

HISTORICAL ARCHAEOLOGICAL ASSESSMENT

74 Edinburgh Road
Marrickville NSW

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EXECUTIVE SUMMARY

Urbis have been engaged by Woolworths (the Proponent) to prepare an Historical Archaeological Assessment (HAA) at 74 Edinburgh Road, Marrickville, NSW for State Significant Development Application SSD-10468. Under SSD-10468, the proponent is seeking to demolish existing structures and construct a warehouse facility with multi-level parking.

This HAA has been prepared to respond to the Secretary's Environmental Assessment Requirements (SEARs) which stated:

14. Aboriginal and non-Aboriginal cultural heritage – including:

- Identification and assessment of potential impacts on Aboriginal cultural heritage values, including a description of any measures to avoid, mitigate and/or manage any impacts.*
- Justification for reliance on any previous Aboriginal Cultural Heritage Assessment Report or other heritage assessment for the site must be provided.*
- An assessment of potential impacts on State and local heritage items in the surrounding area.*

Aboriginal cultural heritage and built heritage are addressed in the Aboriginal Objects Due Diligence Assessment (ADD) and Heritage Impact Statement (HIS) appended to the Environmental Impact Statement (EIS).

The subject area is located at Lot 202 DP 1133999 and Lot 101 DP 1237269, 74 Edinburgh Road Marrickville, and encompasses an area of approximately 27,315m². The subject area is currently occupied by three factory buildings and carparking areas. The proposed development will involve the demolition of existing structures and construction of a warehouse facility.

This HAA has established that the proposal has:

- low potential to impact on State significant archaeological resources related to the early colonial occupation of the subject site and its industrial development throughout the late 19th century.
- low-moderate potential to impact on locally significant silt (air raid) trenches within the north-eastern portion of the subject site.
- moderate-high potential to impact on locally significant industrial waste incorporated within imported fill.
- moderate-high potential to impact on locally significant archaeological resources related to MML's lengthy occupation of the site.

With the exception of the silt (air raid) trenches, which can be located precisely in historical aerials (see Figure 16), the potential for the above identified historical archaeological resources is ubiquitous across the subject area.

Urbis makes the following recommendations in respect of the proposal:

Recommendation 1 –Archaeological Monitoring

Following the approval of the SSDA and parallel with the commencement of earthworks in areas of proposed bulk excavation and defined as having potential for archaeological resources, archaeological monitoring works should be undertaken to ensure no potential relics are harmed during the works. The monitoring will be applied to identify any potential relics during earthworks and will decide if sub-section 4 of the below detailed Chance Find Procedure is required.

Recommendation 2 – Archaeological Chance Find Procedure

In areas identified as having low potential for archaeological resources and for the construction of pylons, although considered highly unlikely, should any archaeological deposits be uncovered during any site works, a chance find procedure must be implemented. The following steps must be carried out:

1. All works stop in the vicinity of the find. The find must not be moved 'out of the way' without following the steps below.

2. Site supervisor, or another nominated site representative must contact either the project archaeologist (if relevant) or DPIE to contact a suitably qualified archaeologist.
3. The nominated archaeologist examines the find, provides a preliminary assessment of significance, records the item and decides on appropriate management.
4. Depending on the significance of the find, reassessment of the archaeological potential of the subject area and further archaeological investigation may be required in the form of test or salvage excavation.
5. Works in the vicinity of the find can only recommence upon relevant approvals from DPIE.

Recommendation 3 – Human Remains Procedure

In the unlikely event that human remains are uncovered during any site works, the following must be undertaken:

1. All works within the vicinity of the find immediately stop.
2. Site supervisor or other nominated manager must notify the NSW Police and DPIE.
3. The find must be assessed by the NSW Police, and may include the assistance of a qualified forensic anthropologist.
4. Management recommendations are to be formulated by the Police, DPIE and site representatives.
5. Works are not to recommence until the find has been appropriately managed.

1. INTRODUCTION

1.1. BACKGROUND

Urbis have been engaged by Woolworths (the Proponent) to prepare an Historical Archaeological Assessment (HAA) at 74 Edinburgh Road, Marrickville, NSW for State Significant Development Application SSD-10468. Under SSD-10468, the proponent is seeking to demolish existing structures and construct a warehouse facility with multi-level parking.

This HAA has been prepared to respond to the Secretary's Environmental Assessment Requirements (SEARs) which stated:

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- Identification and assessment of potential impacts on Aboriginal cultural heritage values, including a description of any measures to avoid, mitigate and/or manage any impacts.*
- Justification for reliance on any previous Aboriginal Cultural Heritage Assessment Report or other heritage assessment for the site must be provided.*
- An assessment of potential impacts on State and local heritage items in the surrounding area.*

Aboriginal cultural heritage and built heritage are addressed in the Aboriginal Objects Due Diligence Assessment (ADD) and Heritage Impact Statement (HIS) appended to the Environmental Impact Statement (EIS).

1.2. LOCATION AND DESCRIPTION OF THE SUBJECT AREA

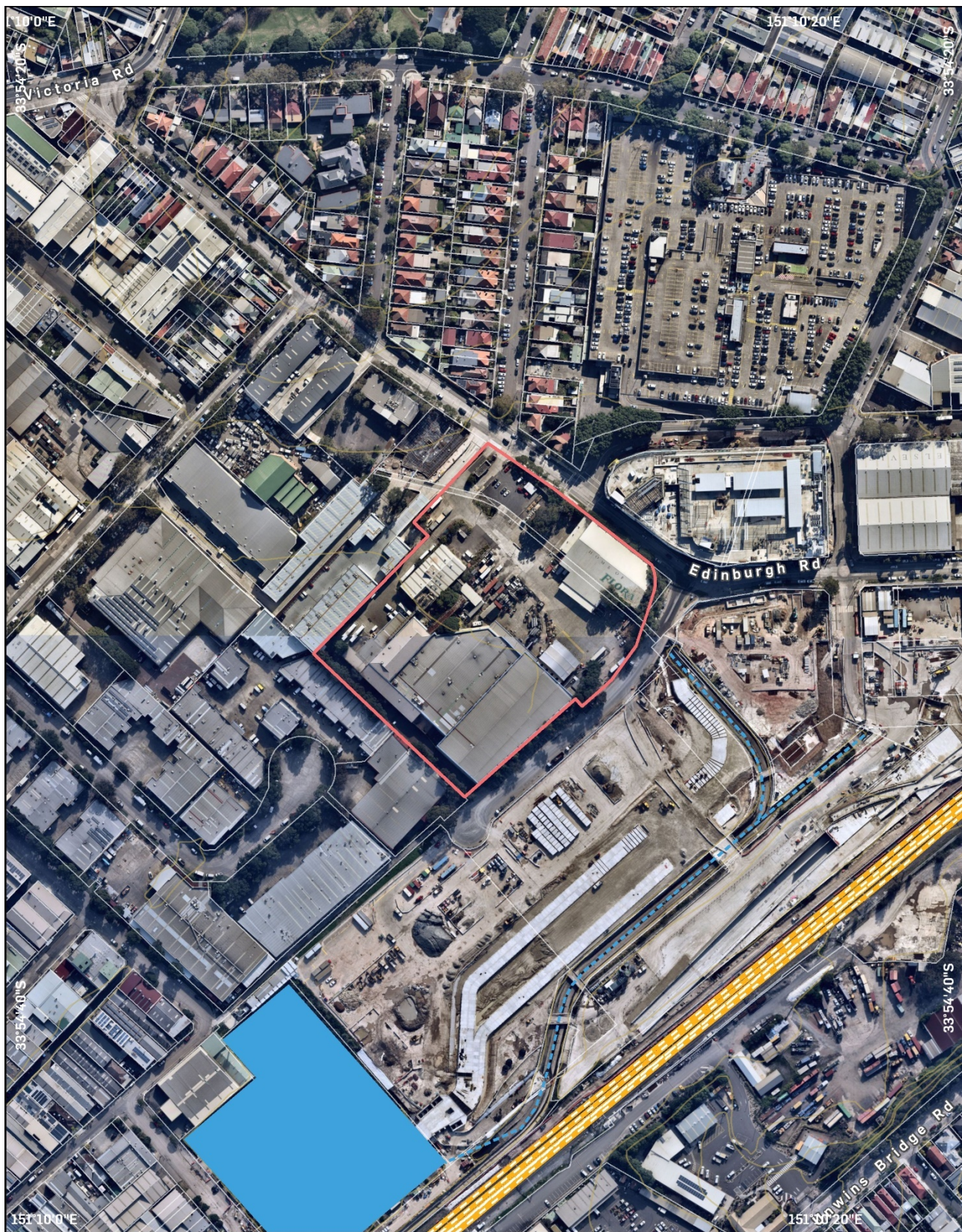
The subject area is located at Lot 202 DP 1133999 and Lot 101 DP 1237269, 74 Edinburgh Road Marrickville, and encompasses an area of approximately 27,315m². The subject area is currently occupied by three factory buildings and carparking areas. The site is bordered by other industrial lots to the east, south and west, with residential lots and commercial development across Edinburgh Road to the north.

The subject area is located within an established industrial area within the Sydenham Station Precinct, part of the Sydenham to Bankstown Urban Renewal Corridor.

