URBIS

HISTORICAL ARCHAEOLOGICAL RESEARCH DESIGN & EXCAVATION METHODOLOGY

164-194 William Street
Woolloomooloo, NSW

FINAL

Prepared for
WILLIAM STREET NOMINEE PTY LTD
August 2025

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Project Code	P0036191
Report Number	Draft issued 13 June 2025
	Draft 2 issued 8 August 2025
	Final issued 29 August 2025

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EXECUTIVE SUMMARY

This Historical Archaeological Research Design and Excavation Methodology ('HARDEM') has been prepared by Urbis to accompany the proposed State Significant Development Application (SSDA) for a mixed-use infill affordable housing development at 164-172 and 174-194 William Street Woolloomooloo. The site is made up of two (2) lots. The legal description of the site is outlined in Table 1.

Table 1 - Legal Description

Property Address	Title Description
164-172 William Street, Woolloomooloo	Lot 52 in DP1049805
174-194 William Street, Woolloomooloo	Lot 1 in DP816050

This report has been prepared to address the Secretary's Environmental Assessment Requirements (**SEARs**) issued for the project (SSD-80211463).

This report concludes that the proposed development is suitable and warrants approval subject to the implementation of the following mitigation measures.

- The HAIA and the HARDEM need to be submitted via Major Projects as part of the Environmental Impact Statement (EIS) documentation in response to the Secretary's Environmental Assessment Requirements (SEARS) for the State Significant Development application SSD-80211463.
- Both documents should also be submitted for review and endorsement by Heritage NSW as agency advice for heritage management on behalf of the Minster for Planning.
- The implementation of the recommended archaeological methodologies cannot commence on site until the HARDEM has been endorsed by Heritage NSW.
- Archaeological monitoring and sampling will be staged with the demolition and bulk excavation program. Demolition down to slab level is permissible without archaeological involvement however any subsurface impacting works should be undertaken in consultation with the archaeological team per the methodology provided in this document.

Following the implementation of the above mitigation measures, the remaining impacts are appropriate.

1. INTRODUCTION & BACKGROUND

Urbis has been commissioned by William Street Nominee Pty Ltd to prepare this report in accordance with the technical requirements of the Secretary's Environmental Assessment Requirements (SEARs), and in support of the State Significant Development Application (SSD-80211463) for the proposed mixed-use infill affordable housing development at 164-172 and 174-194 William Street Woolloomooloo.

Following the Design Excellence Competition, the scheme has been revised to include In-fill Affordable Housing (**IAH**) in line with the NSW Government's policy under the *State Environmental Planning Policy (Housing) 2021* (*Housing SEPP*). This policy allows for a 30% increase in Floor Space Ratio (**FSR**) and building height when 15% of the total FSR is provided as affordable housing for 15 years. The proposed development meets these criteria and is eligible for the bonus uplift.

Given the residential component's Capital Investment Value (**CIV**) exceeds $75 million, an SSDA pathway can be taken. The proposal retains key design principles recommended by the Design Excellence Panel and aims to provide additional residential dwellings with a 30% increase in GFA and building height, in accordance with the Housing SEPP.

The purpose of the project is to facilitate the delivery of a high-quality mixed-use development containing residential and retail uses as well as a centrally located park, public domain improvements and improved through-site connectivity at a strategically located site. The proposal seeks to deliver a built form outcome that responds appropriately to its location on William Street in Woolloomooloo and in close proximity to Kings Cross Station and the Sydney CBD. Furthermore, the proposed scheme seeks to deliver an outcome that is consistent with the desired and evolving character of the Woolloomooloo and Potts Point area.

Specifically, this SSDA seeks consent for:

- 227 apartments (167 market housing, 60 affordable housing units)
- Ground floor retail and commercial uses with 7 – 18 storeys of residential tower across four buildings being:
  - FJC - William Street (West)
  - FJC - William Street (East)
  - Studio Bright – Forbes Street
  - Tribe Studio – Dowling Street
- A publicly accessible central park
- Public domain works and improved through-site links
- Four basement levels for parking, services and storage
- Vehicular and loading access from Forbes Street

This report has been prepared in response to the requirements contained within SEARs dated 21 February 2025 and issued for SSD-80211463. Specifically, this report follows the recommendations of the Historical Archaeological Assessment (HAA) which responds to the SEARs requirement issued below.

