

**80-88 REGENT STREET,
REDFERN**

**HISTORICAL
ARCHAEOLOGICAL
ASSESSMENT**

10 AUGUST 2018
SH1461
PREPARED FOR IGLU PTY LTD

URBIS

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Appendix A Development Plans – Bates Smart Architects

EXECUTIVE SUMMARY

Urbis Pty Ltd (Urbis) has been engaged by Iglu Pty Ltd (Iglu) to prepare an Historical Archaeological Assessment (HAA) for 80-88 Regent Street, Redfern (the subject site). The subject site is proposed for redevelopment for a new student accommodation facility. It is noted that no basement levels are proposed, and excavation will be limited to piling to support the building.

This HAA will form part of the Environmental Impact Statement (EIS) to be submitted for the proposed development under application SSD 9275, and is being prepared to satisfy the Secretary's Environmental Assessment Requirements (SEARs) Item 9, which requires:

An historical archaeological assessment prepared a suitably qualified historical in accordance with the Heritage Division, Office of Environment and Heritage (OEH) guidelines, including but not limited to 'Assessing Significance for Historical Archaeological Sites and Relics' (2009). The assessment is to demonstrate the following:

- *What historical archaeological relics, if any are likely to be present within the site and the assessment of the significance of the relics (Refer Section 4.2 of this HAA);*
- *The likely impacts of the proposal on these relics (Refer Section 4.5 of this HAA);*
- *Opportunities for avoidance through careful consideration of redesign where state significant archaeological resources are identified and appropriate mitigation strategies where harm to local or State significant archaeological relics is likely to occur (in whole or part as a result of this project) (Refer recommendations at Section 5 of this HAA).*

A review of available historical information, as well as a visual inspection of the buildings currently present on site, suggests that they were constructed soon after c1904 and in association with the subject site being subdivided into five equal and regular allotments. Previous structures on site appear to have been constructed close to c1865. Earlier mapping does not show any evidence of structures c1854/55. Historical evidence suggests that the structures built c1865 were maintained on site until c1904, when the current terrace buildings were constructed. Overall, the subject site has been substantially disturbed by the construction of the buildings currently on site.

The proposal will involve the complete redevelopment of the subject site, and will therefore result in substantial sub-surface disturbance. If present, archaeological remains will be completely destroyed and/or removed by the current proposal.

This HAA concludes that the subject site has a low to moderate degree of potential to contain archaeological material associated with the previous phase of development (c. 1865 – 1903). However, assessment of the potential archaeological remains from this phase considers that, if present, they are highly unlikely to have research potential. Remains from this phase, if present, are also not considered to meet any of the seven criteria for heritage significance.

As such, the potential archaeological impacts of the proposed development are assessed as negligible.

The following recommendations are proposed to manage any chance finds of historical archaeological remains within the subject site:

Recommendation 1

In the unlikely event that unexpected archaeological material was encountered during works, it would be necessary to stop all work in the immediate vicinity of the identified deposits. The NSW Heritage Council would be notified and a qualified archaeologist would be engaged to assess the significance of the material and recommend whether further investigation is required.

Recommendation 2

In the unlikely event that any Aboriginal objects were discovered during site works, work should cease immediately in the affected area and the Office of Environment and Heritage should be notified, in accordance with Section 89A of the National Parks and Wildlife Act 1974 (NSW). Further assessment or approval may be required before works could recommence.

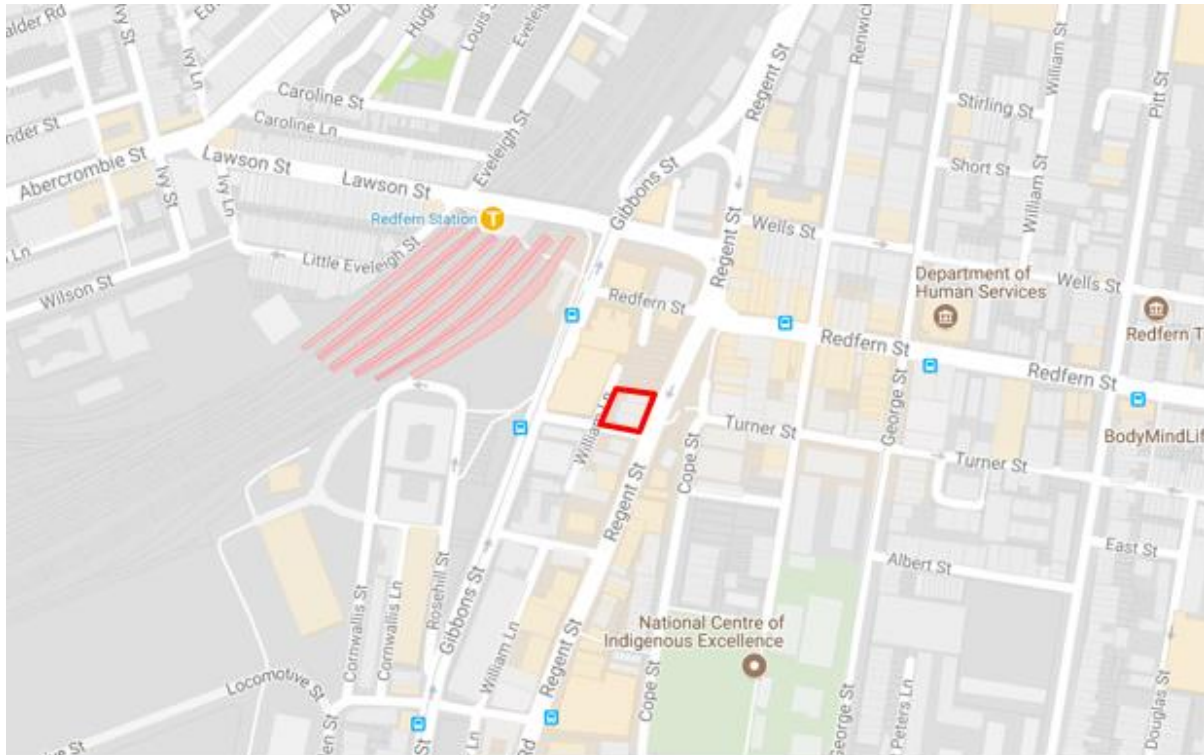
1. INTRODUCTION

Urbis Pty Ltd (Urbis) has been engaged by Iglu Pty Ltd (Iglu) to prepare an Historical Archaeological Assessment (HAA) for 80-88 Regent Street, Redfern (the subject site).

1.1. SITE LOCATION

The subject site is located at 80-88 Regent Street, at the corner of Marian Street, in the suburb of Redfern and approximately 3km from the Sydney CBD. The subject buildings are orientated east towards Regent Street with rear access from William Lane at west. The Study Area is legally described as lots A, B, C, D and E of DP 105824 and is shown in Figure 1.

Figure 1 – Location map, subject site indicated



Source: Google Maps, 2018

1.2. BACKGROUND

The subject site was proposed for redevelopment in 2016, and an HAA was prepared for that proposal (Urbis 2016), to comply with conditions for the project set by the City of Sydney Council and the NSW Heritage Council. Since then, the site has been acquired by Iglu, with the intention of redeveloping the Study Area for student accommodation.

This HAA will form part of the Environmental Impact Statement (EIS) to be submitted for the proposed development under application SSD 9275, and is being prepared to satisfy the Secretary's Environmental Assessment Requirements (SEARs) Item 9, which requires:

An historical archaeological assessment prepared a suitably qualified historical in accordance with the Heritage Division, Office of Environment and Heritage (OEH) guidelines, including but not limited to 'Assessing Significance for Historical Archaeological Sites and Relics' (2009). The assessment is to demonstrate the following:

- *What historical archaeological relics, if any are likely to be present within the site and the assessment of the significance of the relics (Refer Section 4.2 of this HAA);*
- *The likely impacts of the proposal on these relics (Refer Section 4.5 of this HAA);*

- *Opportunities for avoidance through careful consideration of redesign where state significant archaeological resources are identified and appropriate mitigation strategies where harm to local or State significant archaeological relics is likely to occur (in whole or part as a result of this project) (Refer recommendations at Section 5 of this HAA).*

1.3. HERITAGE SIGNIFICANCE

The subject site is not listed under the Sydney Local Environmental Plan 2012, nor is it located within a Heritage Conservation Area.

The subject site is located outside of the boundary of the Central Sydney Archaeological Zoning Plan.

1.4. PROPOSAL

This State Significant Development Application (SSDA) seeks approval for the development of a new student accommodation facility. Specifically, the proposal involves:

- site preparation works;
- construction and use of an 18 storey building comprising:
 - 265 student accommodation beds within 185 units, arranged as follows:
 - 163 x studio units;
 - 6 x loft units; and
 - 16 x 6-bed cluster units.
 - communal student facilities including study areas, rooftop terrace and laundry facilities;
 - three ground floor retail tenancies;
 - a single commercial tenancy;
- landscaping works including terrace planting; and
- extension and augmentation of services and infrastructure as required.

The proposal will operate as an integrated campus with the adjoining Iglu facility adjacent at 66 Regent St Redfern which commenced operation in early 2018.

It is noted that no basement levels are proposed, and excavation will be limited to piling to support the building.

Current development plans, prepared by Bates Smart Architects, are found at Appendix A.

