

Historical Archaeological Research Design and Excavation Methodology

*47–97 Marlborough Street, Surry
Hills*

April 2026

Prepared for: M. House Surry Pty Ltd

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Acknowledgment of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on. We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years. We pay our respects to First Nations Elders, past and present.

Urbis is committed to incorporating our respect for First Nations cultures, peoples and storytelling in our work across the Country. We are proud to have partnered with Darug Nation artist, **Hayley Pigram**, and to profile her artwork – **Sacred River Dreaming**.



The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

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.

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Introduction

1 Introduction

Urbis has been engaged by M. House Surry Pty Ltd ('the proponent') to prepare a Historical Archaeological Research Design and Excavation Methodology (HARDEM) of 47–97 Marlborough Street, Surry Hills, legally referred to as Lot 1 in DP225393 and Lot 1 in DP251056 ('the subject area').

This HARDEM forms part of the State Significant Development Application (SSDA) (SSD-78545225) to redevelop the subject area for an in-fill affordable housing redevelopment.

1.1 Background

Urbis prepared a Historical Archaeological Assessment (HAA) in March 2026 to support the State Significant Development Application (SSDA) (SSD-78545225). It also fulfilled the Secretary's Environmental Assessment Requirements (SEARs), dated 19 December 2024 for Item 22, Environmental Heritage which required a HAA:

22. Environmental Heritage	If required:
Where there is potential for direct or indirect impacts on environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (where required), in accordance with relevant guidelines.	Archaeological Assessment

The HAA (Urbis 2026) concluded that the subject area held moderate potential for locally significant relics which would be impacted by the proposed development and recommended that a HARDEM in accordance with Heritage NSW guidelines should be prepared prior to development to guide and mitigate those impacts with a program of archaeological investigation.

The subject area does not contain any State heritage items which are listed under the *Heritage Act 1977*. This HARDEM does not propose the removal of state significant relics should they exist at the site. If state significant relics are uncovered at the site, works will cease in this area and further liaison with Heritage NSW will be required.

1.2 Scope and Limitations

This HARDEM is tailored to the scope of the proposed works within the subject area, the significance of the potential archaeological resource and the requirements of the *Heritage Act 1977* (NSW).

This HARDEM accords with the following guidelines:

- Historical Archaeology Code of Practice* (Heritage Office of the Department of Planning 2006)
- Archaeological Assessment Guidelines* (Heritage Office, Department of Urban Affairs and Planning 1996)
- Assessing Significance for Historical Archaeological Sites and 'Relics'* (Heritage Branch of the Department of Planning 2009)
- Criteria for Assessing Excavation Directors* (Heritage Council of NSW 2019)

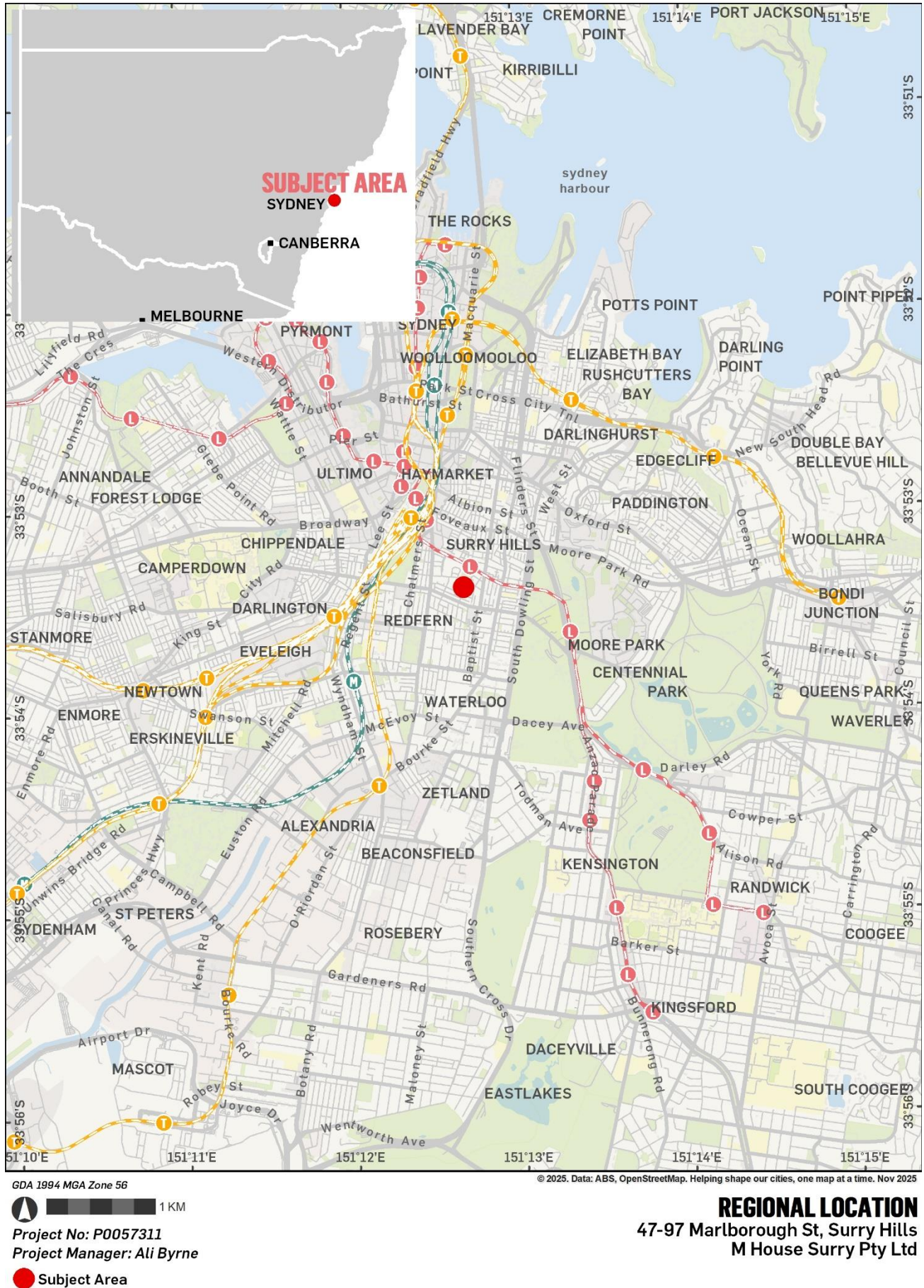


Figure 1 – Regional Location



GDA 1994 MGA Zone 56

© 2025. Data: ABS, OpenStreetMap, Nearmap. Helping shape our cities, one map at a time. Nov 2025



Project No: P0057311

Project Manager: Ali Byrne

Subject Area — Contours

LOCATION OF THE SUBJECT AREA
47-97 Marlborough St, Surry Hills
M House Surry Pty Ltd

Figure 2 – Subject area outlined in red.