1.3. PROPOSED DEVELOPMENT

The proposed development will involve the demolition of existing structures and construction of a warehouse facility to be in use on a 24-hour, 7-day basis. The proposal will involve the following:

- Demolition of the existing buildings, associated structures and landscaping.
- Construction of a two storey warehouse comprising two warehouses (Warehouse 1 at ground floor and Warehouse 2 above).
- Construction of associated offices across five levels to be used by the warehouse tenants.
- Two storey car park adjacent to Edinburgh Road.
- Two storey hardstand loading and delivery area adjacent Sydney Steel Road.
- Private vehicle access from two points on Edinburgh Road.
- Heavy vehicle / loading vehicle access from four points on Sydney Steel Road.



GDA 1994 MGA Zone 56

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Project No: P0026069

Project Manager: Andrew Crisp

▭ Subject Area
 — Contours
 ▭ Hydrology
 - - Ephemeral

SUBJECT AREA

74 Edinburgh Road, Marrickville
Woolworths

Figure 1 – heritage context of subject area

1.4. AUTHOR IDENTIFICATION AND METHODOLOGY

This HAA has been prepared by Meggan Walker (Consultant Archaeologist) and Alexandra Ribeny (Consultant Archaeologist). Balazs Hansel (Associate Director / Archaeologist) has reviewed and endorsed its content.

This HAA has been prepared in accordance with the following guidelines and documents:

- *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance* (2013).
- *The NSW Heritage Act 1977*.
- *The Heritage Manual* (1996).
- *Assessing Significance for Historical Archaeological Sites and 'Relics'* (2009).
- *Historical Archaeological Code of Practice, NSW Department of Planning* (2006).

1.5. LIMITATIONS

A site inspection has not been undertaken specifically for the preparation of this HAA.

This report is limited to a presentation and analysis of potential impacts on the historical archaeological (non-Aboriginal) potential only.

No intrusive archaeological methods including archaeological test excavation have been applied for the purposes of this report.

2. STATUTORY CONTEXT

2.1. NATIONAL LEGISLATION

2.1.1. Environment Protection and Biodiversity Conservation Act 1999

In 2004, a new Commonwealth heritage management system was introduced under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The National Heritage List (NHL) was established to protect places that have outstanding value to the nation. The Commonwealth Heritage List (CHL) was established to protect items and places owned or managed by Commonwealth agencies. The Australian Government Department of Sustainability, Environment, Water, Population and Communities (DSEWPC) is responsible for the implementation of national policy, programs and legislation to protect and conserve Australia's environment and heritage and to promote Australian arts and culture. Approval from the Minister is required for controlled actions which will have a significant impact on items and places included on the NHL or CHL.

The subject area is not included on the NHL or the CHL, and no historic heritage items in or within the vicinity of the subject area are listed on the NHL or the CHL.

2.2. STATE LEGISLATION

2.2.1. NSW Heritage Act 1977

The NSW Heritage Act 1977 (the Heritage Act) provides protection to items of environmental heritage in NSW. This includes places, buildings, works, relics, moveable objects and precincts identified as significant based on historical, social, aesthetic, scientific, archaeological, architectural, cultural or natural values. State significant items are listed on the NSW State Heritage Register (SHR) and are given automatic protection under the Heritage Act against any activities that may damage an item or affect its heritage significance.

2.2.2. State Heritage Register

The Heritage Act is administered by the Office of Environment and Heritage. The purpose of the Heritage Act 1977 is to ensure cultural heritage in NSW is adequately identified and conserved. Items of significance to the State of NSW are listed on the NSW State Heritage Register (SHR) under Section 60 of the Act.

A search of the SHR was undertaken on 18th August 2020. This search determined no items or objects within the subject area are listed on the State Heritage Register. The subject area is within proximity of the Sydenham Pit and Drainage Pumping Station, Station 1, SHR 01644.

2.2.3. Section 170 Heritage and Conservation Register

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

A search of the Section 170 Heritage and Conservation Register was undertaken on 18th August 2020. This search determined no items or objects within the subject area are listed on this register.

2.2.4. Historical Archaeology

Under Section 57(1) of the Heritage Act Heritage Council approval is required to move, damage, or destroy a relic listed in the State Heritage Register, or to excavate or disturb land which is listed on the SHR and there is reasonable knowledge or likelihood of relics being disturbed. The Act defines a 'relic' as:

Any deposit, object or material evidence

- (a) which relates to the settlement of the area that comprises New South Wales, not being an Aboriginal settlement, and;
- (b) which is 50 or more years old. A Section 60 application is required to disturb relics on an SHR listed site.

Under section 139 of the *Heritage Act*, an excavation permit is required to disturb or excavate land “*knowing or having reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed*”. This section of the Heritage Act identifies provisions for items /relics outside of those on the State Heritage Register or subject to an Interim Heritage Order (IHO).

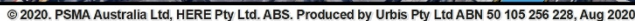
2.2.5. The Australian ICOMOS Burra Charter

While not a statutory document, the Australia ICOMOS Charter for the Conservation of Places of Cultural Significance (the Burra Charter) sets a standard of practice for those who provide advice, make decisions about, or undertake works to places of cultural significance including owners, managers, and custodians. The Burra Charter provides specific guidance for physical and procedural actions that should occur in relation to significant places, regardless of their legislative listing. The Burra Charter sets out a number of conservation principles for heritage places which are relevant to the project including use, setting, conservation, management and knowledge.

2.3. HERITAGE CONTEXT

The subject site is not heritage listed. The site is located within the vicinity of a small number of heritage items including the following items:

- Item 81 under the Marrickville LEP 2011, Flood storage reserve and brick drain (Sydenham Pit and Drainage Pumping Station 1) – also listed on the NSW State Heritage Register as SHR 01644
- Item 98 under the Marrickville LEP 2011, Brick paving.



Contours

74 Edinburgh Road, Marrickville
Woolworths

3. HISTORICAL OVERVIEW

The following history has been adapted from the HIS prepared by Urbis in August 2020, appended to the EIS.

Table 1 – historical overview

Year	Activity
1799	Thomas Moore receives Crown Grant, inclusive of the subject site (Figure 6 & Figure 7). The subject site was overgrown and swampy at this time. Moore was known to use his landholdings in Marrickville as a source of timber, with no built elements or agricultural endeavours known to have taken place on the site during this time.
1870-1903	Daniel Bulman purchased the site before selling to his business partner, Christopher Newton. Newton sold to the owners of Wright, Davenport and Co, who operated a tannery (Figure 3) from the main street frontage on Victoria Road. There is no evidence that the subject site was developed in this period but may have been used for the purposes of the tannery or as vacant land.
1897	The government drained the Gumbramorra Swamps, improving the area for the purposes of residential and industrial development.
1901	Portion of the site is resumed for drainage under the Public Works Act 1888, for drainage. This followed the draining of the Gumbramorra Swamps.
1903-1908	Ashton & Jagelmann Pottery operating on at least the eastern portion of the subject area.
1909 – 1911	James Brough Pottery (and tenants) operating on the eastern portion of subject area, south of stormwater easement (~3 acres).
1908 – 1940	Marrickville Margarine Company, Ltd (aka, Marrickville Margarine Ltd, Marrickville Holdings Limited, Nut Foods Ltd) operating on western portion of subject area (74 Edinburgh Rd). Marrickville Margarine was a notable company established in 1908 by Charles Abel as a response to butter shortages.
1913 – 1940	Richard Taylor Limited operating on the eastern portion of subject area, south of stormwater easement.
1940-1984	Marrickville Margarine Ltd (MML) operates from the subject site (Figure 9) and rents out eastern portion until c.1950s. Under the ownership of Marrickville Margarine, a number of buildings were constructed and demolished to suit the needs of the operation.
1940s	<p>During World War II, the north eastern portion of the subject site was used to house silt trenches. Should the factories or surrounding residential properties require evacuation due to an air raid, these trenches were intended to provide safety.</p> <p>The trenches are visible in the 1943 aerial (see Figure 10) but are no longer present by 1949 (see Figure 11), by which point the war had ended. By 1949 a number of buildings to the east of the site have been demolished.</p>
1950s	Development supporting the expansion of MML is evident across the site (Figure 12), with a number of buildings constructed across the eastern portion of the site and heavy earthworks to the south eastern portion visible.

Year	Activity
1980s	By the 1980s, the ETA warehouse had been constructed in the north-eastern portion of the subject site, and a number of buildings were constructed to the south east of the site where earthworks had previously been undertaken (Figure 13).
1990s	By the 1990s, Unilever owned the site. The sawtooth roofed building to the south of the ETA warehouse has been demolished and replaced by a carpark (Figure 14).



Figure 3 – Wright, Davenport & Co tannery operations in Marrickville, operating from the main frontage to Victoria Road but comprising some 13 acres of land, with intentions to redevelop portions for residential purposes.

Source: *Australian Town and Country Journal*, 17th October 1874, Pg. 21



Figure 4 – ETA factory buildings in the background, undated.

Source: *Inner West Library, Local History Collections*.



Figure 5 – ETA factory, Edinburgh Road, undated.

Source: *Inner West Library, Local History Collections*.