1.5. METHODOLOGY

This HAA updates the previous assessment undertaken by Urbis in 2016. The following tasks have been undertaken to prepare this updated document:

- Review of background reporting, including the existing HAA and the current Heritage Impact Statement (HIS) (Urbis 2018);
- Updated search of the NSW State Heritage Register (and State Heritage Inventory); and
- Preparation of HAA.

A site inspection has not been undertaken specifically for the preparation of this HAA. A site inspection was undertaken to prepare the HIS, and information from that inspection is included in this report.

1.6. AUTHOR IDENTIFICATION

The following report has been prepared by Holly Maclean (Senior Heritage Consultant and Archaeologist). Tina King (Associate Director (Heritage) and Archaeologist) has undertaken technical review.

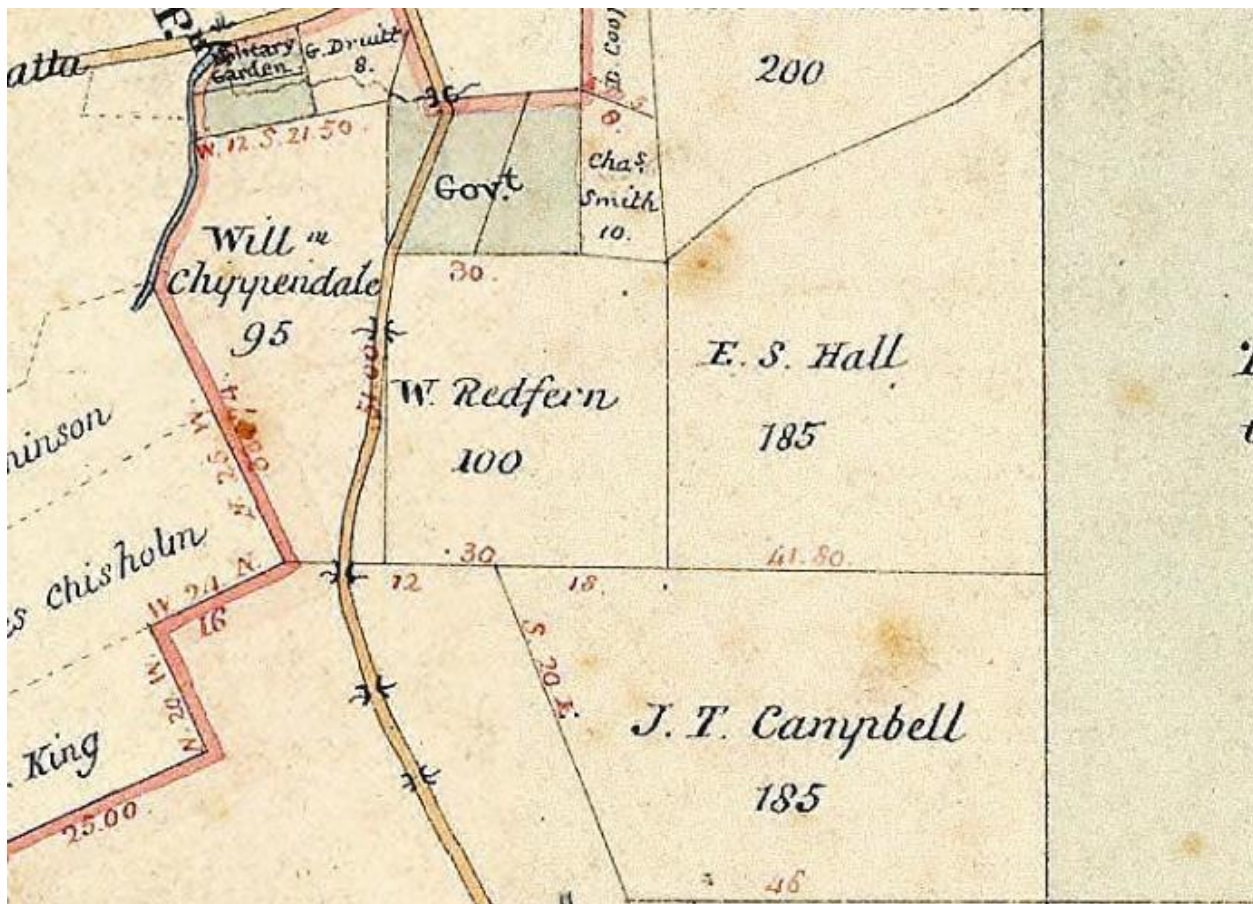
2. HISTORICAL BACKGROUND

This section has been taken from the HIS for the Study Area (Urbis 2018) and a previous archaeological assessment for the Study Area (Urbis 2016), with limited additional research undertaken.

2.1. AREA HISTORY

The subject site originally formed part of 100 acres (40.47 hectares) originally granted to Dr William Redfern, surgeon, on 8 October 1816.¹ This grant was one of three key grants made in the area that marked its first subdivision in the early 1800s. The remaining grants were made to Edward Smith Hall (Edward Smith Hall Estate, 185 acres in Surry Hills, east of Redfern Estate), JT Campbell (Mount Lachlan Grant, 185 acres in size, south of Redfern and Hall Estates).²

Figure 2 – Excerpt from Parish of Alexandria Map, undated



Source: NSW Land Registry Services, Historic Land Records Viewer

The boundary of the Redfern Estate today can be reflected by Cleveland, Elizabeth and Phillip Streets, and Regent/Botany Road. At the time of the grant, the area was known as fertile land, as a result of existing feeder streams and swamps.³

In 1834, large lots were offered for lease from 2-5 acres, and a new road was laid out along the northern boundary, now Cleveland Street. In 1842 Redfern Estate was offered for sale and subdivided on a regular grid pattern into eight blocks. Four of the five streets created were continuations of major city streets to the

¹ Land Titles Office Certificate of Title Volume 1153 Folio 239

² HBO & EMTB Urban and Landscape Design 2006, Waterloo & Redfern: Urban design report, prepared for City of Sydney, http://www.cityofsydney.nsw.gov.au/development/documents/CityPlan/SiteSpecificPlanning/RedfernWaterloo/Final/1_Introduction.pdf.

³ (ibid).

north. One major east-west street was provided, Redfern Street. The Estate also contained an extensive area of gardens of approximately 40 acres in size.⁴

Progress of the subdivision of Redfern Estate, including the new street pattern and progress of development, can be seen in the Woolcott and Clarkes Map of Sydney from 1854.

Redfern was a highly desirable suburb by the start of the 1850s. Pitt Street in particular was a sought after street and the houses reflected this, with attic storeys, timber columns, French Doors and stucco scribed to resemble ashlar stonework, which was also used elsewhere in Sydney at the time.⁵

By the late 1850s the Redfern Estate and surrounding lands were amalgamated to make up the area of Redfern Municipal Council.⁶ Railway expansion from the 1850s to the 1930s also assisted to define the western boundary of Redfern, and determined the pattern of strip retail/commercial development along Redfern and Regent Street/Botany Road.⁷

2.2. SITE HISTORY

Research for the following site history has been based on historical mapping, land titles searches, and Sands Directory entries.

A review of relevant historical mapping suggests that the subject site was not developed until c1865, at the earliest. Earlier mapping strongly suggests that no structures were present c1854-55; no structures are present in the 1854 Woolcott & Clarke map (Figure 4), and although the subject site is located outside of the area covered in the 1855 Smith & Gardiner's map (Figure 5), the western side of Botany Road is shown in this map to generally be undeveloped at that time.

As the below historical maps show, land elsewhere in Redfern had been substantially developed by 1854/55.

The earliest, definite appearance of buildings on the site is evident in the c. 1864 Trigonometrical Survey of Sydney. This historical map clearly shows at least four buildings as being present within the current subject site boundaries, though there is potential that at least part of a fifth building located further to the north may also have fallen within the current subject site (refer Figure 6).

The Metropolitan Detail Series map, dated 1887, shows a very similar configuration of buildings to that shown in the Trigonometrical Survey, though the northern buildings are shown in a slightly different configuration with an additional narrow building shown within the current subject site footprint. This map suggests that a total of five buildings (two wide, and three narrow) were located within the subject site at this time. Based on this mapping, it is also likely that at least part of a sixth narrow building, located further to the north, fell within the current subject site boundaries.

This is consistent with the Land Title record for the subject site dated October 1900, which also shows a total of five buildings (two wide, and three narrow) being located within the subject site, as well as part of a sixth narrow building to the north.

The Atlas of the Suburbs of Sydney, dated c. 1885-1890 (Figure 3) shows that no buildings of note, being particularly civic or more substantial buildings, were present at the subject site at that time.

⁴ HBO & EMTB Urban and Landscape Design 2006, Waterloo & Redfern: Urban design report, prepared for City of Sydney, http://www.cityofsydney.nsw.gov.au/development/documents/CityPlan/SiteSpecificPlanning/RedfernWaterloo/Final/1_Introduction.pdf.

⁵ Heritage Branch Inventory Sheet no. 2421496

⁶ Tonkin Zulaikha Greer Architects 2007, Redfern Public School: Heritage assessment and statement of heritage impact, prepared for the Department of Planning and Infrastructure, http://www.planning.nsw.gov.au/asp/pdf/06_0267_niydc_envtasst_appendixes/06_0267_appendix_7_pages%20from%20heritage%20assessment%206-10.pdf

⁷ HBO & EMTB Urban and Landscape Design 2006, Waterloo & Redfern: Urban design report, prepared for City of Sydney, http://www.cityofsydney.nsw.gov.au/development/documents/CityPlan/SiteSpecificPlanning/RedfernWaterloo/Final/1_Introduction.pdf.