1.3 Project History

This section provides a summary of the project history based on the findings of the HAA (2026). This should be read in conjunction with this HARDEM. It summarises the site's archaeological potential, assessed heritage significance, and the likely impacts on archaeological resources.

1.3.1 Summary of Archaeological Potential

The subject area has been divided into two zones with differing levels of disturbance and archaeological potential (see Figure 3):

- **Zone 1:** Low archaeological potential
- **Zone 2:** Moderate archaeological potential

In Zone 1, the site was disturbed by the construction of the David Jones warehouse in 1914 and its addition in 1935. In Zone 2, it is possible that construction of the single storey carpark building created less impacts than the factories in Zone 1. Archaeological remains may be more intact within Zone 2.

A number of different kinds of remains are expected within both zones, and their level of potential is based on the construction method of each feature. Multiple timber buildings are known to have once occupied Zone 1 and Zone 2. Based on the ephemeral nature of the remains usually associated with timber structures, there is low potential for truncated remains of these buildings to survive within the subject area.

Brick buildings also once occupied the site in both Zone 1 and Zone 2. Due to the more robust nature of brick foundations, these buildings have been assessed as having moderate archaeological potential.

The site holds unknown potential for undocumented remains, particularly related to Goodlet and Smith's use of the site in the mid to late 19th century.

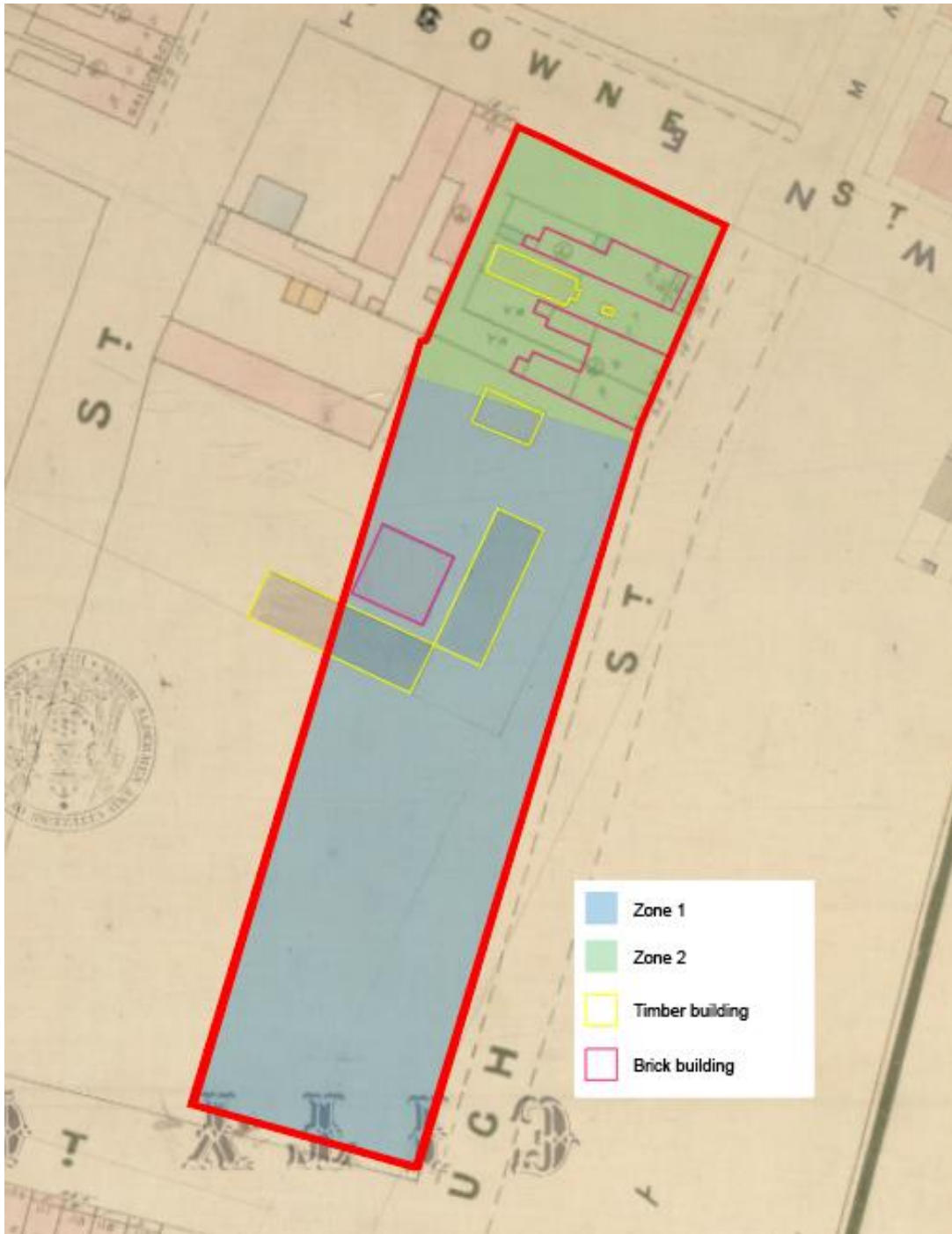


Figure 3 –Archaeological Potential Map. Zone 1 has low potential and Zone 2 has moderate potential.

Source: Urbis 2026.

1.3.2 Statement of Significance

The HAA (2026) concluded that the archaeological resources which may survive within the subject area are of local heritage significance.

Evidence associated with Phase 2 of the sites 19th century domestic and industrial occupation are considered of local significance under Criterion A (Historical Significance), Criterion E (Research Potential) and Criterion G (Representativeness). If identified, in situ or legible archaeological evidence associated with the residential use of the subject area has the capacity to provide valuable insights into the lives of 19th century working class families. Archaeological evidence of the sites industrial use in association with Goodlet and Smith has

the ability to supplement the historical record which is currently missing details on the specific function of the site within the pottery works complex.

1.3.3 Statement of Archaeological Heritage Impact

The proposed development includes deep excavation for a basement car park. The location of the car park is in the north of the subject site, in an area that has been identified as containing potentially locally significant relics (Zone 2). Excavation for the car park will wholesale remove any locally significant relics that are present in the area.