Table 2 – - SEARs Requirements

Issue	Description of Requirement	Reference
22. Environmental Heritage	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 the relevant guidelines.	Historical Archaeological Assessment (2025)

1.1. SUBJECT AREA & SURROUNDING CONTEXT

The site is located at 164-172 and 174-194 William Street Woolloomooloo within the City of Sydney LGA. The site is comprised of multiple allotments and is legally described as:

- 164-172 William Street, Woolloomooloo
  - Lot 52 in DP1049805
- 174-194 William Street, Woolloomooloo
  - Lot 1 in DP816050

The land size totals 6,398m2 and consists of a southern frontage to William Street, an eastern frontage to Dowling Street, a western frontage to Forbes Street and northern frontage to Judge Lane.

The immediate urban context surrounding the site is characterised by a mix of medium density residential, commercial, and retail uses. The site is in close proximity to Hyde Park, The Domain, and Rushcutters Bay Reserve. There are a number of educational and health services in proximity to the site, providing ample infrastructure support for the community.

William Street, to which the site fronts, is a classified road providing connection between the Eastern Suburbs of Sydney and the CBD. Vehicle access is currently provided from six points on the site from Judge Lane, Forbes Street, and Dowling Street. Pedestrian access to the site is currently available from all frontages.

The site is highly accessible to both bus and rail services, being approximately 300m away from Kings Cross Railway Station and having direct access to bus services on William Street that provide connections through the Metropolitan Transport Network.

At the time of lodgement, the site is improved by a warehouse style structure and glass office building to the site's frontage and an at-grade private carpark to the northwestern portion of the site.

1.2. SCOPE AND LIMITATIONS

This report provides a historical archaeological research design and excavation methodology to guide archaeological excavation at the study site. This HARDEM should be read with the Historical Archaeological Assessment (Urbis, May 2025)

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.*

This document does not assess the potential Aboriginal archaeology of the study site. However, any Aboriginal sites and objects are protected by the National Parks and Wildlife Act 1974. An Aboriginal Due Diligence (ADD) report for 164-172 and 174-194 William Street, Woolloomooloo, NSW, prepared by URBIS, concluded that that there is no known Aboriginal cultural heritage on or near the subject area, nor is it reasonably likely that Aboriginal cultural heritage occurs on or near the subject area.

This HARDEM also 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)

1.3. PROPOSED DEVELPOMENT

The proposed development of the subject area comprises the construction of a multi-storey mixed-use development including 15% affordable housing.

The proposed development includes the following works:

Demolition of existing structures

Excavation for four basement levels across the entire subject area

Construction of four new multi-storey buildings, including:

- Basement car parking, storage and services
- Ground floor retail
- Commercial and residential uses on upper floors.
- Pedestrian laneway and through-site links and vehicle access from Forbes Street