Figure 3 - Atlas of the Suburbs of Sydney, c. 1885-1890, location of subject site indicated in red



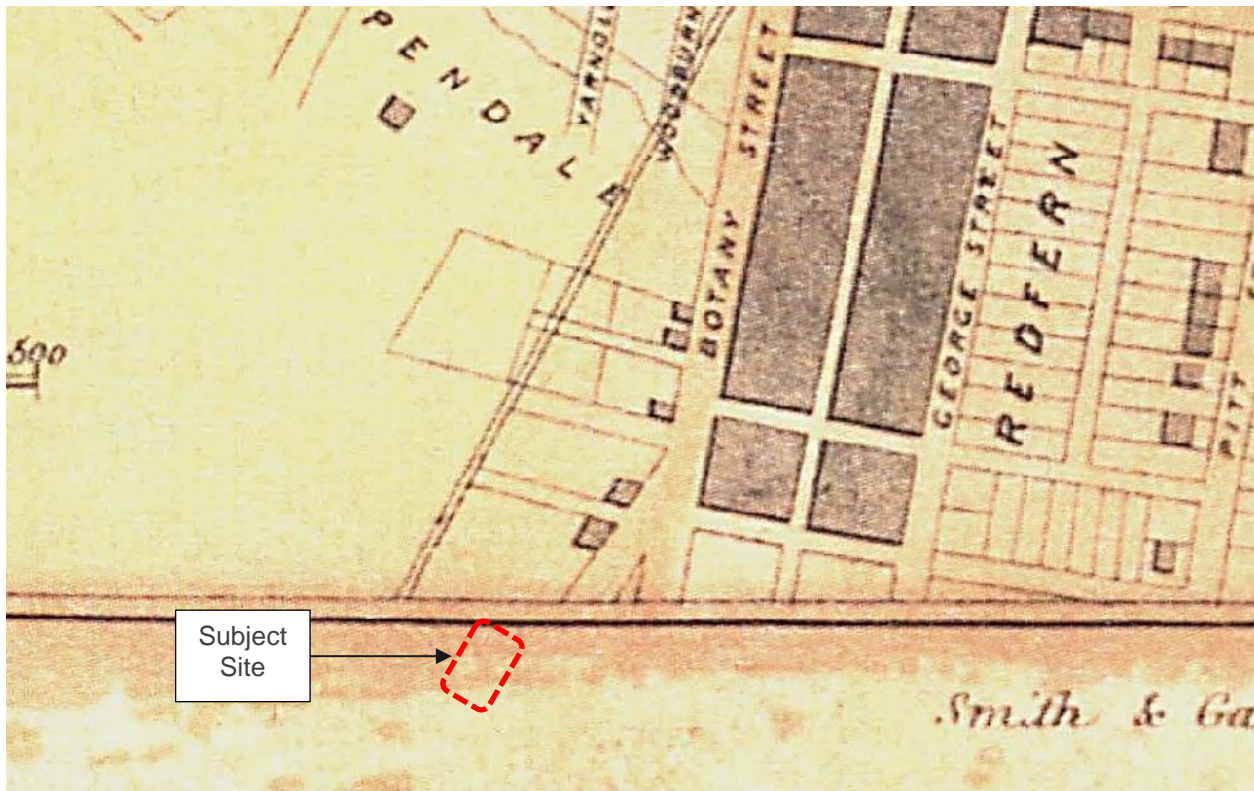
Source: <http://www.photosau.com.au/cosmaps/maps/pdf/AS/Redfern.pdf>

Figure 4 – Excerpt from Woolcott & Clarke's Map of the City of Sydney, 1854. Subject site indicated in red



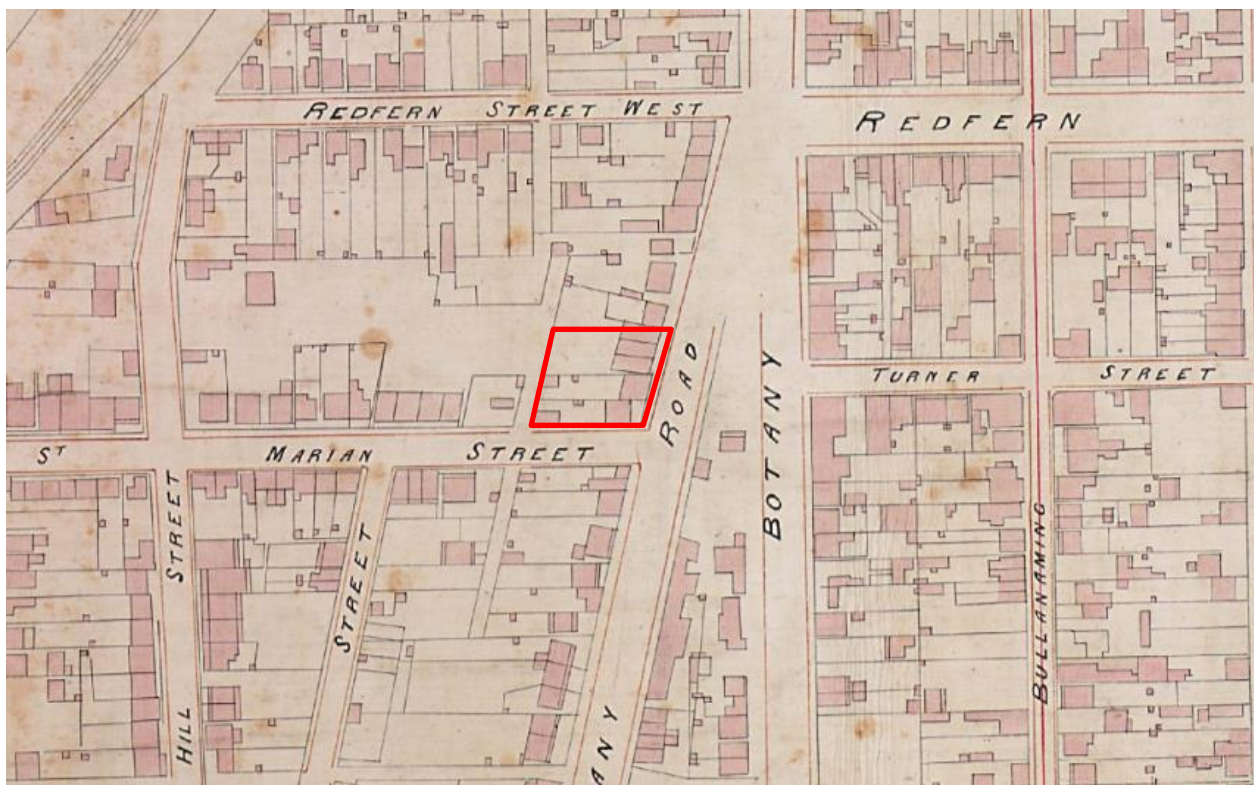
Source: City of Sydney, Historic Atlas

Figure 5 – Smith and Gardiner's Map of Sydney and Suburbs, 1855 (Approx. location of subject site indicated)



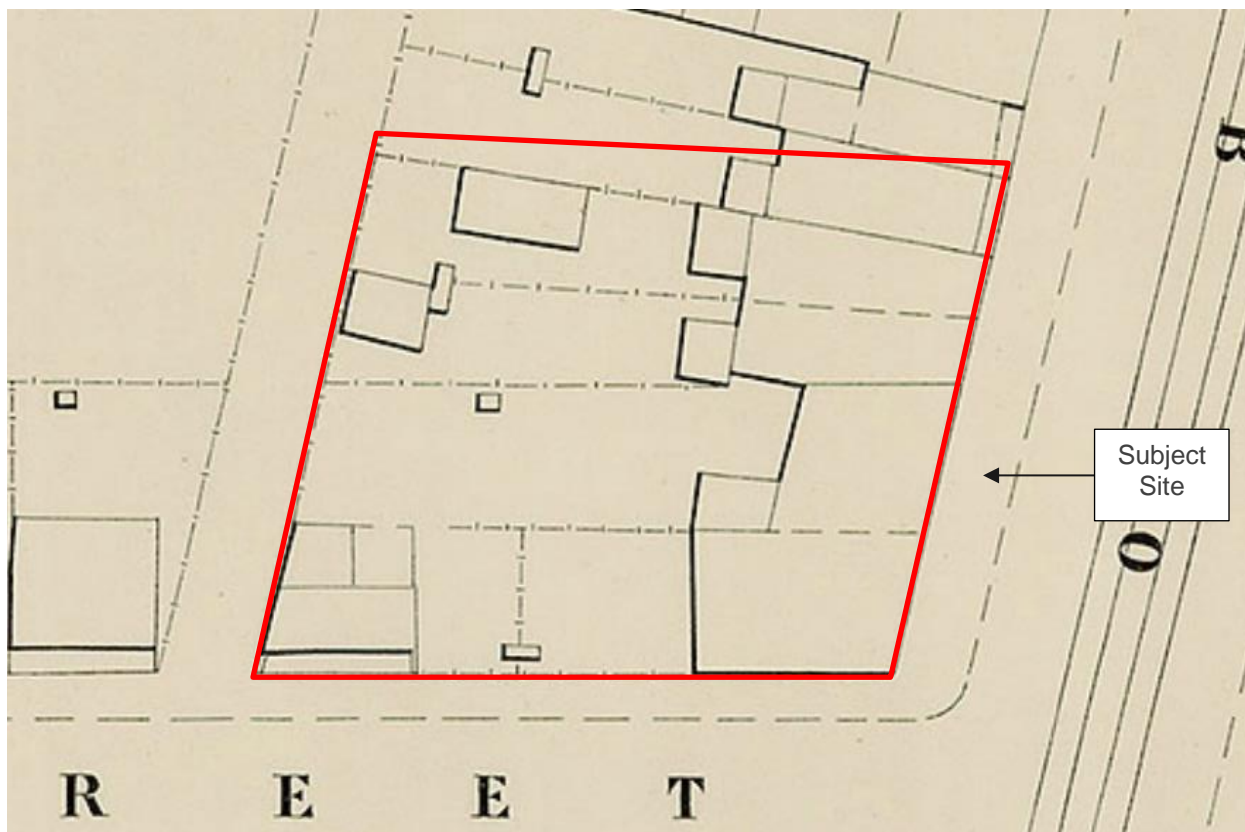
Source:
<http://www.photosau.com.au/cosmaps/maps/pdf/C19/1855%20Smith%20and%20Gardiners%20map%20of%20Sydney.pdf>