The southern portion of the site is occupied by the David Jones factory building (Zone 1). As this building is a heritage item, it will be retained and adapted as part of the development program. No subsurface impacts are proposed in Zone 1 and thus there will be no impacts to potential relics in this area.

To mitigate harm to locally significant relics in Zone 2, the HAA recommended that a HARDEM be prepared to guide a program of archaeological monitoring and salvage works.

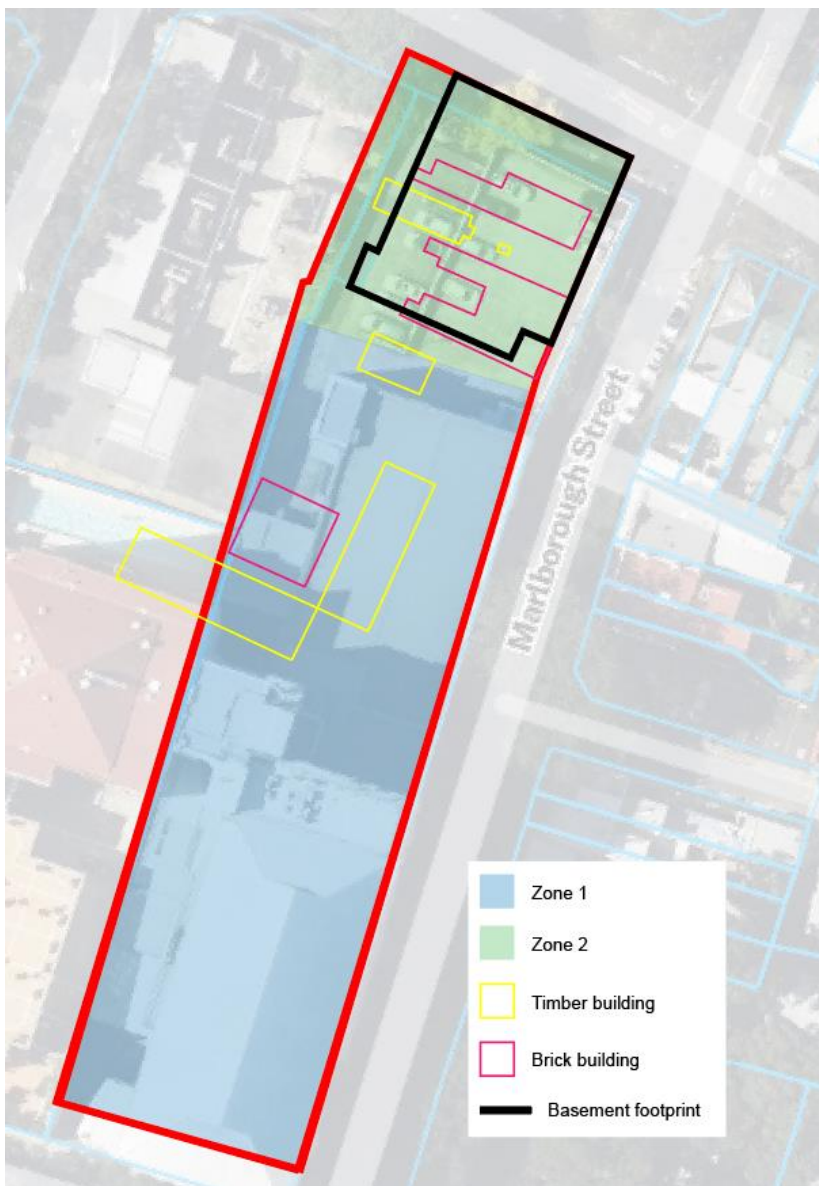


Figure 4 – Map of proposed impacts to areas of archaeological potential. Footprint of basement indicated by black line.

Source: Urbis 2026.

2

Archaeological Research Design

2 Archaeological Research Design

The proposed redevelopment of the subject area includes... Given these impacts, it is likely that the proposed works have the potential to expose archaeological relics of local significance, and a program of archaeological monitoring has therefore been proposed.

The following research design was developed based on the Heritage Council of NSW's historical themes and will guide the methodology for the proposed archaeological monitoring of the subject area.

2.1 NSW Historical Themes

The Heritage Council of NSW provides historical themes to consider the research values of heritage in New South Wales.¹ Historical themes relevant for the study site are presented in Table 1 below.

Table 1 – Historical Themes concerning the subject area

Australian Theme	NSW State Theme	Study Site
3 Developing local, regional and national economies	Commerce	Mid-late 19 th century evidence of Goodlet and Smith industrial operations.
8 Developing Australia's cultural life	Domestic life	Mid-late 19 th century evidence of former residential terraces.

2.2 Research Questions

The following research questions relate to the historical development and use of the site generally. They have been formulated based on the survival or evidence of relics on the subject area and informed by the archaeological monitoring and test excavation guidelines outlined in Section 139 of the *Heritage Act 1977*.

General Research Questions
What evidence is there of previously unknown features?
What archaeological evidence is there of the features which are known to have existed on the site?
How has the process of development affected earlier remains on the site?
How has the natural geology and topography of the site affected the survival of relics?
What was identified at the site? What kinds of features and deposits?
When were these features or deposits created? How are they phased against the site historical analysis?
What site formation processes have occurred?
What happened at the site?

¹ *Assessing Historical Importance, a Guide to State Heritage Register Criterion A*, Heritage Office, Department of Planning, 2006

General Research Questions

How does this site compare to others?

What contexts, phases, and activity areas are evident, and how are these demonstrated by the various excavation units (trench/square/context/feature)?

Where were the relics located?

Compare the results with other relevant sites, related projects, and current research; how does the project fit into broader, regional frameworks and theoretical models if they exist?

Indicate how and/or why the subject site differs from other sites.

The following research questions relate to the historical development and use of the site generally. They have been formulated in view of the themes discussed in the preceding Section.

NSW Theme: Commerce

Historical research has revealed that from c.1865 Goodlet and Smith established their pottery and brick works to the west of the subject area. Goodlet and Smith was a prominent 19th–20th century industrial company which started as a timber and glass merchant and later expanded into pottery, bricks and terracotta products.

Historical maps indicate that buildings associated with the pottery and brick-making operations were extant within the site as early as 1855 and certainly by 1865. The precise function of these buildings is unclear and the extent to which the site was utilised in association with the pottery and brick making operations remains unknown.