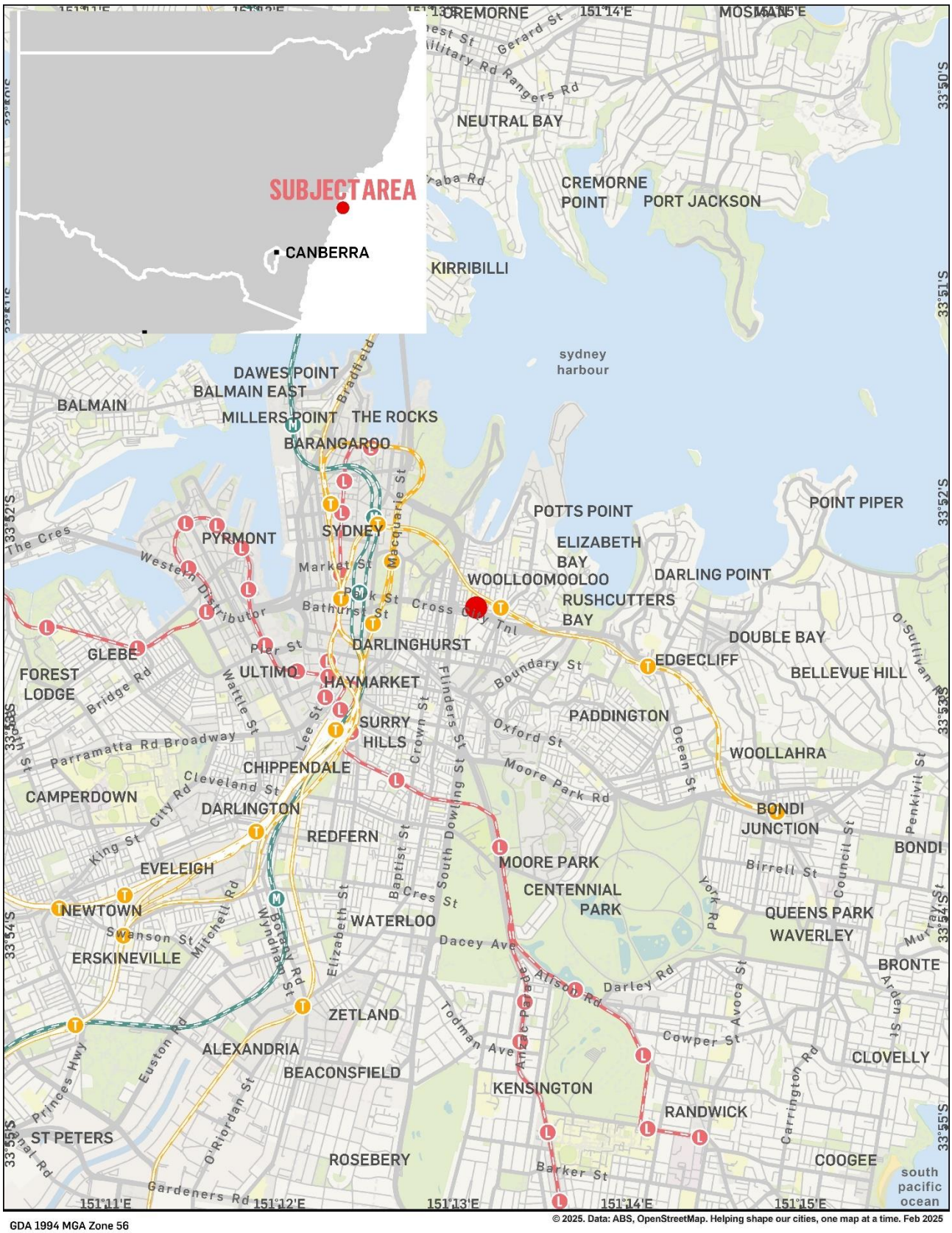
1.4. STATEMENT OF ARCHAEOLOGICAL HERITAGE IMPACT

The proposed works are described in Section 1.3 above include demolition of all existing buildings and the construction of a new multi-storey mixed-use development with four basement levels extending across the entire subject area.

There is moderate to high potential for relics to be retained within the subject area in areas corresponding to known and likely mid-19th century development where subsequent ground disturbance is low or moderate. This corresponds to:

- The area within the footprint of the extant buildings facing William Street on the southern portion of the subject area.
- The area between the extant 1970s hardstand carpark the northwestern portion the site and the access ramps to the extant warehouse building in the central portion of the subject area

As there is moderate potential for locally significant archaeological resources to be retained within parts of the subject area and the proposed ground-disturbing impacts extend across the entire subject to a depth sufficient for four basement levels, there is reasonable cause to suspect that the proposed works will impact historical archaeological relics (Figure 3). The HAA did not identify the potential for the presence of State significant archaeological resources.