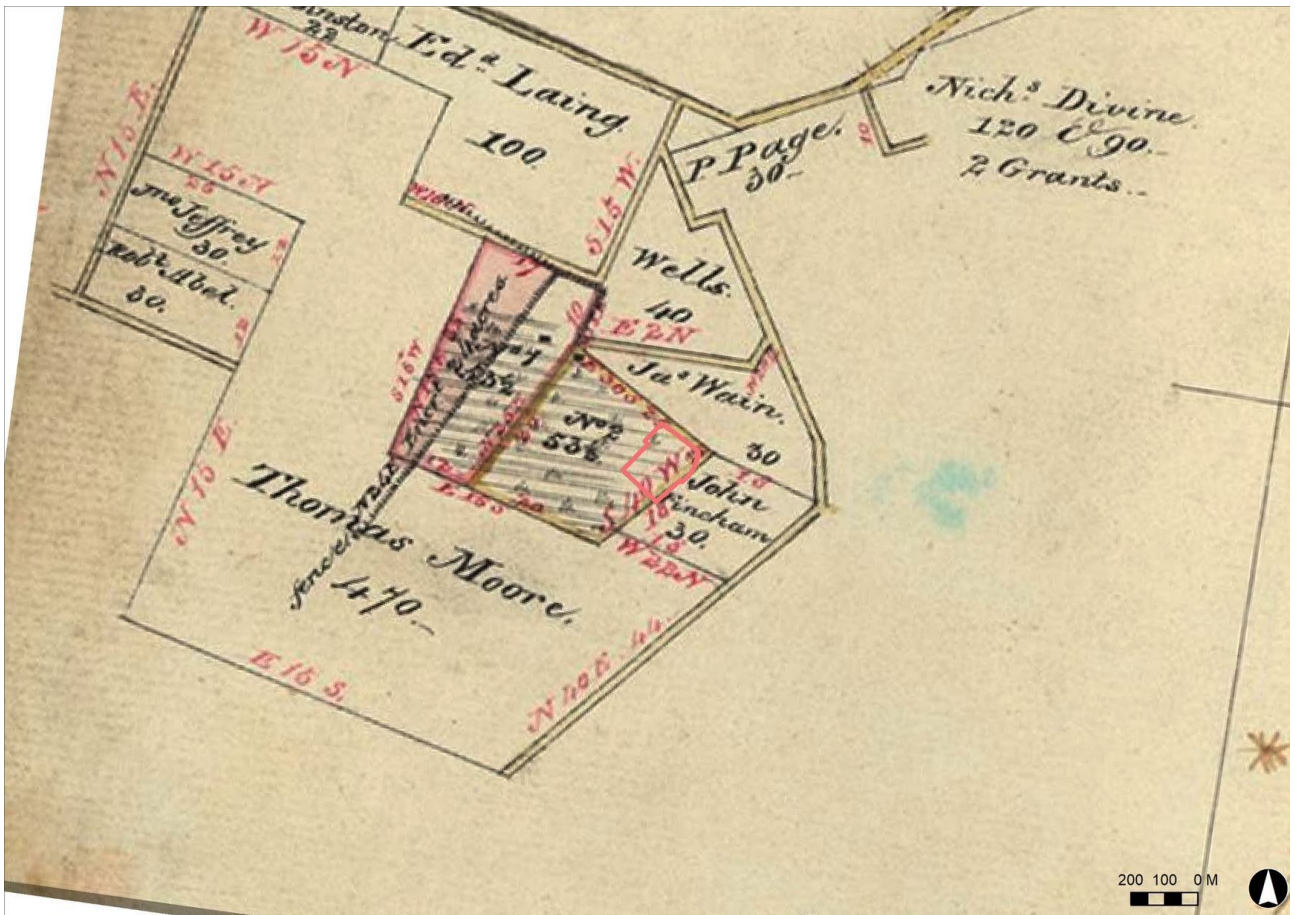


Figure 6 – 1831 surveyor sketch of the Gumbramorra Swamp area, showing the location of early land grants within the area.

Source: Surveyor General sketch book 1, folio 4, State Archives & Records

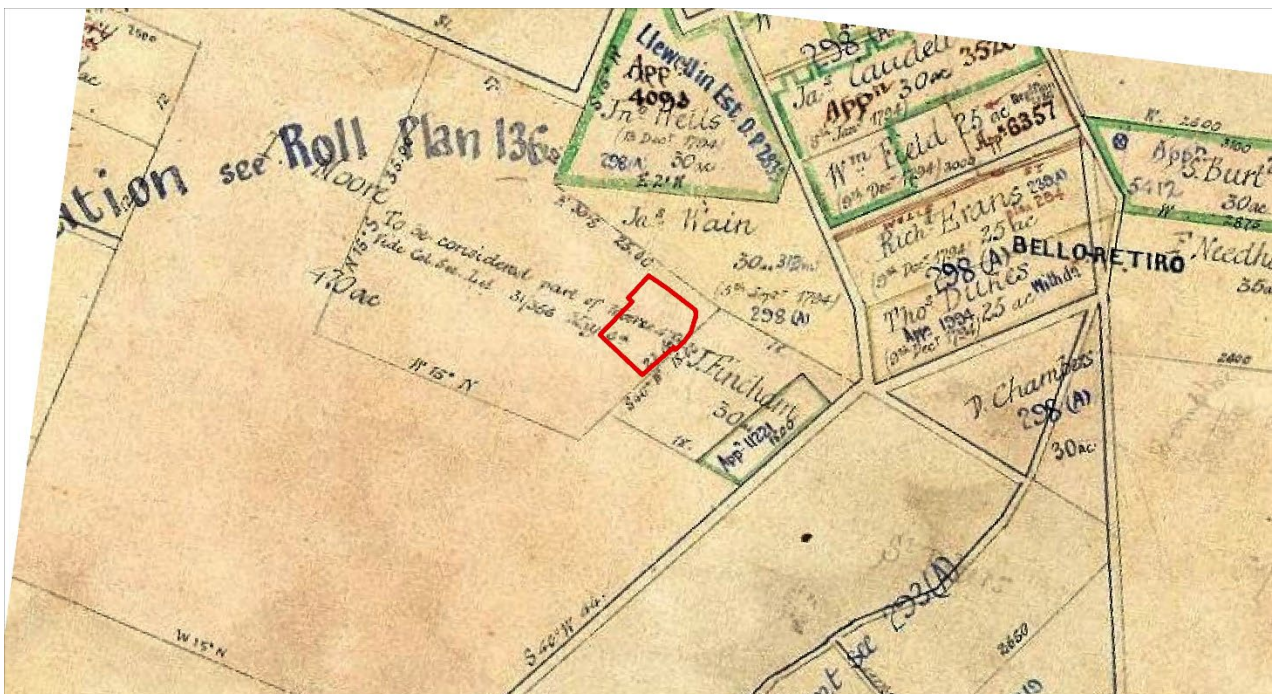


Figure 7 – undated Parish map, Parish of Petersham, County of Cumberland. Approximate location of the subject site indicated in red.

Source: Inner West Council Library Archives, Local History Collection, 228040



Figure 8 – c.1915, plan of Moore's Grant
Source: Inner West Library, Local History Collections.



Figure 9 – Map from the Public Works Department, 1873-1953, showing the buildings constructed on site, including the Marrickville Margarine Company identified as occupying the Edinburgh Road frontage.

Source: Sydney Water Archives, PWDS1544-S949

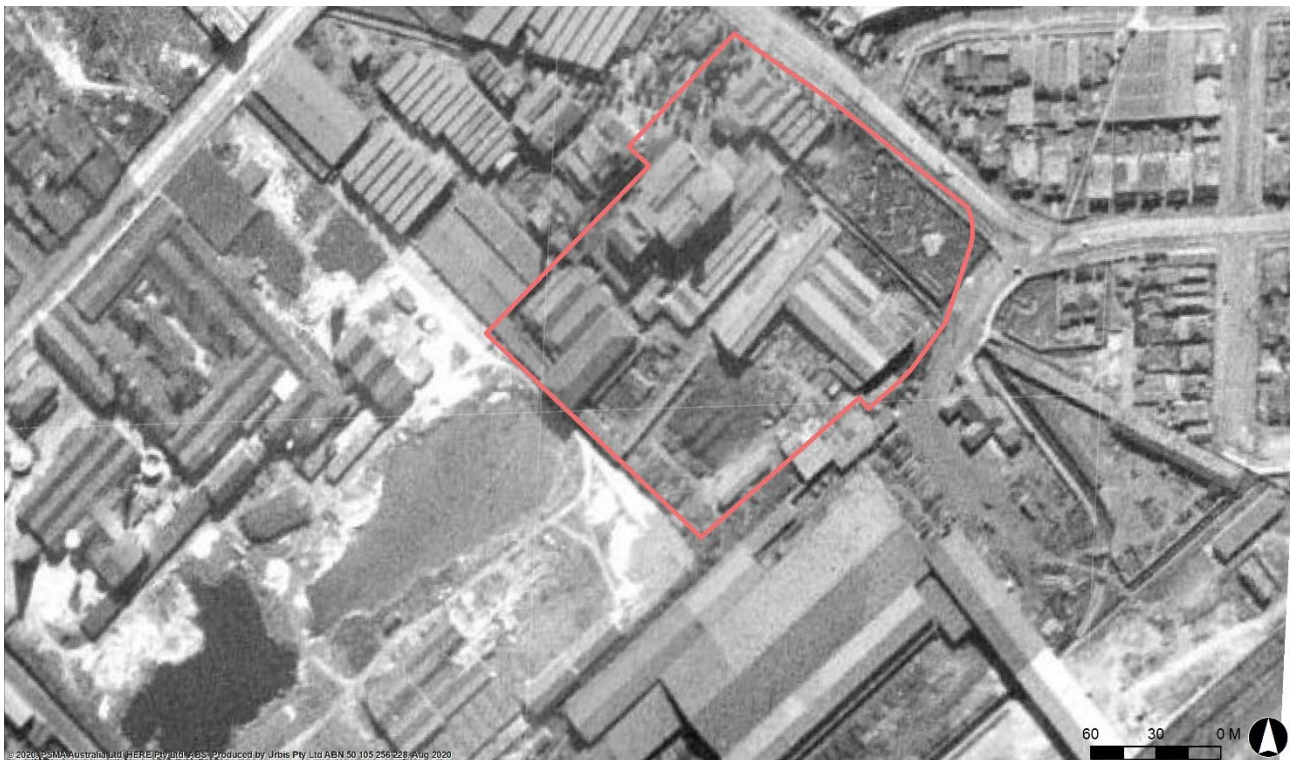


Figure 10 – 1943 aerial of Marrickville, with subject site indicated in red and silt trenches in the north eastern corner. Buildings include saw and tooth roofed factory buildings as well as brick office.