Research Questions

To what extent was the subject area incorporated into the Goodlet and Smith brick and pottery-making operations?

Is there any evidence of industrial infrastructure located within the subject site (e.g. kilns, presses, etc)?

To what extent does the archaeological record confirm the location of the two buildings depicted to the south of the terraces in the 1886 Metropolitan Detail Series Plan? Can we confirm if these buildings were associated with Goodlet and Smith's operations?

Although no ground disturbance is proposed within the vicinity of the buildings depicted in the 1865 Trigonometrical Survey Plan, is there any evidence which can confirm whether these reflect an earlier iteration of the Goodlet and Smith pottery and brick-making operations (which are known to have commenced in 1867)? If not, can it tell us anything about the use of the site at this time?

Should large concentrations of ceramic waste (e.g. grog, scraps or failed/ broken pieces) be encountered, is there any indication that there were changes in composition through time? Does this reveal anything about the sourcing of raw materials or changes in technology or output? Is there any evidence of saggars (broken pottery pieces) or grog being recycled?

NSW Theme: Domestic Life

By the mid-19th century, Surry Hills had transformed into a bustling residential neighbourhood, with a significant increase in housing stock and population. As part of this residential explosion, a number of terraces were constructed within the northern portion of the subject area in the mid-late 19th century.

Over subsequent decades the fortunes of the Surry Hills area took a downward turn and by the early 20th century it had come to be considered a slum, plagued by poverty, crime, and inadequate infrastructure. The former terrace dwellings therefore derive from an important transitional period in the residential history of Surry Hills and may be able to shed light on the domestic lives of those living through it.

Research Questions

Were any occupation deposits (e.g. artefact scatters, yard deposits, rubbish pits) found which can be linked to any specific occupants of the terraces?

Are there any intact deep features (e.g. wells, cesspits, etc) associated with the occupation of the terraces? Can their contents reveal anything about the daily lives and practices of the inhabitants? Can they be meaningfully compared with examples from contemporary sites in the Surry Hills area?

Can surviving structural remains tell us anything about the layout of the former terraces? Do these accord with contemporary examples from the Surry Hills area?

To what extent do structural remains align with the mapped configuration of the terraces as depicted in the 1886 Metropolitan Detail Series Plan and the 1888 Rygate and West Plan? Can we determine anything about the purpose of these buildings?

Is there any evidence of a progressive decline in living standards, which may have been affected by the socio-economic downturn of the Surry Hills area between the mid-19th – early 20th centuries?

3

Excavation Methodology

3 Excavation Methodology

This section provides a site-specific excavation methodology to gather information from targeted archaeological investigation to respond to the Research Design and gain a more informed understanding of the archaeological resource that survives on site.

3.1 Approval Pathway

This HARDEM forms part of a State Significant Development Application (SSDA) (SSD-78545225) to redevelop the subject area for an in-fill affordable housing redevelopment.

Urbis prepared a Historical Archaeological Assessment (HAA) in March 2026 to support the SSDA and to address item 22 of the SEARs (dated 19 December 2024). It also fulfilled the Secretary's Environmental Assessment Requirements (SEARs), dated 19 December 2024 for Item 22, Environmental Heritage which required a HAA. The HAA concluded that the subject area held moderate potential for locally significant relics which would be impacted by the proposed development and recommended the preparation of an Archaeological Research Design and Excavation Methodology (HARDEM) prior to development to mitigate these impacts.

This HARDEM has therefore been prepared to accompany the HAA in support of the SSDA (SSD-78545225). These reports will need to be submitted as part of the SSDA and endorsed by Heritage NSW, through the NSW Department of Planning, Housing and Infrastructure. It is recommended that an Excavation Director is nominated to oversee any proposed excavation or salvage program prior to works.

3.2 Justification of Proposed Monitoring Program

The following excavation methodology has been tailored to respond to the findings of the HAA (Urbis 2026), which identified the following two zones within the subject area (Figure 5):

- **Zone 1 (Blue):** Unexpected Finds Procedure
- **Zone 2 (Green):** Archaeological Inspection and Monitoring and Salvage (if required)

The following excavation methodology is proposed to occur in stages:

- Stage 1: Heritage Induction (Section 3.5)
- Stage 2: Archaeological Inspection (Zone 2) (Section 3.6)
- Stage 3: Monitoring and Salvage, if required (Zone 2) (Section 3.7)
- Stage 4: Unexpected Finds Procedure (Zone 1-2) (Section 3.8)
- Stage 5: Archaeological Reporting (Section 3.9)

A staged archaeological program is required due to the archaeological sensitivity of the subject area. The HAA (Urbis 2026) established that within Zone 2, there is moderate potential for locally significant relics to be present, that will be wholesale removed as part of the excavation for the basement car park. To mitigate a negative heritage impact to the archaeological resource, a staged program will be implemented.

This will initially begin with Stage 1: Heritage Induction prior to the commencement of any archaeological field program. The field program will commence, with Stage 2: Archaeological Inspection of the ground surface during the demolition of the existing carpark across the northern portion of the subject area (Zone 2). Stage 3: Archaeological Monitoring and Salvage (if required) will commence during bulk excavation for the basement and excavation works outside of the basement footprint. Stage 4: An Unexpected Finds Procedure which is a call-out-system that will be maintained for the duration of the development. This UPF will apply not only to areas of Zone 2 that have been signed off during archaeological monitoring and (if necessary) salvage, but also within Zone 1. While Zone 1 has low potential for archaeological remains and no impacts are anticipated, the procedure recognises the possibility of deeper, previously undocumented features.

Following the completion of the archaeological program, preparation and completion of a Final Archaeological Report providing the results of the archaeological fieldwork will be undertaken. Reporting is required under Section 146 of the *Heritage Act 1977*.

Although state-significant relics are not anticipated, if such archaeology is uncovered at any stage of the archaeological program, excavation in that area will cease while the remains are investigated. Heritage NSW will be consulted to determine appropriate management measures for any state-significant archaeology identified.

This site-specific methodology is designed to address the archaeological research questions outlined in Section 2.2. All monitoring will follow current best practices and the methodology as outlined in Sections 3.5–3.9.

