessment of the proposed modifications to the Education Building under SSD7484. Built heritage considerations have been considered by Urbis in a separate Heritage Impact Statement.

This Archaeological Impact Statement report refers only to modifications proposed for the Education Building, and does not include assessment of any modifications within the Lands Building.

This report has been prepared with reference to the *Archaeological Assessment of the 'Sandstone Precinct'- Lands Building, Education Building, Road and Public Reserves at Gresham St, Loftus St and Farrer Place, Sydney* (Curio Projects 2016). The Archaeological Assessment report should be referred to for further archaeological information, should it be required.

## Archaeological Significance

The extant Lands and Education Buildings within the study area are physical representations of over 200 years of use of the study area as a centre for government focus, occupation and activity, form playing an integral part in the early administration of the colony from 1788-1810, continued administration from 1810-1876, through to use by important government departments such as Education, Agriculture and Lands.

*Three phases of historical use of the study area have been identified: Phase 1—Establishment of the Colony (1788-1810); Phase 2—Macquarie Era Buildings and road/sewer development (1810-1876); and Phase 3—Lands and Education Buildings (1876-Present). These three historical phases all have the potential to provide tangible physical evidence for the nature and location of early structures (currently unknown or unconfirmed), as well as cultural deposits which may have the ability to demonstrate and interpret the daily lives of early colonial officers and their families, the day to day workings of the administration of the early Sydney colony, as well as its progression through the history of the Sydney colony.*

*The potential archaeological structural remains, and cultural deposits from all three phases of occupation provide good opportunities for public interpretation to provide a tangible link between the current city of Sydney and its occupants, continuously back through to the original colonial settlement and functionality of the city.*

*While it is agreed that unstratified archaeological deposits are unlikely to be able to provide research value, information or a solid connection to the past, other potential*

*archaeological structures and stratified deposits from the three phases of use of the study area may be considered to be of **State Significance**.*<sup>1</sup>

## Archaeological Potential

With regards to archaeological potential, the Curio Projects 2016 *Archaeological Assessment*<sup>2</sup> concluded that:

- The subject site has the potential to contain **State significant archaeological relics** associated with all phases of development at the site, including archaeological relics associated with Phase 1- Establishment of the Colony (1788 – 1810), Phase 2 – Macquarie Era (1810-1876) and Phase 3 – Lands and Education Buildings (1876 – 1893).
- It is likely that the historical archaeological resource will have been subjected to various levels of disturbances across many areas of the site, with the more intact archaeological resources likely to remain in the northern sections of the site fronting Bridge Street.
- Should previously undisturbed relics associated with Phase 1 of the site's history – the establishment of the colony be found during the redevelopment of the site, they would likely be considered to be rare -depending on their extent, nature and level of intactness.
- Should intact archaeological resources associated with any of the three key phases of the site's history be found, they would contribute to our understanding of the site and should form the basis of a comprehensive interpretation strategy to be implemented on site.
- There is a low potential for intact Aboriginal archaeological deposits to be present within the subject site.

## Archaeological Recommendations

The *Archaeological Assessment* recommended that:

- While the discovery of an Aboriginal archaeological deposit is not expected within the subject site, in the unlikely event that natural soil profiles with the potential to retain Aboriginal archaeological deposits are encountered during site works, the document entitled 'Aboriginal Cultural Heritage Methodology and Methodology for Unexpected

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<sup>1</sup> Curio Projects, 2016., *Archaeological Assessment*: 66

<sup>2</sup> Curio Projects, 2016., *Archaeological Assessment*: 91

Aboriginal Archaeology' should be referred to for subsequent management and excavation methodologies.

- Prior to commencement of excavation on site, an Archaeological Research Design and Excavation Methodology will be required to be prepared and submitted to the NSW Heritage Division and DPE for approval.
- Due to the potential significance of the site, the archaeological investigation in areas proposed to be excavated, should be managed by an Excavation Director that meets the State Significant Excavation Director Criteria issued by the NSW Heritage Division.
- Should unexpected, potential historical archaeological 'relics', skeletal remains or Aboriginal objects be discovered during the works program, then works must cease in the immediate area and the project archaeologist contacted for advice.