Figure 6 – Excerpt from City of Sydney – Trigonometrical Survey, c1864: Block 152, subject site indicated in red



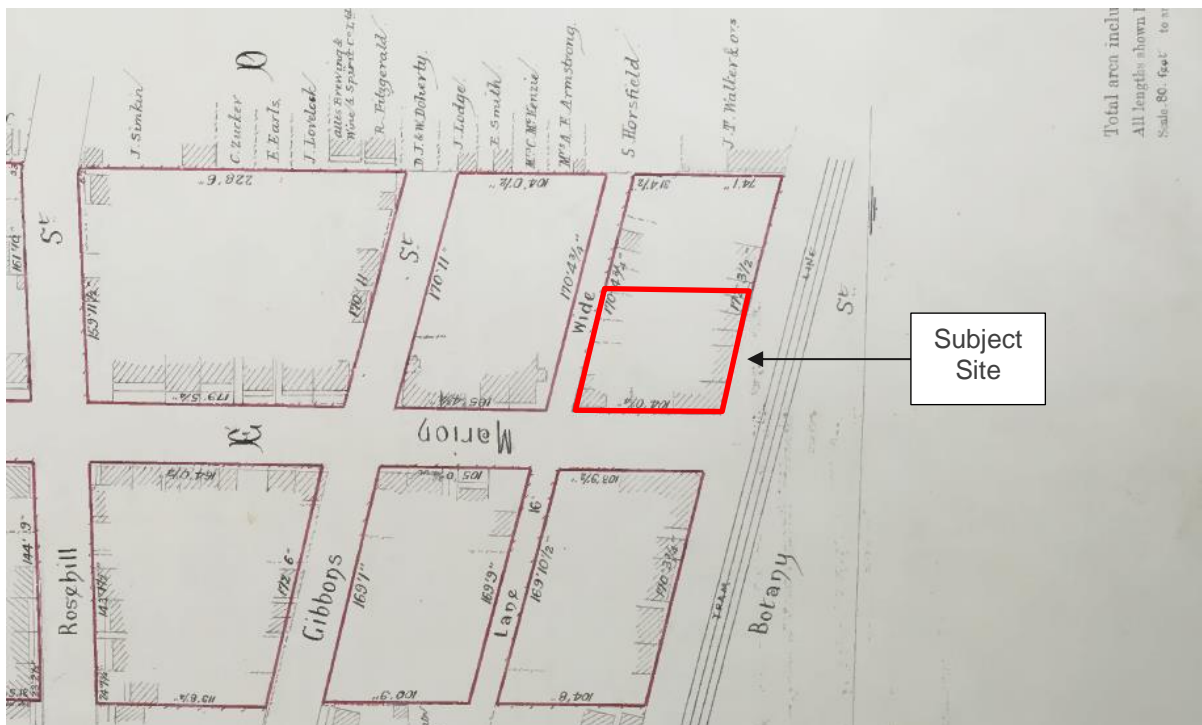
Source: City of Sydney, Historic Atlas

Figure 7 – Sydney Metropolitan Detail Series, Redfern, Sheet 18, 1887 (subject site indicated)



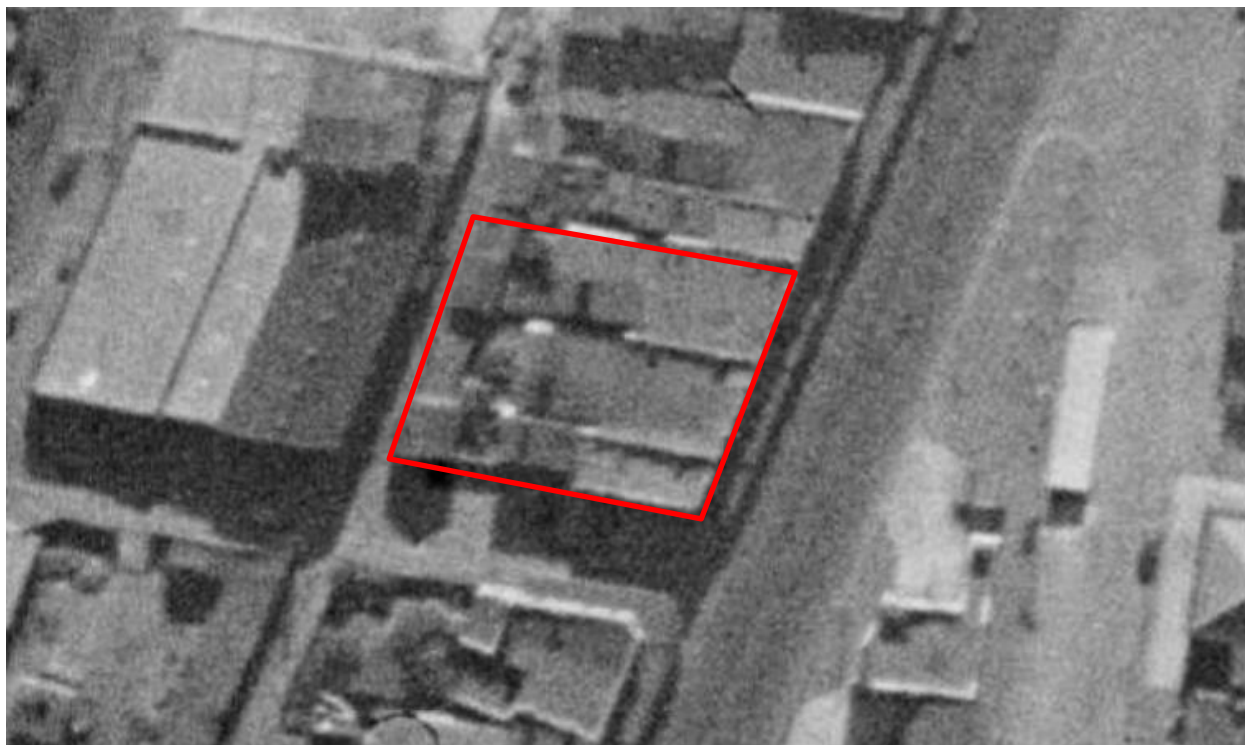
Source: State Library of NSW, item ID 861582

Figure 8 – Certificate of Title (Vol. 1332 Fol. 110), dated 10 October 1900



Source: NSW Land and Property Information

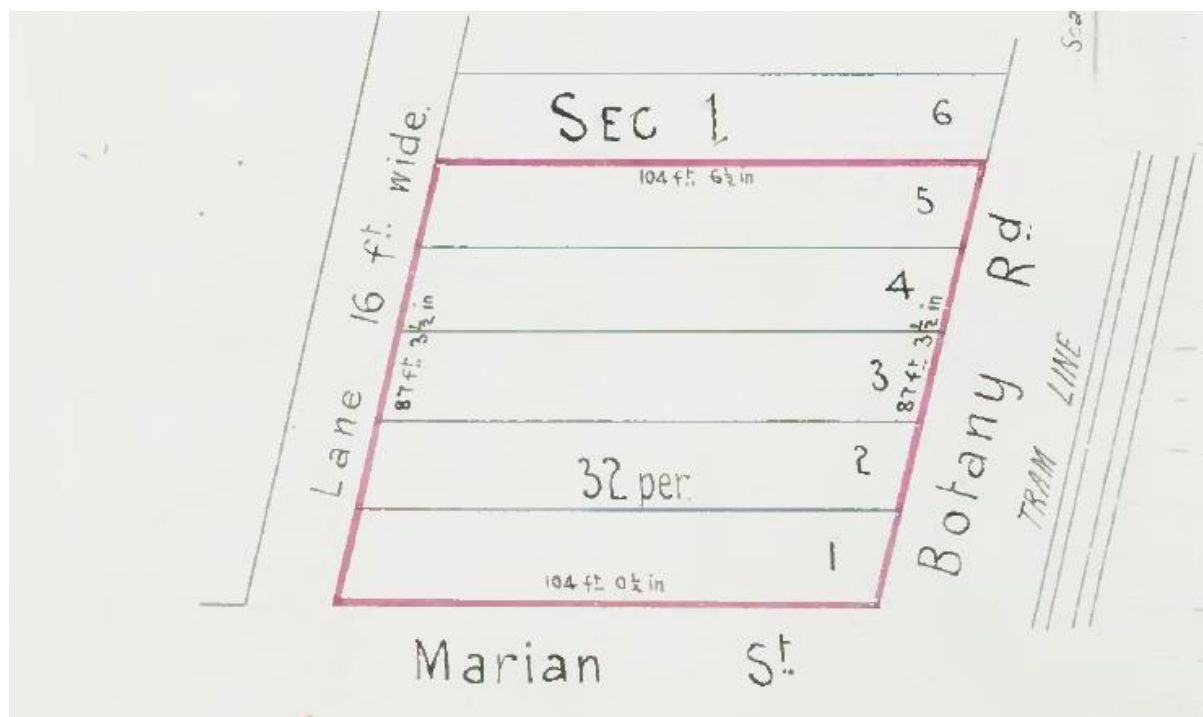
Figure 9 – Historic aerial of subject site, 1943