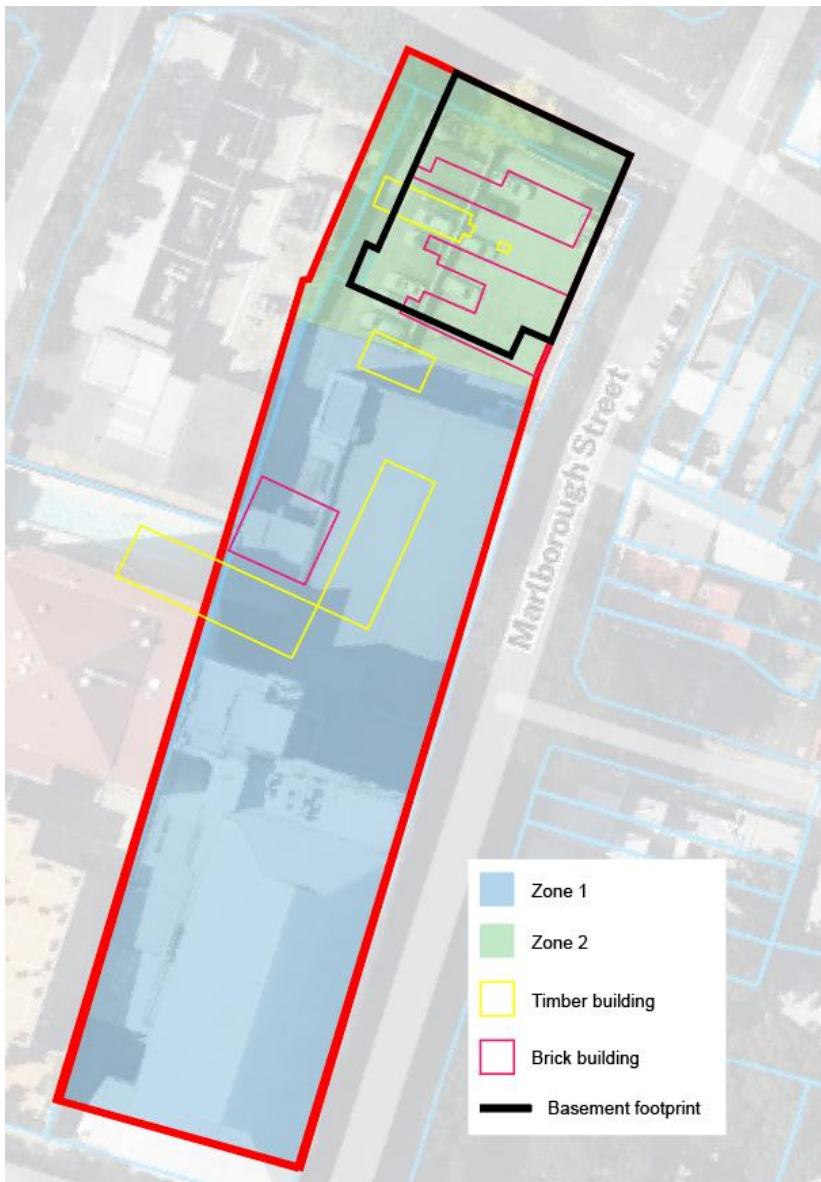


Figure 5 – Archaeological Zones. Zone 1: *Unexpected Finds Procedure*; Zone 2: *Archaeological Inspection, Monitoring and Salvage (if required)*.

Source: Urbis 2026.

3.3 Program Commencement

The archaeological program is proposed to be implemented at the commencement of Stage 2: Archaeological Inspection of the ground surface during the demolition of the existing carpark surface across the northern portion of the subject area (Zone 2). This is to determine the extent of Stage 2: Archaeological Monitoring and Salvage (if required).

3.4 Archaeological Team

The excavation must be guided by a suitably qualified Excavation Director that meets the 2009 Heritage Council of NSW Criteria for Assessing Excavation Directors. The nominated archaeological team for the archaeological program may include:

- Primary Excavation Director (Jaki Kennedy or Kelly Strickland)
- Secondary Excavation Director (Emma William or John Sokalik)
- Senior Archaeologist (Owen Barrett, Francesca McMasters, Prue Newton, Alexandra Ribeny)
- Archaeologists (Emma Williams, Pedro Silva, Natalie Taylor, Kirsten Downey, Juliet Scholefield, Jordan Gilbert)

3.5 Stage 1: Heritage Induction

Prior to the commencement of any archaeological field program, a heritage induction would be delivered by the nominated Excavation Director to all relevant construction personnel for the purpose of establishing:

- Heritage obligations of all project personnel.
- Why the subject site is archaeologically significant and how it is protected under legislation.
- What kind of relics may occur within the subject site and where.
- What the current archaeological program is seeking to undertake (e.g. monitoring, salvage) and how that fits into any other site activities presently being undertaken.
- How to work with monitoring or supervising archaeologists, including any stop works procedures for archaeological finds.

Heritage induction material should be provided to all site personnel as part of the induction. Induction materials can include copies of the archaeological reports, approvals, Safe Work Method Statements (SWMS).

3.6 Stage 2: Archaeological Inspection (Zone 2)

Archaeological inspection is the initial phase of archaeological field work management and occurs once a development site is prepared for excavation. An archaeological inspection will be undertaken during the demolition of the existing carpark surface in the northern part of the site within Zone 2 of the subject area. This inspection will identify the presence of any visible archaeological features and determine the extent of archaeological monitoring that will be required.

During the inspection, the archaeologist assesses the exposed soils for signs of archaeologically sensitive stratigraphy or undocumented features. If any archaeological materials or features are identified, all excavation activity must cease immediately, and the area will be subject to manual archaeological investigation per the Standard Excavation Practices detailed in Section 3.10.

If the archaeologist determines that the inspected area is either heavily disturbed or comprises natural, undeveloped ground, or sandstone bedrock, the area may be cleared for continuation of development works and will proceed to Stage 4 – Unexpected Finds Procedure. Clearance will only proceed following formal approval and sign-off by the nominated excavation director.

3.7 Stage 3: Monitoring and Salvage (Zone 2)

As there is moderate potential for local significant relics to survive in the northern part of the site within Zone 2 of the subject area, archaeological monitoring and salvage (if required) will commence during bulk excavation for the basement carpark and construction works outside of the basement footprint. All archaeological monitoring and recording of relics will be undertaken in accordance with the Standard Excavation Practices detailed in Section 3.10. If during archaeological monitoring, the qualified archaeologist determines that the area is disturbed or no archaeological remains are present, the area may be cleared for continuation of development works and managed under Stage 4- Unexpected Finds Procedure.

Monitoring involves a suitably qualified archaeologists working alongside an experienced mechanical excavator driver (potentially manual excavation at this site) and directing the location, depth and method of excavation. Any machines must be of an appropriate size to the task, work backwards from hardstand or areas of no archaeological potential so as not to disturb any exposed archaeology, have rubber tracks, use a mud bucket, and remove one stratigraphic layer at a time as defined by the archaeologist (see Section 3.10.2).