Source: Spatial Services Web Portal

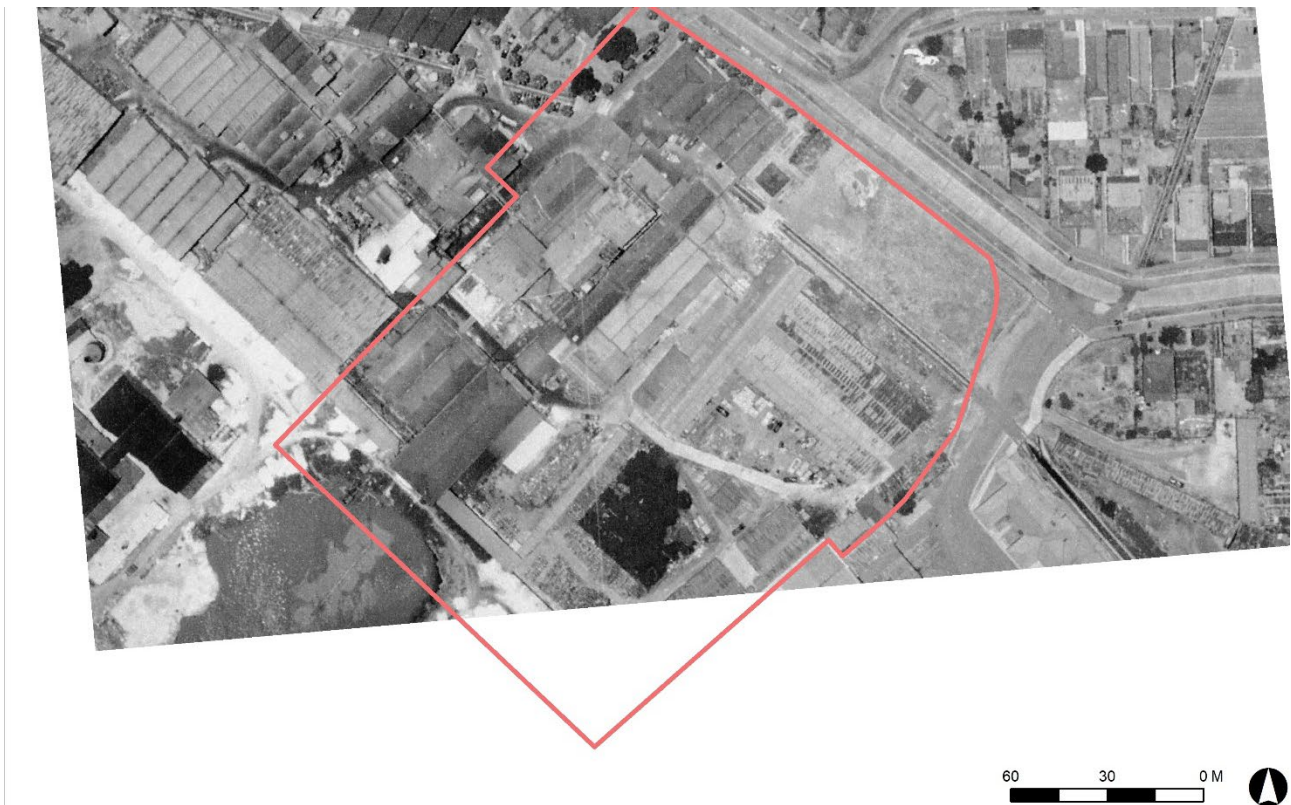


Figure 11 – 1949 aerial of Marrickville with subject site indicated in red and factory buildings along the western portion of site.

Source: Spatial Services Web Portal



Figure 12 – 1950s aerial of Marrickville with subject site indicated in red and new buildings across the site, including saw tooth roofed factory structures.

Source: Spatial Services Web Portal



Figure 13 – 1980s aerial of Marrickville, with subject site indicated in red and factory buildings across the site.

Source: Spatial Services Web Portal



Figure 14 – 1990s aerial of Marrickville, with demolished saw tooth roofed factory buildings and new buildings to the south.

Source: Spatial Services Web Portal

4. ARCHAEOLOGICAL CONTEXT

4.1. PREVIOUS ARCHAEOLOGICAL INVESTIGATIONS

The archaeological potential of the site not been assessed by any readily available archaeological assessments. Below, archaeological assessments of comparable and local sites are considered for their relevance to the current subject area.

Report	Summary	Relevance to the Subject Area
<p>AMAC, 2015, <i>Baseline Archaeological Assessment: 8 Yelverton Street, Sydenham NSW</i></p>	<p>In 2015 AMAC Group (AMAC) was engaged by Christian Moraitis to prepare a Baseline Archaeological Assessment (BAA) for the property at 8 Yelverton Street, Sydenham, which historically formed part of the 1830s Grove Estate. The BAA was commissioned as part of a proposal to demolish the rear of the existing dwelling on the site and construction of a new extension.</p> <p>Documentary evidence suggested that the homestead and outbuildings associated with the estate could be located within the curtilage of the site, however, it was considered more likely to be situated within the front yard of the former homestead. The potential for archaeological relics associated with The Grove was assessed as low, however, in the event that these were present, it was deemed likely that these would be impacted by the proposed development.</p>	<ul style="list-style-type: none"> ▪ Approximately 800m south of subject site ▪ Outlined potential for relatively minor works to impact on early 19th century archaeological resources
<p>GML, 2013, <i>549 Princes Highway, Tempe: Historical Archaeological Excavation Report</i></p>	<p>In 2013 GML was engaged by Mr John Vu to undertake archaeological investigations at 549 Princes Highway, Tempe. The archaeological investigation included monitoring of ground disturbance across the southern half of the allotment.</p> <p>A sandstone brick well was uncovered, and the contents were hand excavated down to a depth of 1270mm. Excavation ceased at this level due to the well narrowing at the top and deposits remained unexcavated therein. The fabric of the well revealed that it was constructed in the mid-19th century, which corroborates historical resources which suggested that it was constructed between 1854-1880 as part of Samuel Henry Terry's Marionette Estate. Artefacts recovered from the well dated to the late 19th – early 20th century. A house was constructed over the well in 1916 so it was determined that these artefacts were likely contaminants which were introduced in association with its construction.</p> <p>No evidence of the former gatekeeper's cottage was uncovered.</p>	<ul style="list-style-type: none"> ▪ Approximately 1.25km south of subject site ▪ Archaeological resources which relate to the early colonial period uncovered beneath early 20th century residential development

Report	Summary	Relevance to the Subject Area
GML, 2009, <i>549 Princes Highway, Tempe: Historical Archaeological Assessment and Research Design</i>	<p>In 2009 GML was engaged by Claims Management Australasia, on behalf of Marrickville City Council, to prepare an historical archaeological assessment of 549 Princes Highway, Tempe. The HAA was intended to both identify the historical archaeological potential of the site and document a well which had been previously recorded on the site.</p> <p>The HAA determined that the site was likely to contain a well which had been sunk between 1854-1880 as part of Samuel Henry Terry's Marionette Estate. The well was identified as having significance at a local level for its historical heritage values and research potential. It was further determined that the proposal was likely to expose, and potentially impact on, the remnants of the former gatekeeper's cottage. It was anticipated that these would consist of deeper subsurface deposits including brick footings, the former privy and associated fill.</p> <p>The HAA recommended that further archaeological investigations be undertaken in order to ensure that these historical archaeological resources be recorded prior to the works being undertaken.</p>	<ul style="list-style-type: none"> ▪ Approximately 1.25km south of subject site ▪ Potential for archaeological resources associated with early – mid-19th century occupation
Casey & Lowe, 2002, <i>Archaeological Management Plan: Tempe House and Grounds</i>	<p>In 2002 Casey & Lowe Associates (Casey & Lowe) was engaged by Tanner & Associates to prepare an AMP for Tempe House and grounds. The site is bounded by Lusty Street, the Illawarra Railway line, the Cooks River and the Princes Highway, Tempe.</p> <p>The AMP established that the site contains significant archaeological relics associated with Alexander Brodie Spark's construction of Tempe House between 1836-1856 and with the Sisters of the Good Samaritan who ran a women's refuge on the site from the 1880s. These archaeological resources were assessed as having significance at a local level.</p>	<ul style="list-style-type: none"> ▪ Approximately 2.4km south-west of subject site ▪ Identified archaeological resources associated with early – mid-19th century occupation
HLA-Envirosciences Pty Ltd, 1998, <i>An Archaeological Assessment of the Former Paint Factory</i>	<p>In 1998 HLA-Envirosciences Pty Ltd (HLA-Envirosciences) was engaged by Hoechst Australia to prepare an historical archaeological assessment for the proposed demolition of the former Hoechst paint factory and warehouse at 60-78 Princes Highway, St Peters. The works also included the removal of soil for remediation.</p>	<ul style="list-style-type: none"> ▪ Approximately 900m east of subject site ▪ Similar industrial context to subject site