Source: SIX Maps, 2018

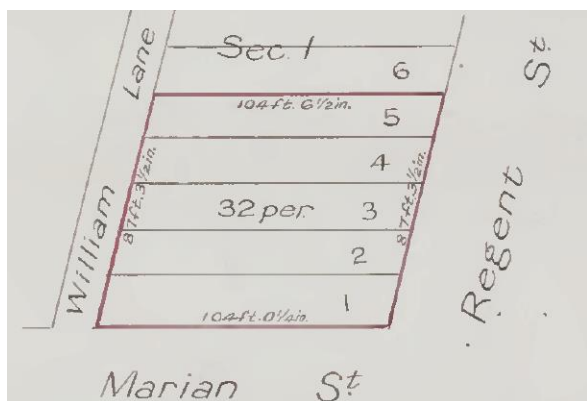
Based on a review of the relevant Land Titles records, it appears that the subject site was divided into five narrow allotments c. 1904 (Figure 10). The configuration of the individual allotments established c. 1904 has been maintained since, as shown in Figure 10 through to Figure 12.

Figure 10 – Certificate of Title (Vol. 1527 Fol. 15), dated 6 April 1904

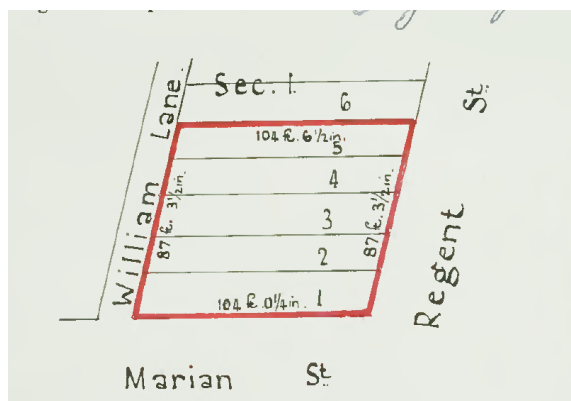


Source: NSW Land and Property Information

Figure 11 – Land Title records for the subject site. Left Certificate of Title (Vol. 4695 Fol. 221), dated 27 June 1935. Right: Certificate of Title (Vol. 6845 Fol. 52), dated 5 August 1954.

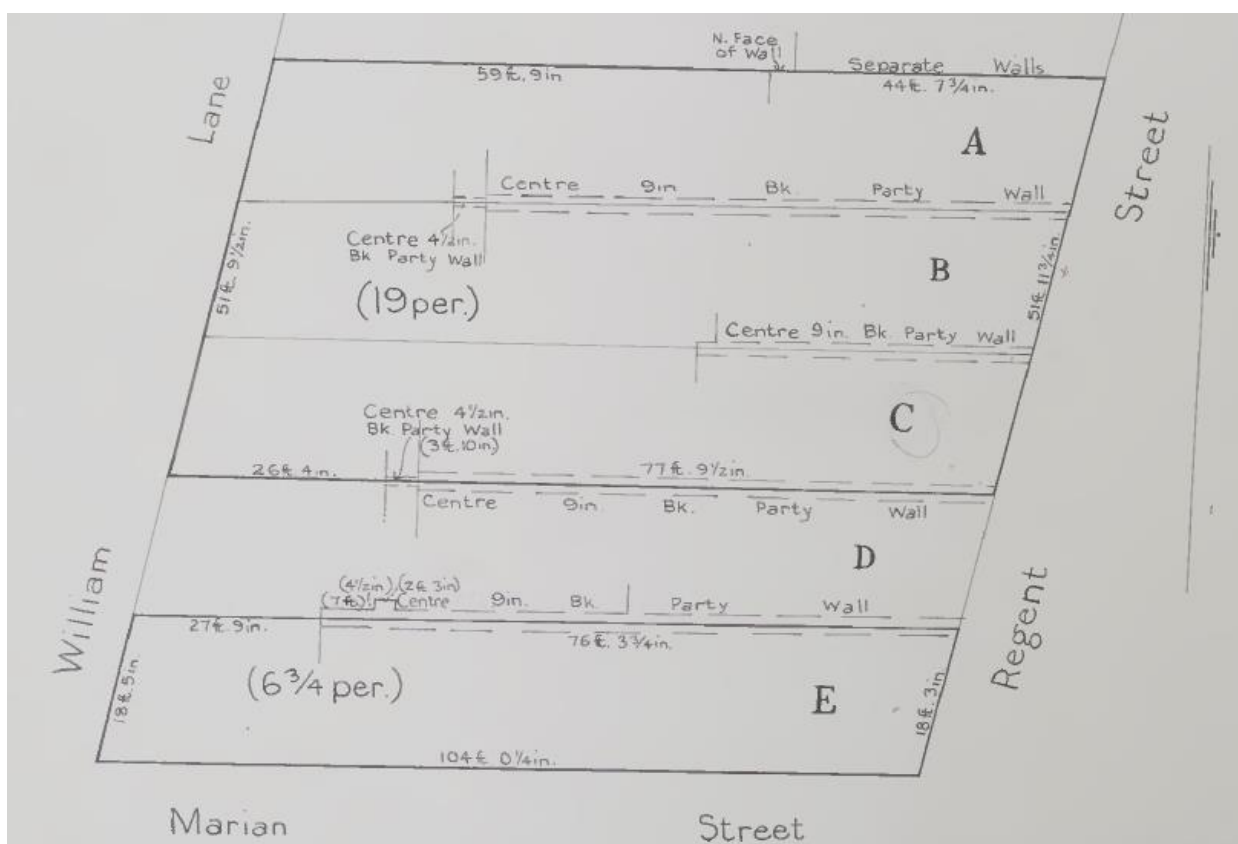


Source: NSW Land and Property Information



Source: NSW Land and Property Information

Figure 12 - Certificate of Title (Vol. 8381 Fol. 162), dated 24 July 1962



Source: NSW Land and Property Information

The earliest available recording for the subject site in the Sands Directory dates to 1879, and identifies the building occupants as follows:

- Charles Southey
- Edward Quick, builder
- William Nichols, dealer
- Henry Press
- Charles Peat, hairdresser
- David Austin, pawnbroker

The buildings continued to house a variety of local businesses, including furniture makers, carpenters, hairdressers and greengrocers; a summary of listed occupants is provided in Appendix A. These were relatively standard services; there is no evidence in the Sands Directory listings to suggest that the buildings had any use that would have been of particular importance to the local community, or that they were owned or occupied by any important figures or personalities.

A review of the Sands Directory listings suggests that the numbering of 112-120 applied to the subject properties until 1891, at which time they changed to 132-140. They changed again in 1915 to the present numbering of 80-88.

Though it is not clear from the historical record exactly when the current terraces present at the subject site were constructed, the Land Titles records strongly suggests that they were constructed soon after c. 1904 and following the regular subdivision of the subject site into five equal allotments. This is consistent with the architectural style of the terraces, which are vaguely Federation in their parapet design.

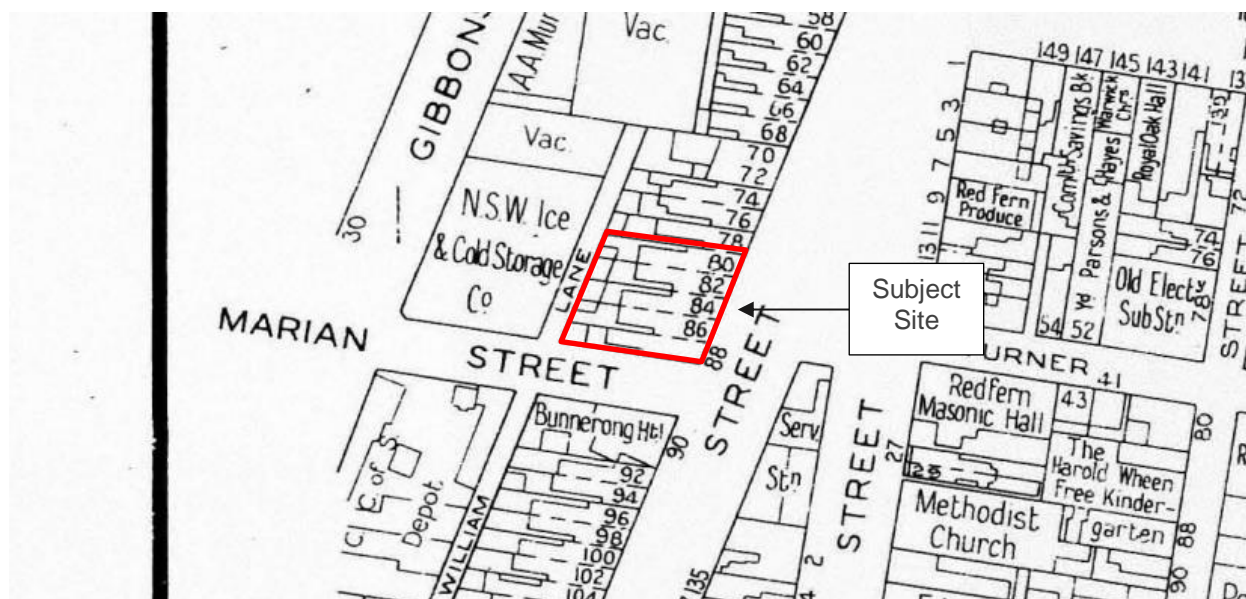
Historical mapping also suggests that small-scale outbuildings were present at the rear of the subject properties post-c.1904 (refer Figure 14). These structures are unlikely to have been particularly substantial or robust, and are highly unlikely to have had any historically significant uses.