## Proposed Modification Works

Since the approval of SSD7484, the overall footprint and design of the Education Building basement has been altered for the following reasons:

1. SSDA condition B5 (Design Modifications—Education Building), requires the retention of the 1915 north-western perimeter wall of the courtyard on Lower to Ground floors of the Education Building. The most effective way to achieve this from a structural point of view, is to step the basement excavation around the wall, thereby reducing the extent of basement excavation in this location.
  2. On-site geotechnical advice from TTW (structural engineers) recommended that excavation of some proposed areas of the basement within the Education Building should be avoided, due to the additional complications that would arise for new and existing support columns above.
  3. To improve on-site access during the construction phases, basement excavation areas near the Loftus St loading dock entry to the Education Building have been simplified.
- Archaeological Impact Assessment

The proposed reduction of the basement footprint area within the Education Building is presented in Figure 2.



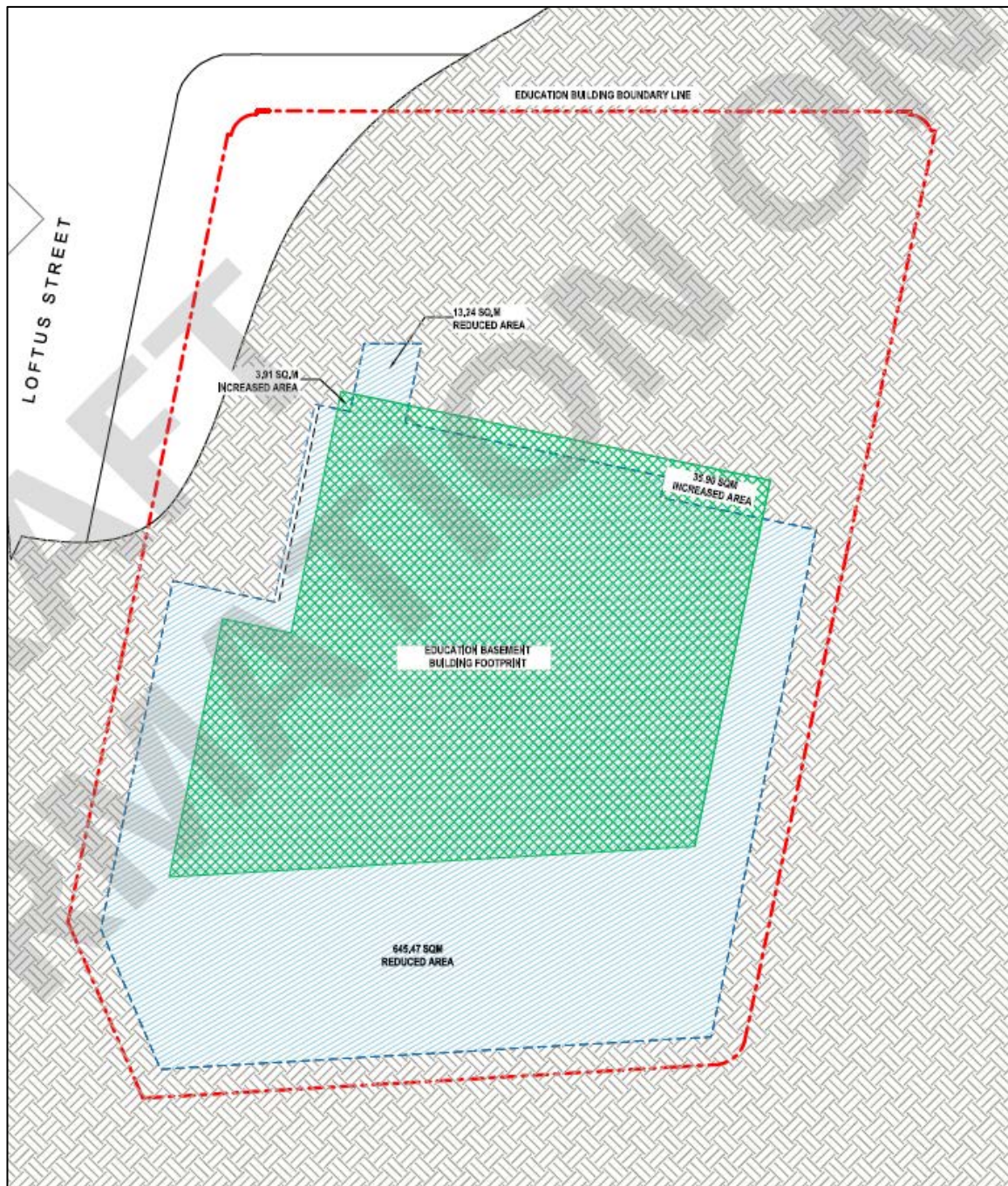


FIGURE 2: DEMOLITION OVERLAYED FLOORPLANS, EDUCATION BUILDING BASEMENT 1 (SOURCE: MAKE & RIDLEY 2018, DRAWING NO. SP-DA-G-2358)

## Archaeological Impact Statement

As identified within the *Archaeological* Assessment, any impact to the potential historical archaeological deposit under the Education Building would be within development excavation for Basement 1 of the Education Building, i.e. from commencement of ground disturbance, to approximately 4m below the current ground surface. This is in consideration of the depth of sandstone bedrock across the Education Building of c.595mm below ground level (within which the majority of potential archaeological resources would be present), also allowing for

potential deeper subsurface features such as wells, cisterns, rubbish dumps etc. Any deeper excavation proposed for the development will have little to no potential to encounter archaeological deposits as they are extremely unlikely to occur deeper than 4m below the current ground surface.

An Archaeological Research Design and Excavation Methodology (ARD + EM) is currently in preparation for the overall site (i.e. including both the Lands and Education Buildings), in accordance with SSD Consent Condition C23 'Historical and Aboriginal Archaeological Research Design and Excavation Methodology' that requires the preparation of a 'combined Historical and Aboriginal ARD... submitted for review and approval by the Heritage Council or its delegate, prior to the commencement of any ground disturbing works on site'.