GDA 1994 MGA Zone 56

1 KM

Project No: P0036191
Project Manager: Aaron Olsen

Subject Area

REGIONAL LOCATION
164-194 William Street Woolloomooloo
Rebel Property

Figure 1 – Regional location of subject site

Figure 2 – Aerial photograph of subject site

Figure 3 - Archaeological potential of known former structural features

Source: URBIS 2025

2. ARCHAEOLOGICAL RESEARCH DESIGN

The HAA (Urbis 2025) has identified the potential for locally significant archaeological relics demonstrating mid to late 19th century domestic and urban development across the subject area. As the Proponent seeks to develop a site with potential for local significant relics, and may impact those relics, this Research Design guides those works. The Research Design is tailored to the nature, scale and significance of the site's archaeological relics. The Research Design questions are limited by the scope of proposed works and the archaeological relics, however, should field results allow further study, the research design will be extended with appropriate questions. If more significant archaeological resources are identified the Research Design questions would need to be revised.

The following research questions allow archaeologists to evaluate the site in both a quantitative and qualitative sense. Section 2.1 provides research questions designed to re-assesses the site's archaeological potential based on field results to make quantitative statements about the archaeological data available at the site and how suitable that data is as a resource for further research. Section 2.2 fulfils the primary aim of the research design by using the archaeological data to respond to thematic areas of research relevant to New South Wales.

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 3 – Historical themes relevant for the study site

Australian Theme	**NSW State Theme**	**Study Site**
4 Building settlements, towns and cities	Towns, suburbs and villages	Early 19th century road
4 Building settlements, towns and cities	Utilities	Services associated with Thompson residence and Hobart House and public sewer (1840s) as well as the Forbes Street Terraces (1870s)
4 Building settlements, towns and cities	Accommodation	Thompson residence, Hobart House (1840s) and Forbes Street Terraces (1870s)
6 Educating	Education	'Ailanthus College', former Thompson residence (1870s)
8 Developing Australia's cultural life	Domestic life	Thompson residence, Hobart House (1840s), Forbes Street Terraces and 'Ailanthus College', former Thompson residence (1870s)
8 Developing Australia's cultural life	Religion	Wesleyan Church (1870s)

[1] *New South Wales Historical Themes*, Heritage Council of NSW, 2001

2.1. RE-ASSESSMENT OF ARCHAEOLOGICAL POTENTIAL

Describe the condition of the site's archaeology, is it intact?

- Consider whether the site's natural soil profile could be identified and if it survived intact.
- Consider what site formation processes have occurred to disturb or preserve the site.
- Were relics discovered? Where are they located and between what range of AHD levels do they survive?
- Is the site interpretable as a resource for research?
- If the site was not completely excavated, describe the site's remaining archaeological potential.
- How does its level of disturbance compare to what was initially assessed by the Historical Archaeological Assessment?

2.2. NSW HISTORICAL THEMES RESEARCH QUESTIONS

2.2.1. Site Topography and Formation Processes

The subject area is located on the lower side slopes of a ridge that runs in a generally northerly direction from Darlinghurst through Potts Point. The development of the site from the mid-19th century has changed the land's surface, being changes that remain clear and observable, including vegetation clearance, construction and demolition of buildings, the installation of underground services and the establishment of interspaced basements levels specifically along the William Street frontage.

- What was identified at the site? What kinds of remains, features or deposits?
- What information can be sourced regarding the original topography of the area? To what extent has this been impacted on by post-European settlement?
- To what extent has site formation processes affected the historical archaeological record of the site?
- Were any unexpected/ undocumented relics uncovered during archaeological works? What development phase do they fit into? Does this change our understanding of the broader site formation processes?

2.2.2. NSW Theme: Towns, suburbs and villages

The earliest form of development within the subject area was an early 19th century road which divided the early lands grants attributed to James Dowling (1828) and William Cordeaux (c.1828) and connected a former alignment of Forbes Street to Darlinghurst Road. With subsequent development and land exchanges the subject area was subdivided multiple times during the mid to late 19th century:

- Has any evidence of road building materials or discarded items associated with road construction survive within the subject area after the 19th and 20th century developments? Was any evidence of the road infrastructure encountered on site?
- What can evidence associated with transient use of the subject area tell us regarding the period of use and areas of activity within the wider Woolloomooloo area?
- Has any evidence of land subdivision been identified to support the original lot alignments illustrated in the 1829 map of Woolloomooloo? Was any evidence of the mid-19th century subdivisions or subsequent alterations encountered on site?