Figure 13 – Civic Survey, Redfern, c. 1951. subject site indicated in red.



Source: <http://www.photosau.com.au/cosmaps/maps/pdf/CS/Redfern.pdf>

Figure 14 – City Building Surveyor's Department, Building Regulation Branch, Sheet 15, 1968-1972 (subject site indicated)



Source: <http://www.photosau.com.au/cosmaps/maps/pdf/CBS/Sheet15.pdf>

2.3. IDENTIFIED HISTORICAL PHASES

A review of available historical information, as well as a visual inspection of the buildings currently present on site, suggests that they were constructed soon after c1904 and in association with the subject site being subdivided into five equal and regular allotments.

Previous structures on site appear to have been constructed close to c1865. Earlier mapping does not show any evidence of structures c1854/55. Historical evidence suggests that the structures built c1865 were maintained on site until c1904, when the current terrace buildings were constructed.

The phases of occupation of the subject site are therefore assessed as:

Pre-c1865

Vacant.

c1865-1903

Total of five buildings (two wide, and three narrow) located within the subject site at this time. It is also likely that at least part of a sixth narrow building, located further to the north, fell within the current subject site boundaries.

Sands Directory listings for these buildings show that they functioned as commercial premises for a variety of uses and under the tenancy of multiple occupants. This includes a hairdresser, greengrocers, china and glass dealers, tobacconists, storekeepers, fruiterers, etc.

c1904 to present

Current terrace buildings present on site.

Sands Directory listings and Land Titles records show that the subject buildings have functioned as commercial premises for a variety of uses and under the tenancy of multiple occupants, similar to above.

3. SITE DESCRIPTION

3.1. SURROUNDING CONTEXT

The character and typology of the existing building stock in the area is varied. To the east of the subject site is the Redfern Estate Heritage Conservation Area. This area comprises early single storey cottages, Victorian terraces, later terraces and recent medium density developments. There are some early 20th century factories and warehouses which are variously being converted for residential use. Some sites have also been amalgamated for higher density use.

The block bounded by Regent, Gibbons, Lawson and Marion Streets is dominated by contemporary high density residential/commercial developments including that directly to the west of the subject site. The subject site and the area directly adjacent to the north are an anomaly on the block as the only two storey developments remaining.

The aforementioned block responds to the higher density zoning around Redfern Train Station which is located to the west on the opposite side of Gibbons Street.

3.2. SUBJECT SITE

The subject site comprises five early 20th Century commercial terraces on the western side of Regent Street. The southernmost shop (No. 88) is located on the corner of Regent Street and Marian Street. The site is opposite The Jack Floyd Reserve which is adjacent to the western boundary of the conservation area opposite the subject site.

The eastern facades of the shops are largely original above the line of the ground floor awning and are representative of Victorian commercial terraces. However, the double arched windows in the primary façade of the northern shop have been removed and replaced with a simple rectangular window. All five shops are surmounted by a parapet with decorative relief including a central triangular element. The first floor of the two northernmost properties is painted green and the remaining three are painted in various colours.

Below the awning, there is little original fabric. Specifically, the southernmost shopfront appears to be the only one which features an original inset splayed entry with tiles, although the glazing and mullions may be later. All other shop fronts have been highly modified.

The rear courtyards of the properties are concrete, and feature boundary walls to the north, south and west onto the rear lane.

Overall, the subject site has been substantially disturbed by the construction of the buildings currently on site.

Photographs of the Study Area are at Pictures 1 to 6.



Picture 1 – Front facades of subject site from Regent Street facing west

Source: Urbis 2018



Picture 2 – Rear of subject site from corner of Marian Street and William Lane, facing north-east

Source: Urbis 2018



Picture 3 – Rear of subject site from William Lane facing east

Source: *Urbis 2018*



Picture 4 – Rear of subject site from William Lane, facing south

Source: *Urbis 2018*



Picture 5 – Shop fronts on Regent Street

Source: *Urbis 2018*



Picture 6 – Rear of 86 Regent Street

Source: *Urbis 2018*

4. HISTORICAL ARCHAEOLOGICAL ASSESSMENT

Historical archaeology is the study of the past using physical evidence in conjunction with historical sources. It focuses on the objects used by people in the past and the places where they lived and worked. It can tell us about the way things were made and used and how people lived their daily lives. Archaeology is not just about objects and remains; it is also about landscapes and links between sites. Archaeology is assessed in two ways, the potential for the site to retain an archaeological resource and the significance of that resource.

As such, this Assessment does not assess the built heritage significance of the current terraces, but assesses only the potential archaeological significance of the subject site (previous phases of occupation) and the potential archaeological impacts of the proposed development.

4.1. PREVIOUS ARCHAEOLOGICAL INVESTIGATIONS

There have been no previous archaeological investigations of the subject site specifically.

An archaeological assessment of the neighbouring site at No. 60-78 Regent Street was undertaken by Artefact Heritage in 2016.⁸ That assessment made the following conclusion:

“The whole of the study area has been assessed as having moderate to high historical archaeological potential. Four major phases of development and re-development have been identified, from the mid-nineteenth through to the early twentieth centuries. Each phase of development will have involved impact on earlier archaeological remains. However, this impact is likely to have affected only discrete parts of the study area. It is therefore likely that archaeological remains from c.1854 onwards survive.”

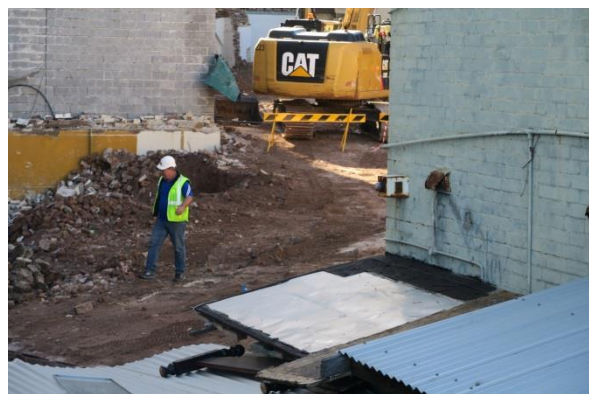
The assessment concluded that “the potential remains relating to the period prior to c1871 (when the extant buildings were constructed) are of local heritage significance, due to their research potential.” On this basis, the report provided a research design and methodology and recommended that an historical archaeological investigation program should be incorporated into the construction schedule.

Test excavations were consequently undertaken at the neighbouring site, and included the excavation of three test pits, measuring approximately 2 x 4 metres in size. The test excavations **did not uncover any archaeological remains associated with earlier phases of development** due to the extent to which the site had been disturbed by the latest phase of development.



Picture 7 – View of No. 60-78, showing construction works in progress

Source: Artefact Heritage 2016



Picture 8 – View of No. 60-78, showing construction works in progress and level of disturbance

Source: Artefact Heritage 2016

⁸ February 2016, Artefact Heritage, 60-78 Regent Street, Redfern: Historical Archaeological Impact Assessment, prepared for Iglu Pty Ltd.



Picture 9 – View of No. 60-78, showing partial demolition of buildings in progress

Source: Artefact Heritage 2016

4.2. ARCHAEOLOGICAL POTENTIAL

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.*⁹

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 archaeological potential of the study area will be presented using the following grades:

Low Potential: 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: land use history suggests limited phases of low-moderate development intensity, or that there are impacts in this area. A range of archaeological remains are likely to survive, including building footings and shallower remains as well as deeper sub-surface features.

High Potential: substantially intact archaeological remains could survive in these areas.

The following table details the potential for archaeological features or deposits to survive in the study area.