The reduction and slight realignment of the Education basement 1 (as proposed through the S4.55 Modification), will have no additional impact to the historical archaeological potential of the subject site, as identified through the *Archaeological Assessment*, and will still require impact mitigation via archaeological excavation (as per the recommendations of the AA report).

Further, additional development impacts within the Education Building, outside of the footprint of the basement excavation, will also have the potential to impact the potential archaeological resource, and therefore a site wide archaeological approach has already been adopted through the preparation of the ARD.

## Conclusions and Recommendations

Overall, the proposed modifications, with respect to archaeology, are considered to have no additional adverse impact to the potential historical archaeological resource at the subject site, and will not alter the proposed archaeological mitigation measures required for the site from that proposed in the Curio Projects 2016 *Archaeological Assessment* report.

Therefore, with regards to the S4.55 Modification to SSD7484, with respect to archaeology, it is recommended that:

- The Archaeological Research Design and Excavation Methodology (ARD + EM) that is currently in preparation for the overall site, should make reference to the revised basement excavation area.
- The ARD + EM should be approved by the NSW Heritage Division via Department of Planning and Environment, prior to ground disturbing works taking place within the site.

- The recommendations and procedures detailed within the ARD + EM (once approved) should be adhered to and fulfilled, prior to commencement of basement excavation (and other ground disturbing works, as detailed within the ARD).

Therefore, the proposed s4.55 Modification should be supported on archaeological grounds, and will pose no additional impact to any potential archaeological resource at the site, than that already assessed for the original design as approved under SSD7484.

If you have any questions about this project, or require any additional information, please do not hesitate to contact me via email or phone on 0402 522 789.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Sam Cooling', with a stylized, flowing script.

Sam Cooling  
Senior Archaeologist  
Curio Projects Pty Ltd.