2.2.3. NSW Theme: Domestic Life

Historic research indicates that following the issue of crown land grants and subsequent exchanges, the study site was developed for domestic occupation from the mid-19th century onwards. During the 1840s two residences were established along William Street which are associated with John Thompson (Deputy Surveyor General) and William Hobart Thorne (first European born in Victoria). During the 1870s terraces were established on Forbes Street. In a predominantly working-class area, historical research has informed that, during the early period of occupation, these were occupied by wealthy citizens:

- Were any occupation deposits (artefact scatters, yard deposits, rubbish pits) found that can be linked to the 19th century use of the site?
- What can intact occupation deposits tell us about settlement patterns, as well as domestic practices of an early developing urban environment? What are the patterns of subsistence and occupational use and how do they inform us about this local area?
- Was any evidence found of the Thompson House indicated on the 1843 letter written by John Thompson? Was any evidence found of the room layout and functionality sketched and described in Thompsons letter? Did they contain intact and datable deposits that could be linked with this particular domestic occupant?
- Was any evidence found of the surrounding landscaping, water pump and retaining walls also sketched in Thompsons letter?
- Was any evidence found of Hobart House and ancillary buildings as indicated by the 1848 rates assessment book and the 1855-1865 trigonometrical survey.
- Was any evidence found of 1870's Forbes Street terraces of the site? Did they contain intact and datable deposits that could be linked with particular domestic occupants known from Sands Directory research? Did they contain intact and datable deposits that reflected wealth or/and class of domestic occupants?
- What can the construction techniques, size, layout and form of the 1870s terraces tell us regarding the period of use and areas of activity? How were buildings modified over time and how does this reflect changes of use?
- What can the contents of occupation deposits from beneath floors (if present), rubbish pits and wells/cisterns (if present) tell us about the daily lives and domestic practices of the occupants of terraces? How does this compare with artefact assemblages from the nearby similar sites, that may not be available from other sources?
- The study site was connected public services early on its commencement of development. Were cesspits used prior to this?. If so, these features tend to be deeper and more likely to contain intact/ undisturbed deposits. What can the contents of occupation deposits from cesspits (if present) tell us about the daily lives and practices of 19th century community members? Can these deposits (if present) be compared to recorded assemblages from nearby sites with similar domestic occupation phasing?
- How does the archaeological evidence recorded on site supplement the 19th century historic plans obtained during research? Do any of the surviving structural remains contain evidence of internal layouts of buildings? Can information be drawn regarding room function or patterns in use of domestic space during the mid to late 19th century, and are there commonalities across the Sydney inner region during this time?

2.2.4. NSW Theme: Utilities

A trigonometrical survey conducted between 1855 and 1865 recorded the presence of a main public brick sewer line along the former outline of Judge Street at the central portion of the subject area. Further sewer connections to the residences on William Street, established in the 1840s, are also depicted:

- What evidence is the introduction of town utilities to the residential and commercial premises on the study site? How does this compare to other parts of the Sydney CBD?
- Is there any evidence of the residents managing their own access to water, such as domestic wells, the documented water pump or of the management of waste before the availability of town sewerage etc.?
- Does the archaeological record reflect differentiated materiality between the main sewer line and the residential connections?
- What can the evidence demonstrate in regards to early forms of waste management within the wider Woolloomooloo area and how did it shape its development?