Table 1 – Archaeological Potential

Phase	Activity	Potential Archaeological Remains	Likely Survival
Pre c1865	Vacant land	Tree roots, charcoal deposits, artefact scatters, soil deposits, palaeobotanical evidence, fence posts, connecting paths/tracks, cutting of bedrock, drainage, dirt or gravel surfaces.	<p>Nil - low due to ephemeral nature of remains and extensive construction works and reworking of the built and natural landscape in following phases.</p> <p>Such remains are unlikely to provide information that would significantly contribute to the understanding of the local area's history, or provide information that is unavailable elsewhere.</p> <p>It is noted that test excavations have been undertaken at the</p>

⁹ Department of Urban Affairs and Planning 1996

Phase	Activity	Potential Archaeological Remains	Likely Survival
			neighbouring site; this involved the excavation of three test pits, measuring approximately two x four metres in size. These test excavations did not uncover any archaeological remains associated with earlier phases of development due to the extent to which the site had been disturbed by the latest phase of development.
c1865-1903	Development and maintenance of commercial premises	Building remains (foundations, surfaces), paths, underground services and artefacts associated with the former buildings, drainage, deep features such as rubbish pits cesspits and wells.	Low to moderate due demolition of the buildings and later construction works/reworking of the natural landscape in following phases. Such remains are unlikely to provide information that would significantly contribute to the understanding of the local area's history, or provide information that is unavailable elsewhere.
c1904 to present	Regular subdivision of subject site into five equal lots, demolition of previous buildings on site, construction of terrace buildings currently present	Not applicable. Terrace buildings are extant.	Not applicable.

4.3. ARCHAEOLOGICAL 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. That is, scientific significance is defined as research potential.*¹⁰

Assessing the research potential of an archaeological site stresses the importance of the need for archaeological research to add to the knowledge of the past in an important way, rather than merely duplicating known information or information that might be more readily available from other sources such as documentary records or oral history.¹¹

The Heritage Division of (OEH) issued a guideline in 2009, entitled *Assessing Significance for Historical Archaeological Sites and 'Relics'*. This guidelines calls for broader consideration of multiple values of archaeological sites beyond their research potential. There are two levels of heritage significance used in NSW: state and local.

¹⁰ Bickford and Sullivan, 1984 p: 23–24, as quoted in the Heritage Branch, 2009, *Assessing Significance for Historical Archaeological Sites and Relics*.p:8

¹¹ As above.

The following significance assessment provides a broad consideration of the potential heritage significance of archaeological remains that may be present on site.

Table 2 – Significance Assessment

Criteria	Significance Assessment
A – Historical Significance <i>An item is important in the course or pattern of the local area's cultural or natural history.</i>	<p>Any potential archaeological resource remaining within the subject site is unlikely to be associated with significant historical events or be able to demonstrate strong associations to past customs, cultural practices, philosophies or systems of government.</p> <p>It is acknowledged that there is a low to moderate degree of potential for the site to contain archaeological remains of the previous phase of occupation (c1865-1903). However, based on historical research, development from this phase was not associated with any particularly significant people, businesses or activities; rather, the previous buildings have been shown to generally be associated with common commercial businesses of the time, such as hairdressers, greengrocers, pawnbrokers etc.</p> <p>If archaeological remains associated with this previous phase of occupation are present on site, it is likely to be limited to structural remnants, such as footings. Such remains are unlikely to provide information that would contribute to a greater understanding of the local area's history. Again, there is no evidence to suggest that the buildings previously present on site would be of particular historical significance; they were not important civic buildings and were not associated with any significant figures, activities or businesses.</p> <p>Based on the above, potential archaeological remains at the subject site are not considered to meet the criterion of historical significance.</p>
Guidelines for Inclusion <ul style="list-style-type: none"> shows evidence of a significant human activity <input type="checkbox"/> is associated with a significant activity or historical phase <input type="checkbox"/> maintains or shows the continuity of a historical process or activity <input type="checkbox"/> 	Guidelines for Exclusion <ul style="list-style-type: none"> has incidental or unsubstantiated connections with historically important activities or processes <input type="checkbox"/> provides evidence of activities or processes that are of dubious historical importance <input type="checkbox"/> has been so altered that it can no longer provide evidence of a particular association <input checked="" type="checkbox"/>
B – Associative Significance <i>An item has strong or special associations with the life or works of a person, or group of persons, of importance in the local area's cultural or natural history.</i>	<p>Current research has not been able to identify any strong associations between buildings previously present on the site and a particular event, historical theme, people or philosophies.</p> <p>Based on the above, potential archaeological remains at the subject site are not considered to meet the criterion of associative significance.</p>
Guidelines for Inclusion <ul style="list-style-type: none"> shows evidence of a significant human occupation <input type="checkbox"/> is associated with a significant event, person, or group of persons <input type="checkbox"/> 	Guidelines for Exclusion <ul style="list-style-type: none"> has incidental or unsubstantiated connections with historically important people or events <input type="checkbox"/> provides evidence of people or events that are of dubious historical importance <input type="checkbox"/> has been so altered that it can no longer provide evidence of a particular association <input checked="" type="checkbox"/>
C – Aesthetic Significance <i>An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the local area.</i>	<p>If archaeological remains associated with this previous phase of occupation are present on site, it is likely to be limited to structural remnants, such as footings, with a limited potential for intact wells or cesspits to be present.</p>

Criteria	Significance Assessment
	<p>There is no historical evidence to suggest that the buildings previously present on site would have been particularly aesthetically distinctive or representative of a high degree of creative or technical achievement.</p> <p>They were not particularly notable civic buildings, have not been identified as aesthetically distinctive or well known in the historic record, and are not associated with any historical figures, events, or organisations that would suggest that they are likely to have been architecturally significant for their time or context.</p> <p>Rather, the previous buildings have been shown to generally be associated with common commercial businesses of the time, such as hairdressers, greengrocers, pawnbrokers etc; they are therefore highly likely to have been typical commercial buildings in the Victorian style.</p> <p>Extant examples of Victorian commercial buildings are readily available elsewhere within the local area and wider local government area of Sydney.</p> <p>As such, any potential archaeological resource remaining within the subject site is unlikely to demonstrate creative or technical excellence, innovation or achievement or distinctive aesthetic attributes.</p> <p>Based on the above, potential archaeological remains at the subject site are not considered to meet the criterion of aesthetic significance.</p>
Guidelines for Inclusion <ul style="list-style-type: none"> ▪ shows or is associated with, creative or technical innovation or achievement <input type="checkbox"/> ▪ is the inspiration for a creative or technical innovation or achievement <input type="checkbox"/> ▪ is aesthetically distinctive <input type="checkbox"/> ▪ has landmark qualities <input type="checkbox"/> ▪ exemplifies a particular taste, style or technology <input type="checkbox"/> ▪ <input type="checkbox"/> 	Guidelines for Exclusion <ul style="list-style-type: none"> ▪ is not a major work by an important designer or artist <input checked="" type="checkbox"/> ▪ has lost its design or technical integrity <input type="checkbox"/> ▪ its positive visual or sensory appeal or landmark and scenic qualities have been more than temporarily degraded <input type="checkbox"/> ▪ has only a loose association with a creative or technical achievement <input type="checkbox"/>
D – Social Significance <i>An item has strong or special association with a particular community or cultural group in the local area for social, cultural or spiritual reasons.</i>	<p>There is no evidence to suggest that buildings previously present on site had any strong or special association with a particular community or cultural group in the local area for social, cultural or spiritual reasons.</p> <p>As already discussed, the previous buildings have been shown to generally be associated with common commercial businesses of the time, such as hairdressers, greengrocers, pawnbrokers etc.</p> <p>Based on the above, potential archaeological remains at the subject site are not considered to meet the criterion of social significance.</p>
Guidelines for Inclusion <ul style="list-style-type: none"> ▪ is important for its associations with an identifiable group <input type="checkbox"/> ▪ is important to a community's sense of place <input type="checkbox"/> 	Guidelines for Exclusion <ul style="list-style-type: none"> ▪ is only important to the community for amenity reasons <input type="checkbox"/> ▪ is not associated with an identifiable group <input checked="" type="checkbox"/>
E – Research Potential	<p>It is acknowledged that there is a low to moderate degree of potential for the site to contain archaeological remains of the</p>

Criteria	Significance Assessment
<p><i>An item has potential to yield information that will contribute to an understanding of the local area's cultural or natural history.</i></p>	<p>previous phase of occupation (c. 1865-1903). However, based on historical research, development from this phase was not associated with any particularly significant people, businesses or activities; rather, the previous buildings have been shown to generally be associated with common commercial businesses of the time, such as hairdressers, greengrocers, pawnbrokers etc.</p> <p>If archaeological remains associated with this previous phase of occupation are present on site, it is likely to be limited to structural remnants, such as footings. Such remains are unlikely to provide information that would contribute to a greater understanding of the local area's history.</p> <p>Any wells or cesspits are likely to have been filled during the construction of the current subject buildings; if present, they would be unlikely to reveal any archaeological material or resources that would be of particular significance, or which would contribute to a greater understanding of the site and local area than is already available.</p> <p>Again, there is no evidence to suggest that the buildings previously present on site would be of particular historical significance; they were not important civic buildings and were not associated with any significant figures, activities or businesses.</p> <p>Rather, the previous buildings have been shown to generally be associated with common commercial businesses of the time, such as hairdressers, greengrocers, pawnbrokers etc; they are therefore highly likely to have been typical commercial buildings in the Victorian style.</p> <p>Extant examples of Victorian commercial buildings are readily available elsewhere within the local area and wider local government area of Sydney. Further, it is considered unlikely that structural remnants would provide information about the period that is not already available within the historical record in the form of mapping, paintings, photographs, written records and archaeological resources uncovered elsewhere.</p> <p>It is considered unlikely that excavations of the subject site would uncover remains that would contribute to a greater understanding of the local area's history; building footings or residual occupational deposits are unlikely to provide new or significant historical information that is not available elsewhere.</p> <p>Further, the later phase of development (c. 1904) is likely to have resulted in the disturbance, and possibly severe disturbance, of any archaeological remains previously deposited on site. This is supported by the results of test excavations undertaken at 60-78 Regent Street to the north, which <i>did not uncover any archaeological remains associated with earlier phases of development due to the extent to which the site had been disturbed by the latest phase of development</i> (Artefact Heritage 2016).</p> <p>Based on the above, potential archaeological remains at the subject site are considered unlikely to have research potential.</p>
Guidelines for Inclusion	Guidelines for Exclusion