Report	Summary	Relevance to the Subject Area
	<p>It was established that archaeological resources which predated the existing factory building would likely have been removed at the time of its construction. The historical archaeological potential of the site was therefore identified as low overall as it was confined to deeper deposits including cesspits, wells and tanks. The archaeological significance of these potential features was assessed as low.</p> <p>The impact of the proposal was assessed as low on the basis that it was unlikely to disturb significant archaeological resources.</p>	<ul style="list-style-type: none"> Construction of the extant factory would have removed most historical archaeological resources Archaeological potential confined to deeper / earlier deposits
<p>HLA-Envirosciences Pty Ltd, 1995, <i>An Archaeological Assessment of the Former Go-Gas Service Station, 140 Princes Highway, St Peters NSW</i></p>	<p>In 1995 HLA-Envirosciences Pty Ltd (HLA-Envirosciences) was engaged by The Shell Company of Australia (Shell) to prepare an historical archaeological assessment for the former Go-Gas Service Station site. During excavation works to remove underground storage tanks (USTs) the brick remnants of a well or tank were uncovered. Work was allowed to proceed, however, additional brick structures were encountered, at which time Marrickville Council determined that an archaeological assessment report should be prepared for the site.</p> <p>The HAA established that the underground installation of the USTs had resulted in a significant impact to the wells. It determined that there was potential for archaeological resources associated with:</p> <ul style="list-style-type: none"> Bardens shops and dwellings Whettons shop and dwellings St Peters Town Hall <p>As no further excavation works were required, no additional impacts to archaeological resources were identified.</p>	<ul style="list-style-type: none"> Approximately 900m south-east of subject site Similar industrial context to subject site 19th and 20th century archaeological resources intact beneath later industrial development

4.2. LOCAL HISTORICAL ARCHAEOLOGICAL CONTEXT

AMBS, 2017. Sydney Metro, City & Southwest Archaeological Method Statement for the Marrickville Dive Site.

In 2017 AMBS was commissioned by John Holland CPB Ghella Joint Venture (JHCPBG) to prepare an Archaeological Method Statement (AMS) for the Marrickville Dive site.

The Marrickville Dive site was one of a number of stations, shaft and dive sites which were selected as part of the Sydney Metro & City Southwest project; a 30km-long new rail system from Chatswood to Sydenham.

The Marrickville Dive site occupies an area bounded by the railway, Sydney Steel Street and Edinburgh Road. The site is located to the south-east of, and immediately adjacent to, the subject site (Figure 15).



Figure 15 – Location of Marrickville Dive site adjacent to the subject site (indicated with arrow)

Source: AMBS, 2017, Sydney Metro, City & Southwest Archaeological Method Statement for the Marrickville Dive Site, p.5

In respect of the Marrickville Dive site's archaeological potential, the AMS states the following:¹

The earliest use of lands in the Marrickville area was agricultural and pastoral from the early nineteenth century, with the study area remaining largely undeveloped until the Gumboramorra Swamp had been successfully drained in 1897. Although the local area underwent residential and industrial development during the later nineteenth century, it is not until the early nineteenth century that the study area was successfully developed for industrial and residential purposes.

The archaeological potential of early twentieth-century housing rarely reaches the threshold for local or state significance as they rarely yield significant artefact assemblages with an ability to add to local or state research themes. The provision of reticulated water, sewerage and

¹ AMBS, 2017, Sydney Metro, City & Southwest Archaeological Method Statement for the Marrickville Dive Site, pp.16-17

municipal garbage collection as well as tongue-and-groove flooring mean that wells, cesspits and underfloor deposits are generally absent (Heritage Branch 2009:18). In addition, structural remains of housing that may be present within the north-eastern area of the site will not contribute to an understanding of the urban development of the local area, and will not have research potential.

Although not specifically referred to in the sources, draining the Gumbramorra Swamp probably included reclamation to raise the level of the land above the swamp to make it habitable. As such, it is likely that the reclamation fills will include industrial waste derived, in particular, from the local brickworks and possibly from nearby Sydenham Pottery.

Recent excavations at Darling Quarter also identified recurrent phases of reclamation along the waterfront throughout the nineteenth century, which included industrial waste from adjacent industries, including the Gas Works (Casey & Lowe 2013:277). The Darling Quarter site was part of the primary harbour for Sydney's trade undergoing successive improvements which included successive reclamation events, culminating in the early twentieth-century reconstruction of the wharfage by the Sydney Harbour Trust.

A site at the head of the harbour at 14–28 Ultimo Road, Ultimo, was within swampy land that was not reclaimed until 1880-1883. Excavations of the reclamation fills showed it primarily comprised clays in which tip lines were clearly visible indicating that the fills had been brought in by barrow or cart-load. Within the fills were discrete pockets of waste derived from the NSW Shale and Oil Company, which had occupied the northern part of the site since the 1860s (Australian Museum Consulting, 2015: 53-54).

Below the reclamation 1880s reclamation fills and physical remains of 1850s occupation on Ultimo Road excavations exposed evidence of early land management with large unfinished Red River Gum trunks laid across the site, aligned with the property. The timbers may also have been laid to stabilise the swamp sands (Australian Museum Consulting, 2015: 42). Evidence of early landuse practices within the Gumbramorra Swamp are likely to be ephemeral, such as postholes defining fencelines and plough lines.

Recovery of industrial waste, including material derived from local brickworks and potteries, from the reclamation fills has the potential to add to our understanding of the workings of the local industries and would have low-moderate research potential. An understanding of the pre-reclamation Gumbramorra Swamp landscape, the original vegetation and later landuse practices would contribute to an understanding of early land use management practices and would have moderate research potential.

In respect of the Marrickville Dive site's archaeological significance, the AMS states the following:²

The archaeological resource associated with early land use practices and later reclamation within the footprint of the Marrickville dive site has the potential to demonstrate the past by making a contribution to an understanding of the land use practices within the Gumbramorra Swamp. Industrial waste, from brick and pottery manufacturing, may be included in the reclamation fills and have potential to provide information regarding the local industrial development of the area that may not be available from other sources. Information recovered from the reclamation fills and management of the swamp environment could be evaluated and compared with physical evidence from similar industrial sites and swampy environments and would therefore be representative of this type of site.

The archaeological resource associated with early land management and later reclamation within the footprint of the Marrickville dive site, if present, would have local significance.

The AMS contained a number of findings which are of relevance for the present assessment.

The historical development of the Marrickville Dive Site generally parallels that of the subject site, with the majority of development having taken place after 1897 when the swamp was drained and the land reclaimed

² AMBS, 2017, Sydney Metro, City & Southwest Archaeological Method Statement for the Marrickville Dive Site, p.20

in 1903. The archaeological potential of the 19th century occupation of the site is thus limited to archaeobotanical evidence for the purpose of reconstructing the pre-colonial landscape.

Based on a number of previous excavations (Casey & Lowe 2013, AMC 2015), AMBS identified the reclamation fill as having high potential to include industrial waste derived from either the local brickworks or Sydenham Pottery. The subject site is similarly comprised of imported fill which was deposited in association with the early 20th century land reclamations and it may therefore be inferred that this potential exists.

Where the Marrickville Dive Site deviates from the subject site is in the nature of its 20th century development, which was both residential and industrial.

4.3. SUMMARY

The above assessment of previous archaeological publications has established that there are few archaeological investigations which have been undertaken within proximity of the subject site.

These archaeological publications indicate that there is potential for archaeological resources associated with the early colonial occupation of the region, even where there has been a high degree of subsequent disturbance.

AMBS' findings in relation to the adjacent Marrickville Dive Site have relevance for the present assessment on the grounds that the site generally parallels the developmental history of the subject site. The prediction that industrial waste from adjacent industries is likely to be incorporated within the reclamation fill is therefore also applicable to the subject site.

5. ASSESSMENT OF HISTORICAL ARCHAEOLOGICAL POTENTIAL

5.1. DEFINITION AND TERMS

Historical archaeological potential is defined as:

The degree of physical evidence present on an archaeological site, usually assessed on the basis of physical evaluation and historical research (Heritage Office and Department of Urban Affairs and Planning 1996).