While unexpected, should potential state significant archaeology be exposed at any point during the archaeological program, excavation works will cease in that location while the remains are investigated. Heritage NSW will be consulted to determine appropriate management measures for any state-significant archaeology identified.

3.8 Stage 4: Unexpected Finds Procedure (Zone 1 & 2)

Zone 1 – correlates to the southern portion of the subject area (Figure 5) where the HAA (Urbis 2026) identified low potential for archaeological relics and no subsurface impacts are proposed. Archaeological monitoring is therefore not required in this location and can be managed under unexpected finds call out procedure.

Zone 2- In areas that have been either signed off by the archaeologist for either being heavily disturbed or comprises natural, undeveloped ground, or sandstone bedrock, and not anticipated to be archaeological sensitive, can be managed under an Unexpected Finds Procedure.

In addition, it is recognised that across the subject area there is potential for deeper, undocumented archaeological features to survive. These may include undocumented features including wells, tanks, cesspits, rubbish pits and services.

Protocol for Unexpected Finds Procedure

- Should any archaeological material, including structural remains, artefacts, or other archaeological features, be uncovered during works, activities in the immediate area must cease immediately.
- The archaeological team must be notified promptly to assess the finds. Work in the area may only resume once an archaeologist has completed their assessment and provided clearance or guidance.
- The heritage induction (Stage 1) will detail the types of unexpected archaeological material that may be encountered on-site and outline the appropriate method for reporting these discoveries to the archaeological team.

If locally significant relics are uncovered that have previously been assessed by the HAA (Urbis 2026) but are found outside the mapped areas of archaeological potential (this may occur due to inaccuracies in historical overlays or limitations in prior investigations), these relics will still be treated as significant. They will be archaeologically recorded, and salvaged in accordance with the methodology outlined for Stage 3, ensuring consistency in heritage management and compliance with relevant statutory obligations.

This approach ensures that all archaeological material, whether within or outside previously identified areas of potential, is managed systematically, minimising the risk of inadvertent damage and ensuring that the cultural heritage values of the site are preserved.

3.9 Stage 5: Archaeological Reporting

A Final Report must be prepared at the completion of archaeological fieldwork; the reporting must meet government guidelines and the conditions of the relevant excavation approval. Reporting is required under Section 146 of the *Heritage Act 1977*. Reports are submitted to the Heritage Council of NSW or its delegate, and copies are lodged with local libraries or appropriate local repositories. Final Reports include at a minimum:

- Executive Summary
- On the title page, due credit to the client paying for the excavation
- Accurate site location and site plan with scale and north arrow and geo-reference data
- Historical research, references and bibliography
- Detailed information on the excavation including the aims, context for excavation, treatment of artefacts and analysis of information retrieved
- Nominated repository for artefacts
- Detailed response to research questions (at a minimum those stated in the Heritage Council approved Research Design).
- Conclusions from the archaeological programme including a re-assessment of the site's significance; how archaeological investigation have contributed to community understanding, comparison with other sites, recommendations for future management and how much of the site remains undisturbed.
- Details of how information about the excavation was made publicly available.

The scale and timing of the Final Report is based on the complexity and significance of the finds and can be determined at the completion of archaeological fieldwork

3.10 Standard Excavation Practices

3.10.1 Demolition and Services

Consult with the archaeologist when deciding the methodology for demolition or planning temporary or permanent service connections. In general, structures may be demolished to slab level without supervision but an archaeologist must be present when slabs are lifted. Footings and services must be left in-ground until archaeologists confirm removal will not impact archaeology – this may be after the completion of archaeological fieldwork. Demolition plans that require in-ground impacts, such as temporary piling or shoring when buildings are partly retained or the construction of ramps and haul roads, must consult with the archaeologist during the planning stages as this may affect the archaeological methodology and approvals. In general, existing service routes may be re-used but if new excavation is required to extend, repair or replace services, or if there is a proposal to use non-destructive digging, consult the archaeologist in the planning stages as this may affect the archaeological methodology and approvals.

3.10.2 Archaeological Monitoring

Monitoring involves a suitably qualified archaeologists working alongside an experienced mechanical excavator driver and directing the location, depth and method of excavation. The machine must be of an appropriate size to the task, work backwards from hardstand or areas of no archaeological potential so as not to disturb any exposed archaeology, have rubber tracks, use a mud bucket, and remove one stratigraphic layer at a time as defined by the archaeologist.

3.10.3 Manual Investigation

As defined by the archaeologist monitoring mechanical excavation, machine excavation ceases at the point at which potential archaeological relics are exposed. This is typically after the removal of modern fills and surfaces and the appearance of historic soil profiles or structures. Manual investigation can involve a team of archaeologists using small hand tools to expose and clean in detail archaeological structures, features and deposits. Manual investigation proceeds by identifying individual units or 'contexts,' usually a stratigraphic layer, cut, fill, deposit or structure, and excavating those units in a controlled manner. This can take place during either testing, monitoring or salvage excavation scenarios. The scale of manual investigation is related to the Research Design, the nature, extent, complexity, significance and condition of the archaeological resource and its research potential.

Occupation Deposits

If discovered, deposits require spatially controlled manual investigation by first identifying the levels and full extent of the deposit and establishing a grid of that area suitable to the size of the deposit, typically 1m x 1m squares if the deposit is within a room or yard space. A grid will not be necessary for deposits within wells, cisterns or privies. With small hand tools archaeologists manually excavate deposits in stratigraphic order to retrieve the artefacts in a controlled manner. Deposits are sieved through a 3–5mm mesh to ensure a high percentage or all artefacts are retrieved. The sample size for artefact collection can range up to 100% of those identified in the deposit, depending on the significance, Research Design and parameters of the site-specific excavation methodology. During this process, the Excavation Director reviews the artefacts recovered along with the stratigraphy to confirm the dating and significance of the deposit is within the range anticipated by the Research Design and the approvals in place for excavation.

3.10.4 Conservation In-Situ

Conservation in-situ can be achieved by avoiding disturbing an archaeological site, exposure and reburial of a site or exposure and conservation for public display, these options depend on the most appropriate strategy for the archaeological resource, its significance and the site conditions. Reburial includes, at a minimum, physical separation with stable and permeable materials such as geofabric and then 100mm of clean sand to avoid contact with introduced materials and disperse loads. Conservation areas should be avoided with deep plantings when areas are landscaped. Guides for conservation by display would be determined in a Heritage Interpretation Plan or Heritage Interpretation Strategy.