2.2.5. NSW Theme: Education

Historical research has informed that the 1840s Thompson Residence was adaptively re-used as a female educational facility between the late 1860s and early 1870s and renamed as 'Ailanthus College' under the guidance of Mrs. Annie Gillam. The Wesleyan church established in 1871 also functioned as a school which featured a stepped floor, an adaptation to the sites sloped nature:

- Was any evidence found of 'Ailanthus College' 1870's alterations to the original layout of the Thompson Residence. Can deposition be linked directly to the use of the building as an educational facility?
- Can any archaeological evidence be drawn to provide additional information surrounding its function as an educational facility?
- Was any evidence found of the buildings alterations specifically indicated on the 1888 Rygate & West survey? To what extent was it impacted by the later 20th century development?
- Did the archaeological record produce evidence of the school associated with the Wesleyan school? To what extent was the Wesleyan school impacted by the later 20th century development?
- Were any archaeological features associated with the Wesleyan school's stepped floor identified?
- Was there any evidence of association between the two educational facilities?

2.2.6. NSW Theme: Religion

A Wesleyan church and school were established on the corner of Forbes Street and William Street in 1871. It was designed by Thomas Rowe in the Gothic style with an uncommon layout which adapted to the natural slope of the site. It included a nave with an amphitheatre style floor to also account for the incline:

- Was any evidence found of the Wesleyan church and school as indicated on the 1888 Rygate and West survey?
- How does the archaeological evidence recorded on site supplement the 19th century historic descriptions obtained during research? Do any of the surviving structural remains contain evidence of internal layouts of buildings? Did the archaeological record reflect the adaptations to the sites topography?
- Was any evidence of occupational deposition directly associated with religious use of the site found? What can these deposits inform regarding the spiritual practises of the local community?

3. EXCAVATION METHODOLOGY

This section provides a site-specific methodology to gather information from archaeological investigations to respond to the Research Design and inform or guide the remainder of development works at the study site. The scope of the methodology is based on the range of site activities that may impact the range of significant archaeology identified on the study site within the Historical Archaeological Assessment prepared by Urbis in 2025.

3.1. APPROVAL PATHWAY

The proposed development qualifies as a State Significant Development under the *Environmental Planning and Assessment Act 1979* (NSW) and is presently under assessment by the consent authority. Under the State Significant Development planning pathway, permit application approvals normally required to manage historical archaeology under *Heritage Act 1977* (NSW), such as Section 140 Excavation Permits or Section 60 Approvals are not active nor required for archaeological fieldwork. However, historical archaeological reports including Historical Archaeological Assessments (HAA) and Historical Archaeological Research Designs & Excavation Methodologies (HARDEM) still require review and endorsement by Heritage NSW as a delegated state government agency guiding heritage management under State Significant Development planning pathway.

This HARDEM will need to be submitted via the Major Projects website for review and endorsement by the consent authority. A response to the 2019 Excavation Director Criteria published by the Heritage Council of NSW will also be required to be prepared and submitted as part of the historical archaeological requirements.

3.2. IN-SITU CONSERVATION

Conservation in-situ is one of an array of methods to mitigate heritage impacts to archaeological sites. It may be warranted for a variety of reasons, such as their historic, social or research value. 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]

In-situ conservation is generally considered for relics of high significance including State significant relics of high integrity. While the HAA established that it is unlikely to expect for the presence of State significant relics, if such archaeological resources are identified further consultation with the NSW Heritage Council or its delegate may be required to assess whether preservation in-situ is required.

3.3. ARCHAEOLOGICAL TEAM

As the site has expectations to expose and impact on archaeological relics of local significance, the excavation must be guided by a suitably qualified Excavation Director that meets the Heritage Council of NSW Criteria for Assessing Excavation Directors (HNSW Advice Item 9). The nominated archaeological team for Stage 1 (salvage excavation) and Stage 2 (monitoring and unexpected finds protocol) includes the following however will be subject to change based on availability:

- Excavation Director (Jaki Kennedy)
- Secondary Excavation Director (Johnny Sokalik)
- Site Director (Aaron Olsen)
- Archaeologist/ Photogrammetry Specialist (Emma Williams)
- Archaeologist/Photographer (Hayley Campbell, Jordan Gilbert, Juliet Schofield, Natalie Taylor, Pedro Silva)

[2] Burra Charter and Archaeological Practice 2013 p 4

3.4. HERITAGE INDUCTION

Prior to the commencement of any works, 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 to do in the event that archaeological remains are uncovered in areas not subject to archaeological monitoring (Call Out Procedure).
- How to work with monitoring 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), and digital materials such as PowerPoint slides for integration into other contractor's site induction. Supervising archaeologists should also provide an update on the results of monitoring as part of a pre-start meeting each morning.