Archaeological research potential of a site is the extent to which further study of relics likely to be found is expected to contribute to improved knowledge about NSW history which is not demonstrated by other sites, archaeological resources or available historical evidence. The potential for archaeological relics to survive in a particular place is significantly affected by later activities that may have caused ground disturbance. These processes include the physical development of the site (for example, phases of building construction) and the activities that occurred there. The archaeological potential of The Site is assessed based on the background information presented in Section 3, and graded as per:

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

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

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

5.2. POTENTIAL ARCHAEOLOGICAL RESOURCES

The following Table (Table 2) outlines the potential archaeological resources and overall archaeological potential associated with each phase of the subject area's development.

Table 2 – Assessment of Archaeological Potential

Phase	Summary	Archaeological Resources	Potential
Early Land Grants 1799 - 1870	Thomas Moore receives Crown Grant, inclusive of the subject site. The subject site was overgrown and swampy at this time. Moore was known to use his landholdings in Marrickville as a source of timber, with no built elements or agricultural endeavours known to have taken place on the site during this time.	Archaeological resources from this period may include evidence of the original land management practices prior to the swamps being drained in 1897 including plough lines, fence lines and postholes. It may also include evidence for early timber farming practices in the colony in the form of discarded or lost tools.	Low: Subsequent disturbance and earthworks are likely to have removed archaeological resources, however, imported fill may have preserved these features in situ. High: Archaeobotanical evidence is likely to survive in association within alluvial deposits.
Wright, Davenport and Co. Tannery 1870 - 1903	Daniel Bulman purchased the site before selling to his business partner, Christopher Newton. Newton sold to the owners of Wright, Davenport and Co, who operated a tannery to the west of the subject site at the main street frontage on Victoria Road. There is no evidence that the subject site was developed in this period but may have been used for the purposes of the tannery or as vacant land.	Archaeological resources from this period may include evidence of the operations of Wright, Davenport and Co, notable tanners in the Sydney area. This may include refuse from the tannery operations, tanning pits, structural remains from tannery outbuildings or cottages built for residential purposes for tannery employees.	Moderate – High: Previous excavations (Casey & Lowe 2013, AMC 2015) have identified industrial waste from adjacent industries within imported fill. Low: In situ archaeological resources unlikely to be located within the subject site, however, these may be located beneath imported fill.
Draining of Gumbramorra Swamps 1897	The government drained the Gumbramorra Swamps, improving the area for the purposes of residential and industrial development.	Archaeological resources from this period may include evidence of land reclamation efforts in the form of faunal and archaeobotanical evidence.	High: Faunal and archaeobotanical evidence is likely to be present at level of former swamps beneath imported fill.
Resumptions 1901	Portion of the site is resumed for drainage under the Public Works Act 1888, for drainage. This followed the draining of the Gumbramorra Swamps.	Archaeological resources from this period may include industrial waste from adjacent	Moderate – High: Previous excavations (Casey & Lowe 2013, AMC 2015) have identified high potential for industrial waste from

Phase	Summary	Archaeological Resources	Potential
		industries which was incorporated within imported fill.	adjacent industries to be incorporated within imported fill.
Ashton & Jagelmann Pottery Company 1903 – 1908	Ashton & Jagelmann Pottery operates on at least the eastern portion of the subject area.	Archaeological resources from this period may include refuse from pottery production including wasters and pottery sherds and structural remains from machinery, kilns and outbuildings which may have been located across the site.	Moderate – High: Previous excavations (Casey & Lowe 2013, AMC 2015) have identified industrial waste from adjacent industries within imported fill. Low: In situ archaeological resources unlikely to be located within the subject site, however, these may be located beneath imported fill.
James Brough Pottery 1909 – 1911	James Brough Pottery (and tenants) operating on the eastern portion of site, south of stormwater easement (~3 acres)	Archaeological resources from this period may include refuse from pottery production including wasters and pottery sherds and structural remains from machinery, kilns and outbuildings which may have been located across the site.	Moderate – High: Previous excavations (Casey & Lowe 2013, AMC 2015) have identified industrial waste from adjacent industries within imported fill. Low: In situ archaeological resources unlikely to be located within the subject site, however, these may be located beneath imported fill.
Marrickville Margarine Ltd (MML) 1908 - 1940	Marrickville Margarine Company, Ltd (aka, Marrickville Margarine Ltd, Marrickville Holdings Limited, Nut Foods Ltd) operating on western portion of site (74 Edinburgh Rd).	Archaeological resources from this period include general discard items, as well as structural remains resulting from the various additions and alterations which	Moderate: Archaeological resources from this period are likely to have been removed through subsequent development of the site, however,

Phase	Summary	Archaeological Resources	Potential
		have occurred across the site to accommodate the operations of MML.	structural remains may survive beneath later development.
Richard Taylor Ltd Concrete Works 1913 - 1940	Richard Taylor Limited operates on the eastern portion of the subject area, south of the stormwater easement. Operates from a concrete and reinforced concrete building.	Archaeological resources from this period may include refuse from lime production including deposits of limestone and quicklime, general discard items and structural remains from machinery, kilns and outbuildings which may have been located across the site.	Moderate: Archaeological resources from this period are likely to have been removed through subsequent development of the site, however, structural remains may survive beneath later development.
Marrickville Margarine Ltd (MML) 1940 - 1984	Marrickville Margarine Ltd (MML) operates from the subject site and rents out eastern portion until c. 1950s. Marrickville Margarine were a notable company established in 1908 on Edinburgh Road, presumably further to the west, by Charles Abel as a response to butter shortages. Under the ownership of Marrickville Margarine, a number of buildings were constructed and demolished to suit the needs of the operation. Factory buildings were constructed along the western portion of the site.	Archaeological resources from this period include general discard items, as well as structural remains resulting from the various additions and alterations which have occurred across the site to accommodate the operations of MML.	Moderate: Archaeological resources from this period are likely to have been removed through subsequent development of the site, however, structural remains may survive beneath later development.
Silt trenches 1940s	<p>During World War II, the north eastern portion of the subject site was used to house silt trenches. Should the factories or surrounding residential properties require evacuation due to an air raid, these trenches were intended to provide safety.</p> <p>The trenches are visible in the 1943 aerial (see Figure 10) but appear to have been backfilled by 1949 (see Figure 11). By 1949 a number of</p>	There is moderate archaeological potential associated with the silt trenches once present within the subject site. The backfilling of these trenches in the period between 1945-1949 may have resulted in the deposition of archaeological materials including general discard items, and construction and demolition debris from surrounding developments.	High: Previous archaeological investigations, including those undertaken for the Sydney Light Rail Project (2017), have unearthed air raid trenches with a high degree of integrity. Archaeological resources which are contemporary with the obsolescence of the trenches are

Phase	Summary	Archaeological Resources	Potential
	buildings to the east of the site had been demolished.		likely to be incorporated within the fill.
Expansion of MML 1950s	Development supporting the expansion of MML is evident across the site, with a number of buildings constructed across the eastern portion of the site and heavy earthworks within the south-eastern portion. Ancillary structures had been erected at the location of the former air raid trenches.	Archaeological resources from this period include general discard items, as well as structural remains resulting from building programs associated with the MML operations.	Moderate - High: Archaeological resources from this period are likely to have been removed through subsequent development of the site, however, structural remains may survive beneath later development. A number of structures from this period remain extant.
ETA Warehouse 1980s	By the 1980s, the ETA warehouse had been constructed in the north-eastern portion of the subject site. The majority of the subject site is occupied by warehouse structures at this time, with the exception of the south-eastern boundary where earlier structures had been demolished in order to create a dirt road. A number of buildings were constructed to the south east of the subject site where earthworks had previously been undertaken.	Archaeological resources from this period include general discard items, as well as structural remains resulting from building programs associated with the MML operations.	Moderate - High: Archaeological resources from this period are likely to have been removed through subsequent development of the site, however, substantial structural remains associated with earlier warehouses may survive beneath later development. A number of structures from this period remain extant.
Unilever 1990s	By the 1990s, Unilever owned the site. The sawtooth roofed building to the south of the ETA warehouse has been demolished and replaced by a carpark. The south-western boundary of the subject site had been overlaid with asphalt for parking purposes.	Archaeological resources from this period include general discard items, as well as structural remains and demolition materials.	High: Structures associated with this period of the site's occupation remain extant.

5.3. SUMMARY OF ARCHAEOLOGICAL POTENTIAL

The above assessment of historical archaeological potential has established that the subject site was originally incorporated within Thomas Moore's 1799 Crown grant. The subject site was comprised of swampland and was thus used principally for timber farming. There is therefore low-moderate potential for the survival of archaeological resources associated with early land management and timber farming practices beneath levels of imported fill.

Between 1870-1903 a tannery operated by Wright, Davenport and Co. occupied the land to the west of the subject site. The swamps were drained in 1895 and land reclamation commenced in 1903. Between 1903 - 1911 pottery works were established within the eastern portion of the subject area. Previous archaeological investigations (Casey & Lowe 2013, AMC 2015) have identified the presence of industrial waste from adjacent industries within imported fill. There is therefore moderate-high potential for archaeological resources associated with these industries, including pottery sherds, wasters and tannery implements, within early 20th century fill deposits. Although it is unlikely that the subject site was developed in association with the former tannery and pottery company, there is low potential for the presence of in situ archaeological resources including remnant pottery kilns, tanning pits, irrigation features and structural remains from machinery and outbuildings which may have been located across the site.