Assessing and planning for conservation is done with reference to *Archaeological Assessments Guidelines*, Heritage Office, Department of Urban Affairs and Planning, 1996. Those guidelines also reference the *Burra Charter*, Article 9 of which states that 'the physical location of a place is part of its cultural significance'. Archaeologists should always consider the in-situ retention of archaeological features for future generations, however, in many cases this is not possible. When conservation is not possible, the archaeological site should be comprehensively documented before its disturbance, including the details of its location and relationships (Article 27). In some cases, the removal and reconstruction of archaeological features at another place (for example, a museum) may be appropriate, especially where the original location is under threat of destruction.²

3.10.5 Archaeological Recording

Archaeological sites are recorded in several ways: Context Sheets, Harris Matrix, Photography, Diary, Scaled Site Drawings and Levels. Scaled Site Drawings are made to archaeological drawing conventions and are produced either by hand-drawing them on site or with data collected from photogrammetry. Scaled plans must be correlated with spatial survey information and the collection of Australian Height Datum (AHD) levels. Context Sheets are standardised forms that record descriptive and interpretive details for each individual unit that makes up the archaeological site (e.g. stratigraphic layers, structures, deposits). A Harris Matrix is used to

² Burra Charter and Archaeological Practice 2013 p 4
P0057311_47–97 Marlborough St, Surrey Hills_HARDEM

define the relationships between those individual units. The site diary tracks daily progress and interpretations of stratigraphy, phasing, site taphonomy and identification of individual units. Photography includes the use of a labelled photo board, north arrow and scales, archival photos must shoot in a RAW format and comply with the *Photographic Recording of Heritage Items Using Film Or Digital Capture*. Records are accompanied by registers that track the creation of archaeological data. must fulfil the expectations of any approvals for excavation, best practice and government guidelines.

3.10.6 Artefact Analysis and Storage

Historical artefacts recovered during archaeological test excavation, salvage and monitoring would be catalogued and analysed for presentation and inclusion in an excavation report. All artefact bags would be processed as soon as possible after recovery.

Post-excavation analysis of materials recovered during excavation would be undertaken in a suitable secure location by the Urbis Archaeology Team under the supervision of the Excavation Director. Artefact processing would be undertaken off-site, as follows:

- Artefacts would be cleaned and dried
- Artefacts would then be divided into categories according to their type and fabric and, in the case of glass and ceramics, by colour
- Categorised artefacts would then be further divided into diagnostic and non-diagnostic artefacts (with further consideration given to the diagnostic artefacts)
- Bulk-find items (e.g. non-diagnostic glass, shells, wooden fragments, non-diagnostic metal, etc.) would be weighed and recorded and retained for future research purposes
- The remaining artefacts would be retained for further analysis and research
- Diagnostic artefacts suitable for display would be identified and labelled

Processing would involve cleaning and photographing each artefact and entering it into a database with all relevant information, as indicated on the bag, as well as additional interpretation, photograph numbers and potential relationships. Artefact bags should then be stored in archive boxes which are clearly labelled by context and returned to the Proponent for long-term storage and curation.

Following processing and stabilisation of artefacts, cataloguing of artefacts will be based on the following three-tier priority system.

Priority 1 – Single event fills/deposits which have the potential to have direct links to occupants and may have the ability to respond to Research Design questions. Contexts may include occupation deposits and fills from cesspits and wells, underfloor deposits and intact rubbish pit fills.

Priority 2 – Deposits or fills important for dating purposes but unlikely to contribute to the responses to Research Design questions or form useful comparative analysis. These contexts may include demolition fills (including within cesspits and wells), postholes/postpipes, yard deposits and disturbed rubbish pit fills.

Priority 3 – Levelling fills and unstratified artefacts.

These three priorities will form the basis of the standard cataloguing that will be undertaken:

Table 2 Catalogue standard by priority

Priority	Standard Catalogue
1	Best practice for comparative assemblage analysis: all fields + MV counts + conjoin checks + additional research
2	Best practice for dating: all fields; undiagnostic sherds will be bulk bagged

Source: Adapted from *Mountains Heritage* and Dr Penny Crook (December 2024)

3.10.7 Artefact Discard Policy and Procedure

This discard policy is divided into two main stages, on-site discard and post-excavation discard.

3.10.7.1 On Site Discard Policy

Non-Significant Fills

Artefacts from non-significant fills will be sampled on site. If present, a collection of 19th century artefacts will be sampled on site. Photographs will first be taken of all artefacts within their fill context, followed by selection of only diagnostically datable artefacts for retention and off-site cataloguing. Remaining artefacts from non-significant fills will be discarded on site. Soil samples are not required to be collected from non-significant fills.

Building Material Samples

A building material sample, such as bricks or mortar, may be taken from each structure recorded as a physical sample for reference during post-excavation analysis and production of the final excavation report. Bricks which contain frogs or makers marks are to be prioritised for sampling. Typically, only a single brick needs to be sampled from each structure.

Soil Samples

In a historical archaeological context, soil samples should only be collected from significant occupation deposits (fills from cesspits and wells, underfloor deposits and intact rubbish pit fills), postholes/postpipes or slot trenches, drain deposits, or evidence of early agricultural activities (hoe marks).

3.10.7.2 Post Excavation Discard Policy

While sampling strategies can be employed on site, it may also be necessary, in the case where excessive numbers of artefacts are collected from the site, to establish a retention policy for which artefacts warrant ongoing storage post-cataloguing and which can be discarded. While there are no specific guidelines available in NSW regarding artefact retention or discard, it is generally understood that the only artefacts that retain cultural heritage significance or have the potential for future research and comparative analysis are essential to retain, in particular for large assemblages.³

More broadly, much of the discussion about discarding archaeological artefacts is led by museum curators and archivists responsible for managing them (e.g. Merriman 2011, among others). All agree that only artefacts of high cultural significance or potential for future research, should be retained for long-term preservation. Several factors need to be considered to determine the cultural significance and future research potential including stratigraphic context, diagnostic capacity and integrity.

As established in Section 3.8.6 above, stratigraphic context plays a major role in the significance of an individual artefact and thus for this site, a cataloguing priority system has been established to categorise the significance of these artefacts within their stratigraphic context. This process will establish the artefacts which are considered of high research value and significance which will be catalogued as Priority 1. These artefacts should all be retained for long-term storage.