3.5. EXCAVATION AREAS AND ZONES

The subject area has been divided in areas differentiated by type of methodology to determine the extent to which locally significant relics survive on site. Three zones have been established based on the varying sensitivity across the site and to address archaeological potential of the various archaeological resources and/or locally significant relics that may have survived 20th century redevelopment (Figure 4).

Considering the proposed development's impact covering the entire extent of the subject area to a subsurface level varying between approximately 5 and 15 metres depth, there is no avenue for investigation prior to the commencement of demolition works. The recommended appropriate methodology has been developed to be implemented during the course of demolition and bulk excavation works.

Should it be required, perimeter piling can occur prior to archaeological monitoring commencing. It is understood that the perimeter piling will need to be in place to ensure the safety of the site prior to excavation, as such, relics in the location of this piling will not be able to be recorded prior to impact.

The methodology will address the research questions established above in Section 2.2. No State significant relics have been identified within the study area. Should State significant relics be exposed, works will cease, and Heritage NSW will be contacted regarding their management.

Figure 4 - Archaeological Zoning

Source: NearMap with Urbis Overlay

3.5.1. Zone 1: Monitoring and Salvage Excavation

Zone 1 (green) addresses the low to high potential for the presence of archaeological resources associated with the mid-19th century development and occupation, specifically the Thompson residence and Hobart House such as services and utilities, footings and deeper subsurface features (wells, cisterns and cesspits) as well as the evidence of the main public brick sewer. Late 19th century alterations to the Thompson residence, by this period known as ‘’Ailanthus College’, may also be addressed by this methodology.

Any excavation required for the proposed development within Zone 1 will be monitored by the Primary/Secondary Excavation Director or an archaeological supervisor. This will enable the identification of locally relics within this zone and allow for full archaeological recording and salvage or relics by the archaeological team.

During the course of archaeological monitoring, it may be identified that the archaeological potential in this area is lower than expected. In this case, the excavation directors may decide that archaeological monitoring is not required and excavation will be able to proceed based on the Unexpected Finds Protocol described for Zone 3 (Sub section 3.5.3).

The standard excavation practises to be applied within Zone 1 are described in Subsections 3.6.2, 3.6.3 and 3.6.5 below.

3.5.2. Zone 2: Monitoring and Sample

Zone 2 (orange) addresses the moderate to high potential for the presence of archaeological features and relics linked to the late 19th century Forbes Street Terraces which may take form as artefact deposits, ancillary buildings, and deeper subsurface features (wells, cisterns and cesspits).

Any excavation required for the proposed development within Zone 1 will be monitored by the Primary/Secondary Excavation Director or an archaeological supervisor. This will enable the identification of locally significant relics within this zone. Once the terraces are exposed, the most intact terrace, or that with interpretable occupation deposits, will be sampled through full archaeological excavation and recording.

During the course of archaeological monitoring, it may be identified that the archaeological potential in this area is higher than expected. In this case the excavation directors may decide that archaeological sampling is not sufficient to capture the extent of identified resources and may require full archaeological recording and salvage as described above (Subsection 3.5.1). Should archaeological resources not be identified in Zone 2, previously assessed to have moderate or high potential, or be too heavily disturbed to meet the requirements of the research design, the Excavation director may nominate to proceed with the methodology proposed for Zone 3 (Subsection 3.5.3 below).

The standard excavation practises to be applied within Zone 2 are described in Subsections 3.6.2, 3.6.3 and 3.6.5 below.

3.5.3. Zone 3: Unexpected Finds Protocol

Zone 3 (blue) addresses the low potential for the presence of archaeological resources associated with the early 19th century road and land division of early lots and subsequent subdivision and the late 19th century Wesleyan church and school. The latter development may take shape as structural remains of the religious and educational institution.