Between 1925-1937 Richard Taylor Ltd concrete works operated from the subject site. The precise configuration of buildings across the site is unclear, however, it has been established that it contained a reinforced concrete building. The majority of archaeological resources associated with the concrete works is likely to be comprised of industrial waste including limestone and quicklime deposits. There is some potential for the survival of structural remains from machinery, kilns and outbuildings.

From 1908-1984 Marrickville Margarine Ltd (MML) partially, and later wholly, occupied the subject site. By the 1940s factory buildings had been constructed along the western portion of the site and by the 1950s additional buildings occupied the eastern portion. Archaeological resources from this period include general discard items, as well as structural remains resulting from the various additions and alterations which have occurred across the site to accommodate the operations of MML. Given the substantial nature of these buildings, there is moderate-high potential for structural remains resulting from the various additions and alterations which have occurred across the site to accommodate MML's operations. A number of structures remain extant.

Under the occupation of MML in the 1940s, the north eastern portion of the subject site was used to house silt (air raid) trenches, which appear to have been backfilled by 1949. Previous archaeological investigations, including those undertaken for the Sydney Light Rail Project (2017), have unearthed air raid trenches with a high degree of integrity and it is therefore anticipated that this may apply in this circumstance. Archaeological resources which are contemporary with the obsolescence of the trenches are also likely to be incorporated within the fill.

By the 1980s, the ETA warehouse had been constructed in the north-eastern portion of the subject site. The majority of the subject site is occupied by warehouse structures at this time. In the 1990s, Unilever took over ownership of the site. The sawtooth roofed building to the south of the ETA warehouse was demolished and replaced by a carpark and buildings along the south-western boundary of the site had been cleared for additional parking facilities. Foundations of these structures may survive beneath the asphalt and concrete carpark surfaces. The majority of structures which relate to this period remain extant.

6. ARCHAEOLOGICAL SIGNIFICANCE

6.1. DEFINITION AND TERMS

The concept of archaeological significance is independent of archaeological potential. For example, there may be 'low potential' for certain relics to survive, but if they do, they may be assessed as being of 'high (State) significance'.

Archaeological significance has long been accepted as linked directly to archaeological (or scientific) research potential: a site or resource is said to be scientifically significant when its further study may be expected to help answer questions. Whilst the research potential of an archaeological site is an essential consideration, it is one of a number of potential heritage values which a site or 'relic' may possess. Recent changes to the Heritage Act 1977 (Section 33(3) (a)) reflect this broader understanding of what constitutes archaeological significance by making it imperative that more than one criterion be considered.

The below assessment of archaeological significance considers the criteria, as outlined in the NSW Heritage Branch publication *Assessing Significance for Historical Archaeological Sites and 'Relics'*. Sections which are extracted verbatim from this document are italicized.

For the purposes of this assessment, significance is ranked as follows:

- **No Significance** – it is unlikely that any archaeological materials recovered will be attributed significance in accordance with the assessment criteria on a state or local level.
- **Low/Local Significance** – it is likely that archaeological materials recovered will be significant on a local level in accordance with one or more of the assessment criteria.
- **High/State Significance** – it is likely that archaeological materials recovered will be significant on a state level in accordance with one or more of the assessment criteria.

6.2. ASSESSMENT OF SIGNIFICANCE

Archaeological Research Potential (current NSW Heritage Criterion E).

Archaeological research potential is the ability of archaeological evidence, through analysis and interpretation, to provide information about a site that could not be derived from any other source and which contributes to the archaeological significance of that site and its 'relics'.

Archaeological resources associated with Thomas Moore 1799 Crown grant (or Dr Wardell's subsequent period of ownership) could provide information in relation to land management and timber farming practices within the early colony. Analysis of archaeobotanical evidence could yield information in relation to the composition of the thick vegetation cover which historical sources describe as being characteristic of the Marrickville area throughout the 1800s.

Industrial waste associated with the early-20th century pottery works could yield information in relation to the composition and source of clay which was being used for pottery manufacture. Although unlikely to be present on the subject site, in situ archaeological resources including remnant tanning pits, irrigation features, kilns, machinery and structural remains from the former tannery or pottery company could reveal aspects of the scale and nature of these operations which cannot be elucidated through historical sources.

Evidence of additions and alterations across the subject site associated with MML's lengthy period of occupation (1908-1984) may reveal the adaptations and changes to the site in association with the company's evolving operations.

Remnant 1940s silt (air raid) trenches located within the north-eastern portion of the subject site could be investigated for the purpose of identifying construction techniques and their physical relationship to contemporary adjacent structures. Comparisons could also be made with other trenches which have been exposed through archaeological investigations throughout New South Wales. Archaeological resources incorporated within the fill may provide historical context to the trenches' obsolescence.

Associations with individuals, events or groups of historical importance (NSW Heritage Criteria A, B & D).

Archaeological remains may have particular associations with individuals, groups and events which may transform mundane places or objects into significant items through the association with important historical occurrences.

No potential archaeological resources have been identified which satisfy this criteria.

Aesthetic or technical significance (NSW Heritage Criterion C).

Whilst the technical value of archaeology is usually considered as 'research potential' aesthetic values are not usually considered to be relevant to archaeological sites. This is often because until a site has been excavated, its actual features and attributes may remain unknown. It is also because aesthetic is often interpreted to mean attractive, as opposed to the broader sense of sensory perception or 'feeling' as expressed in the Burra Charter. Nevertheless, archaeological excavations which reveal highly intact and legible remains in the form of aesthetically attractive artefacts, aged and worn fabric and remnant structures, may allow both professionals and the community to connect with the past through tangible physical evidence.

The former silt (air raid) trenches located within the north-eastern component of the subject site, if exposed, would likely retain a high degree of integrity and would appear as a dramatic landscape feature which relates to the WWII occupation of the site.

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

Archaeological remains have an ability to demonstrate how a site was used, what processes occurred, how work was undertaken and the scale of an industrial practice or other historic occupation. They can demonstrate the principal characteristics of a place or process that may be rare or common.

Archaeobotanical evidence which relates to the early colonial occupation of the subject site could reveal the rate and scale of land clearance which was associated with the timber farming industry.

Archaeological resources associated with the former tannery and pottery works may provide evidence of Marrickville's early industrial history and utilisation of the swamplands.

Evidence of additions and alterations across the subject site associated with MML's lengthy period of occupation (1908-1984) may reveal the changing composition of the site in response to the company's evolving operations.

Table 3 – assessment of significance

Criterion	Potential Archaeological Resources	Significance
E	Fences, plough lines and fence lines as evidence of 19 th century land management and timber farming practices.	High / State
	Archaeobotanical evidence as evidence of the composition of indigenous forests.	Moderate / Local
	Industrial waste, including pottery sherds and wasters, as evidence of early 20 th century pottery manufacture and clay sourcing.	Moderate / Local
	Remnants of the early 20 th century pottery works including remnant kilns, machinery, services, irrigation features and structural remains.	High / State

Criterion	Potential Archaeological Resources	Significance
	Evidence of additions and alterations across the subject site associated with MML's lengthy period of occupation (1908-1984).	Low-Moderate / Local
	Remnant 1940s silt (air raid) trenches located within the north-eastern portion of the subject site as evidence of their construction techniques and utilisation.	High / Local
	Archaeological resources incorporated within the fill of the 1940s trenches as an historical 'marker' of their obsolescence.	High / Local
A, B & D	N/A	N/A
C	Remnant 1940s silt (air raid) trenches located within the north-eastern portion of the subject site as a high integrity archaeological feature.	High / Local
A, C, F & G	Archaeobotanical evidence which relates to the 19 th century occupation of the subject site as evidence of the rate and scale of land clearance which was associated with the timber farming industry.	Moderate / Local
	Archaeological resources associated with the former tannery and pottery works as evidence of Marrickville's early industrial history and utilisation of the swamplands.	High / State
	Evidence of additions and alterations across the subject site associated with MML's lengthy period of occupation (1908-1984) may reveal the changing composition of the site in response to the company's evolving operations.	Low-Moderate / Local

6.3. STATEMENT OF ARCHAEOLOGICAL SIGNIFICANCE

The subject site has moderate-high potential to contain archaeological resources which reflect 150 years of industrial history.

Archaeological resources dating to the 19th century, including remnant fence lines, plough lines and postholes, could provide information in relation to land management and timber farming practices within the early colony and could have significance at a State level. Analysis of archaeobotanical evidence has the potential to yield information in relation to the composition of the thick vegetation cover which was characteristic of the Marrickville area throughout the 1800s as well as the rate and scale of land clearance which took place in association with the timber farming industry.

Archaeological resources associated with the former tannery, pottery company and concrete works may provide evidence of Marrickville's early industrial history. Industrial waste associated with these industries incorporated within reclamation fill could reveal contemporary use of materials and techniques. In situ archaeological resources including remnant tanning pits, irrigation features, kilns, machinery and structural remains could reveal information in relation to the scale and nature of these industries which cannot be elucidated through historical sources. Should such subsurface resources be present, these could have significance at a State level.

Evidence of additions and alterations across the subject site associated with MML's lengthy period of occupation (1936-1984) may reveal the changing composition of the site in response to the company's evolving operations and may have significance at a local level.