Artefacts from Priority 2 and 3 should be largely considered for their diagnostic capacity as a tool for understanding the research potential for the object. Diagnostic capacity largely relates to the ability for an artefact to provide unique information which can complement or even change what is understood about the

³ Heritage Victoria (2015), p.12; Merriman 2011; Swain 2007, p.139

historical context for the archaeology of the site. More complex artefact classes, such as ceramics and miscellaneous, are more likely to yield unique research data compared to other material classes such as faunal, metal or glass which may be represented by larger quantities of undiagnostic fragments or repeat types. Artefacts of higher integrity (completeness) may also offer more research value and thus may also warrant retention.

Artefacts from Priority 2 contexts are mainly valued for dating purposes, as such, significant artefacts, or those with research potential and diagnostic capacity, from these contexts should be retained while artefacts with minimal research potential may be discarded along while those represented by repeat types may be sampled. As Priority 3 artefacts will largely be from non-significant stratigraphic contexts or are unstratified, only rare artefacts, or those of significant research potential, should be retained.

Table 3 Artefact discard matrix

<i>Diagnostic capacity</i>	<i>P1 Contexts</i>	<i>P2 Contexts</i>	<i>P3 Contexts</i>
High	Retain	Retain	Retain
Moderate	Retain	Sample	Discard
Low or Limited	Retain	Discard	Discard

Retain	Artefact will be retained in the nominated artefact repository
Sample	A representative example of the artefact will be retained and the remainder discarded
Discard	The artefact will be disposed of following recording appropriate to its type.

Source: Mountains Heritage and Dr Penny Crook (December 2024)

Based on these principles, the following process will be undertaken for the study site:

1. Artefacts with high research potential will be retained – this includes consideration of stratigraphic context, diagnostic capacity, significance and integrity.
2. Artefacts with no or limited research potential will be discarded, however, as a minimum all artefacts will be counted, weighed and photographed.
3. Prior to discard, an artefact specialist should physically inspect artefacts nominated for discard.
4. Any discarded artefacts should be considered for donation for educational purposes or safely disposed of.
5. Retained artefacts must be securely stored.

The following process will be undertaken:

1. Artefacts will be catalogued based on the stratigraphic priority system.
2. All artefacts from Priority 1 contexts will be retained.
3. During cataloguing of Priority 2 and Priority 3 assemblages, an artefact specialist will identify those with limited or low potential nominated for discard.
4. During cataloguing, the research potential of contexts may be revised and any additional artefacts with low or limited research potential will be identified.
5. Artefacts to be discarded will be inspected by an artefact specialist.
6. A final list of artefacts to be discarded will be subject to approval by the artefact specialist and Primary Excavation Director.
7. Any artefacts, due to be discarded, will be offered for donation is suitable.
8. Discarded artefacts will be safely disposed of and will not be sold.

3.10.8 Final Archaeological Report

A Final Report must be prepared at the completion of archaeological fieldwork, the reporting must meet government guidelines and the conditions of the relevant excavation approval. Reporting is required under

Section 146 of the *Heritage Act 1977*. Reports are submitted to the Heritage Council of NSW or its delegate and copies are lodged with local libraries or appropriate local repositories. Final Reports include at a minimum:

- Executive Summary
- On the title page, due credit to the client paying for the excavation
- Accurate site location and site plan with scale and north arrow and geo-reference data
- Historical research, references and bibliography
- Detailed information on the excavation including the aims, context for excavation, treatment of artefacts and analysis of information retrieved
- Nominated repository for artefacts
- Detailed response to research questions (at a minimum those stated in the Heritage Council approved Research Design).
- Conclusions from the archaeological programme including a re-assessment of the site's significance; how archaeological investigation have contributed to community understanding, comparison with other sites, recommendations for future management and how much of the site remains undisturbed.
- Details of how information about the excavation was made publicly available.

The scale and timing of the Final Report is based on the complexity and significance of the finds and can be determined at the completion of archaeological fieldwork

3.10.9 Interpretation and Public Information

Archaeological sites may be subject to excavation permit conditions that require heritage interpretation strategies and plans that connect the redevelopment of a site with the information and significance gathered from archaeological excavation. Interpretation is a best practice method of connecting place, people, history and meaning. Interpretation strategies may recommend physical and/or digital means of public information such as signage, paving, displays, material selection, design details, landscaping and adapting design to allow for conservation in-situ.

4 Recommendations

4 Recommendations

- This Historical Archaeology Research Design and Excavation Methodology (HARDEM) should be read with the Urbis (2026) Historical Archaeological Assessment (HAA) prepared for 47-97 Marlborough Street, Surrey Hills, NSW.
- This HARDEM and HAA (Urbis 2026) should be submitted as supporting documentation for the State Significant Development Application (SSDA) (SSD-78545225), to the NSW Department of Planning, Housing and Infrastructure for the proposed development of 47-97 Marlborough Street, Surrey Hills, NSW.
- A response to the Criteria for Assessing Excavation Directors (Heritage Council of NSW 2019) should be prepared by the nominated Primary Excavation Director, Jaki Kennedy or Kelly Strickland and nominated Secondary Excavation Director. This response also needs to be submitted as supporting documentation for review and endorsement by Heritage NSW, to the NSW Department of Planning, Housing and Infrastructure.
- Stage 2 – Archaeological inspection (Zone 2) cannot commence on site until the HARDEM has been endorsed by Heritage NSW. Archaeological inspection will commence during the demolition of the existing carpark surface in north part of the site within Zone 2. The results of Stage 2 will inform the requirement for Stage 3 – Archaeological Monitoring and Salvage (if required).
- The proposed works cannot commence on site until the HARDEM has been endorsed by Heritage NSW.

5

References

5 References

Discard Policy and Procedure

Heritage Act 1977 (NSW).

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

Heritage Council of NSW (2001). *New South Wales Historical Themes*

Heritage NSW (2019). *Criteria for Assessing Excavation Directors.*

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

Heritage Office, Department of Urban Affairs and Planning (1996), *Archaeological Assessment Guidelines.*

Heritage Victoria (2015). *Guidelines for investigating historical archaeological artefacts.*

Mountains Heritage and Penny Crook, 2024. 60-80 Oxford Street & 2A James Street, Woollahra – Artefact

National Parks and Wildlife Act 1974 (NSW).

Urbis (2026), Historical Archaeological Assessment: 47-97 Marlborough Street, Surry Hills, NSW.

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Appendix Heading



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