In areas identified as having low archaeological potential for archaeological relics, although considered highly unlikely, should any archaeological deposits be uncovered during any site works, the following unexpected finds procedure must be implemented:

1) All works must stop in the immediate vicinity of the find. The find must remain undisturbed and temporary fencing established around the find.
2) The Site Supervisor, or another nominated site representative must contact the Excavation Director to communicate the discovery of the find.
3) The Excavation Director (or an archaeologist delegated by the Excavation Director to assess the find), must examine the find, provides a preliminary assessment of significance, record the item and decides on appropriate management strategy.
4) Depending on the significance of the find, re-assessment of the archaeological potential of the area may be required, and further archaeological investigation required. If further manual excavation and recording is required, the methods outlined in Section 7.2.6 would be followed.

5) Works in the vicinity of the find can only recommence upon on the written advice of the nominated Excavation Director.

If unexpected archaeological finds are identified during the course of works the excavation directors may decide that the application of methodologies outlined in the above Subsections 1.1.1 or 3.5.2 may apply.

3.6. STANDARD EXCAVATION PRACTICES

An introduction to standard practices for the excavation of historical archaeological sites in alignment with:

- *Archaeological Assessments Guidelines,* Heritage Office, Department of Urban Affairs and Planning, 1996.
- *Historical Archaeology Code of Practice,* Heritage Council of NSW, 2006.
- *Assessing Significance for Historical Archaeological Sites and 'Relics'* Heritage Council of NSW, 2009

3.6.1. 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.

3.6.2. 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.

3.6.3. 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, occupation 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.

3.6.4. 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.

3.6.5. 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 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.

3.6.6. Artefact Analysis and Storage

Artefacts collected from the archaeological site must be cleaned, stabilised and sorted; also labelled, catalogued and stored so they may be retrieved according to both type and provenance. The Applicant is responsible for the safe-keeping of all relics recovered from the site and must nominate a repository for the long term storage of the artefacts, usually the study site. If the research potential and significance of a site is sufficient, artefact analysis specialists are engaged to catalogue and analyse the assemblage. Significant assemblages may also be nominated for archival photography and recording, conservation and public display.

3.6.7. Artefact Discard Policy and Procedure

The following artefact discard policy and procedure has been developed specifically for the proposed works as part of the redevelopment of the 164-172 and 174-194 William Street site. This discard policy is divided into two main stages, on site discard and post excavation processing.

3.6.7.1. 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 been 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).

3.6.7.2. Post excavation artefact 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 3.6.3 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 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 4 Artefact discard matrix

Diagnostic capacity	*P1 Contexts*	*P2 Contexts*	*P3 Contexts*
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)

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

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.

3.6.8. 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.

3.6.9. 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

This Historical Archaeology Research Design and Excavation Methodology (HARDEM) should be read with the Urbis (2025) Historical Archaeological Impact Assessment, 164-194 William Street Woolloomooloo, NSW (the HAIA).

This report recommends the following:

- The HAIA and the HARDEM need to be submitted via Major Projects as part of the Environmental Impact Statement (EIS) documentation in response to the Secretary's Environmental Assessment Requirements (SEARS) for the State Significant Development application SSD-80211463.
- Both documents should also be submitted for review and endorsement by Heritage NSW as agency advice for heritage management on behalf of the Minster for Planning.
- The implementation of the recommended archaeological methodologies cannot commence on site until the HARDEM has been endorsed by Heritage NSW.
- Archaeological monitoring and sampling will be staged with the demolition and bulk excavation program. Demolition down to slab level is permissible without archaeological involvement however any subsurface impacting works should be undertaken in consultation with the archaeological team per the methodology provided in this document.

5. REFERENCES

Archaeological Assessments Guidelines, Heritage Office, Department of Urban Affairs and Planning, 1996

Assessing Significance for Historical Archaeological Sites and 'Relics' Heritage Council of NSW, 2009

Heritage Council of NSW, New South Wales Historical Themes, 2001

Historical Archaeology Code of Practice, Heritage Council of NSW, 2006

Urbis (2025), Historical Archaeological Assessment 164-172 and 174-194 William Street, Woolloomooloo, NSW

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