Remnant 1940s silt (air raid) trenches located within the north-eastern portion of the subject site could be investigated for the purpose of identifying construction techniques or for the purpose of drawing comparisons with other silt trenches which have been exposed throughout New South Wales. If exposed, the trenches would likely retain a high degree of integrity. The trenches have significance at a local level. Archaeological resources incorporated within the fill of the trenches may provide historical context to the trenches' obsolescence and may have significance at a local level.

7. ARCHAEOLOGICAL IMPACT ASSESSMENT

The proposal seeks the demolition of existing structures and landscaping across the subject site and construction of a two-storey warehouse facility. A two-storey car park would be constructed adjacent to Edinburgh Road and a two-storey hardstand loading and delivery area adjacent to Sydney Steel Road.

Bulk excavation works would be located within the northern and south-western components of the subject area in association with the flood storage area and OSD tanks. The precise depth of excavation works has not been provided, however, appears to be approximately 4.5 metres based on the *Typical underground OSD and flood plain excavation extent* section in Figure 17. Box culverts would be installed along the north-western boundary of the site and columns with pile caps across the majority of the subject area. Landscaping would also be undertaken along the north-eastern and south-eastern boundaries.

Geotechnical information from boreholes placed in the nearby Murray Street road easement and the Edgeware Road easement revealed a soil profile consisting of between 0.7–1.3 m of fill overlying a 0.6 m of thick silty clay alluvium layer, which overlies residual sediments to a depth of 7.5 m.

State significant archaeological resources related to the early colonial occupation of the subject site and its industrial development throughout the late 19th century, if present, would be located beneath imported fill associated with the early 20th century land reclamations. While the potential for archaeological resources associated with this period is identified as low, any works which involve excavation at a depth greater than 0.7-1.3m may impact on State-significant archaeological resources.

The greatest identified impact of the proposal, however, relates to those archaeological resources which were deposited following the drainage and subsequent reclamation of the swampland. This includes industrial waste which was potentially incorporated within the reclamation fill, and which may have significance at a local level for its ability to yield information in relation to the early industrial development of the Marrickville area. The potential for industrial deposits within the fill layer is ubiquitous across the subject area. Excavation works associated with the proposal are also likely to encounter structural remains associated with MML's lengthy occupation of the site (1908-1984). Such archaeological resources may have local significance for their ability to demonstrate the evolution of the company's operations.

In addition to the above, the silt (air raid) trenches located within the north-eastern portion of the subject site are identified as having high potential on the basis of previous archaeological investigations which have uncovered similar features with a high degree of integrity. Archaeological resources incorporated within the fill of the trenches may also provide historical context to their obsolescence. Excavation works within proximity of this feature include the installation of columns with pile caps at regular intervals and landscaping works (Figure 16). While these works are relatively superficial and the trenches are likely to be located beneath later fill deposits, there is potential to impact on these historical archaeological resources.



Figure 16 - Location of former silt (air raid) trenches (indicated with arrow) relative to proposed works

Source: SIX Maps 2020; Overlay – Richmond + Ross, August 2020

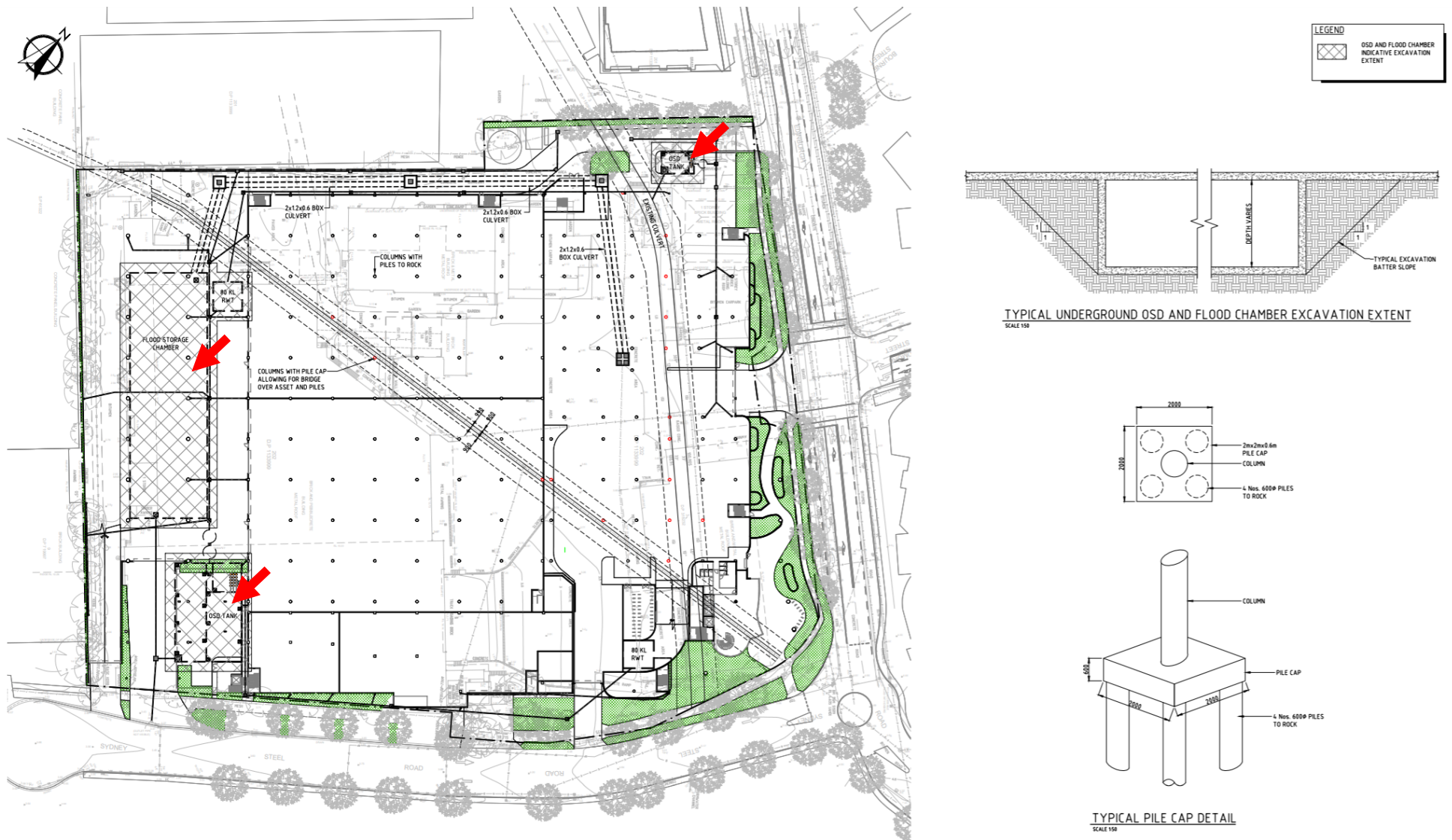


Figure 17 – Excavation extent plan. Note the proposed bulk excavation areas marked by the red arrows.

Source: Richmond + Ross, August 2020

8. CONCLUSIONS AND RECOMMENDATIONS

8.1. CONCLUSIONS

The above archaeological impact assessment has established that the proposal has:

- low potential to impact on State significant archaeological resources related to the early colonial occupation of the subject site and its industrial development throughout the late 19th century.
- low-moderate potential to impact on locally significant silt (air raid) trenches within the north-eastern portion of the subject site.
- moderate-high potential to impact on locally significant industrial waste incorporated within imported fill.
- moderate-high potential to impact on locally significant archaeological resources related to MML's lengthy occupation of the site.

With the exception of the silt (air raid) trenches, which can be located precisely in historical aerials (see Figure 16), the potential for the above identified historical archaeological resources is ubiquitous across the subject area.

8.2. RECOMMENDATIONS

Urbis makes the following recommendations in respect of the proposal:

Recommendation 1 –Archaeological Monitoring

Following the approval of the SSDA and parallel with the commencement of earthworks in areas of proposed bulk excavation and defined as having potential for archaeological resources, archaeological monitoring works should be undertaken to ensure no potential relics are harmed during the works. The monitoring will be applied to identify any potential relics during earthworks and will decide if sub-section 4 of the below detailed Chance Find Procedure is required.

Recommendation 2 – Archaeological Chance Find Procedure

In areas identified as having low potential for archaeological resources and for the construction of pylons, although considered highly unlikely, should any archaeological deposits be uncovered during any site works, a chance find procedure must be implemented. The following steps must be carried out:

1. All works stop in the vicinity of the find. The find must not be moved 'out of the way' without following the steps below.
2. Site supervisor, or another nominated site representative must contact either the project archaeologist (if relevant) or DPIE to contact a suitably qualified archaeologist.
3. The nominated archaeologist examines the find, provides a preliminary assessment of significance, records the item and decides on appropriate management.
4. Depending on the significance of the find, reassessment of the archaeological potential of the subject area and further archaeological investigation may be required in the form of test or salvage excavation.
5. Works in the vicinity of the find can only recommence upon relevant approvals from DPIE.

Recommendation 3 – Human Remains Procedure

In the unlikely event that human remains are uncovered during any site works, the following must be undertaken:

1. All works within the vicinity of the find immediately stop.
2. Site supervisor or other nominated manager must notify the NSW Police and DPIE.
3. The find must be assessed by the NSW Police, and may include the assistance of a qualified forensic anthropologist.
4. Management recommendations are to be formulated by the Police, DPIE and site representatives.

5. Works are not to recommence until the find has been appropriately managed.

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