Criteria	Significance Assessment
<ul style="list-style-type: none"> has the potential to yield new or further substantial scientific and/or archaeological information <input type="checkbox"/> is an important benchmark or reference site or type <input type="checkbox"/> provides evidence of past human cultures that is unavailable elsewhere <input type="checkbox"/> 	<ul style="list-style-type: none"> the knowledge gained would be irrelevant to research on science, human history or culture <input checked="" type="checkbox"/> has little archaeological or research potential <input checked="" type="checkbox"/> only contains information that is readily available from other resources or archaeological sites <input checked="" type="checkbox"/>
<p>F – Rarity <i>An item possesses uncommon, rare or endangered aspects of the local area's cultural or natural history.</i></p>	<p>Any potential archaeological resource remaining within the subject site is unlikely to demonstrate unusually accurate evidence of a significant human activity or be the only example of its type.</p> <p>Extremely early evidence of land use is likely to be rare; however as the site has been extensively disturbed archaeological deposits that pre-date the first phase of development are highly unlikely to have survived.</p> <p>As already mentioned, extant examples of Victorian commercial buildings are available elsewhere within the local area and wider local government area of Sydney.</p> <p>Based on the above, potential archaeological remains at the subject site are considered unlikely to meet the criterion for rarity.</p>
<p>Guidelines for Inclusion</p> <ul style="list-style-type: none"> provides evidence of a defunct custom, way of life or process <input type="checkbox"/> demonstrates a process, custom or other human activity that is in danger of being lost <input type="checkbox"/> shows unusually accurate evidence of a significant human activity <input type="checkbox"/> is the only example of its type demonstrates designs or techniques of exceptional interest <input type="checkbox"/> shows rare evidence of a significant human activity important to a community <input type="checkbox"/> 	<p>Guidelines for Exclusion</p> <ul style="list-style-type: none"> is not rare <input checked="" type="checkbox"/> is numerous but under threat <input type="checkbox"/>
<p>G – Representative <i>An item is important in demonstrating the principal characteristics of a class of NSWs (or the local area's):</i></p> <ul style="list-style-type: none"> cultural or natural places; or cultural or natural environments 	<p>It is possible that the buildings previously present on site would be representative of Victorian commercial buildings of their time.</p> <p>However, it is extremely unlikely that this would be able to be determined through uncovered archaeological resources, even if highly intact; if present, such resources would most likely be in the form of footings, which are unlikely to be substantially intact.</p> <p>Again, it is highly unlikely that any archaeological remains at the site would provide information that is not available elsewhere, either within the historic record or within extant building stock from the same period.</p> <p>Based on the above, potential archaeological remains at the subject site are considered unlikely to meet the criterion for representativeness.</p>
<p>Guidelines for Inclusion</p> <ul style="list-style-type: none"> is a fine example of its type <input type="checkbox"/> has the principal characteristics of an important class or group of items <input type="checkbox"/> has attributes typical of a particular way of life, philosophy, custom, significant process, design, technique or activity <input type="checkbox"/> is a significant variation to a class of items <input type="checkbox"/> 	<p>Guidelines for Exclusion</p> <ul style="list-style-type: none"> is a poor example of its type <input type="checkbox"/> does not include or has lost the range of characteristics of a type <input checked="" type="checkbox"/> does not represent well the characteristics that make up a significant variation of a type <input checked="" type="checkbox"/>

Criteria	Significance Assessment
<ul style="list-style-type: none"> is part of a group which collectively illustrates a representative type <input type="checkbox"/> is outstanding because of its setting, condition or size <input type="checkbox"/> is outstanding because of its integrity or the esteem in which it is held <input type="checkbox"/> 	

4.4. STATEMENT OF SIGNIFICANCE

It is acknowledged that there is a low to moderate degree of potential for the site to contain archaeological remains of the previous phase of occupation (c1865-1903). However, based on historical research, development from this phase was not associated with any particularly significant people, businesses or activities; rather, the previous buildings have been shown to generally be associated with common commercial businesses of the time, such as hairdressers, greengrocers, pawnbrokers etc.

If archaeological remains associated with this previous phase of occupation are present on site, it is likely to be limited to structural remnants, such as footings. Such remains are unlikely to provide information that would contribute to a greater understanding of the local area's history.

Any wells or cesspits are likely to have been filled during the construction of the current subject buildings; if present, they would be unlikely to reveal any archaeological material or resources that would be of particular significance, or which would contribute to a greater understanding of the site and local area than is already available.

Extant examples of Victorian commercial buildings are readily available elsewhere within the local area and wider local government area of Sydney. Further, it is considered unlikely that structural remnants would provide information about the period that is not already available within the historical record in the form of mapping, paintings, photographs, written records and archaeological resources uncovered elsewhere.

It is considered unlikely that excavations of the subject site would uncover remains that would contribute to a greater understanding of the local area's history; building footings or residual occupational deposits are unlikely to provide new or significant historical information that is not available elsewhere.

Further, the later phase of development (c1904) is likely to have resulted in the disturbance, and possibly severe disturbance, of any archaeological remains previously deposited on site. This is supported by the results of test excavations undertaken at 60-78 Regent Street to the north, **which did not uncover any archaeological remains associated with earlier phases of development** due to the extent to which the site had been disturbed by the latest phase of development.

Based on the above, potential archaeological remains at the subject site are not considered to have research potential and are not considered to meet any of the seven criteria for heritage significance.

4.5. ASSESSMENT OF IMPACT

The proposal will involve the complete redevelopment of the subject site, and will therefore result in substantial sub-surface disturbance. If residual archaeological remains are present they will be completely destroyed and/or removed by the current proposal.

It has been acknowledged that the subject site has a low to moderate degree of potential to contain archaeological material associated with the previous phase of development (c1865 – 1903). However, potential archaeological remains from this phase have been assessed above, and it has been determined that, if present, they are highly unlikely to have research potential. Remains from this phase, if present, are also not considered to meet any of the seven criteria for heritage significance.

As such, the potential archaeological impacts of the proposed development are assessed as negligible.

5. CONCLUSION AND RECOMMENDATIONS

This archaeological assessment has considered:

- The archaeological potential of the subject site;
- The likely significance of any archaeological remains that may be present;
- The potential archaeological impacts of the proposal based on the above.

Based on the assessment provided in Section 4, it has been determined that:

- There is a low to moderate degree of potential for the site to contain archaeological remains of the previous phase of occupation (c1865-1903);
- Based on historical research, development from this phase was not associated with any particularly significant people, businesses or activities; rather, the previous buildings have been shown to generally be associated with common commercial businesses of the time, such as hairdressers, greengrocers, pawnbrokers etc.
- Extant examples of Victorian commercial buildings are readily available elsewhere within the local area and wider local government area of Sydney. Further, it is considered unlikely that structural remnants would provide information about the period that is not already available within the historical record in the form of mapping, paintings, photographs, written records and archaeological resources uncovered elsewhere.
- If archaeological remains associated with this previous phase of occupation are present on site, it is likely to be limited to structural remnants, such as footings. Such remains are unlikely to provide information that would contribute to a greater understanding of the local area's history.
- Any wells or cesspits are likely to have been filled during the construction of the current subject buildings; if present, they would be unlikely to reveal any archaeological material or resources that would be of particular significance, or which would contribute to a greater understanding of the site and local area than is already available.
- The later phase of development (c1904) is likely to have resulted in the disturbance, and possibly severe disturbance, of any archaeological remains previously deposited on site. This is supported by the results of test excavations undertaken at 60-78 Regent Street to the north, which *did not uncover any archaeological remains associated with earlier phases of development due to the extent to which the site had been disturbed by the latest phase of development*. This further limits the archaeological potential of the site.

Based on the above, potential archaeological remains at the subject site are not considered to have research potential and are not considered to meet any of the seven criteria for heritage significance. As such, the potential archaeological impacts of the proposed development are assessed as negligible. There is no identified requirement for further archaeological investigation of the subject site.

5.1. RECOMMENDATIONS

The following recommendations are proposed to manage any chance finds of historical archaeological remains within the subject site:

Recommendation 1

In the unlikely event that unexpected archaeological material was encountered during works, it would be necessary to stop all work in the immediate vicinity of the identified deposits. The NSW Heritage Council would be notified and a qualified archaeologist would be engaged to assess the significance of the material and recommend whether further investigation is required.

Recommendation 2

In the unlikely event that any Aboriginal objects were discovered during site works, work should cease immediately in the affected area and the Office of Environment and Heritage should be notified, in

accordance with Section 89A of the National Parks and Wildlife Act 1974 (NSW). Further assessment or approval may be required before works could recommence.

6. BIBLIOGRAPHY AND REFERENCES

6.1. BIBLIOGRAPHY

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[Note: Some government departments have changed their names over time and the above publications state the name at the time of publication.]

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APPENDIX A DEVELOPMENT PLANS – BATES SMART ARCHITECTS



Figure 15 – Proposed Street Front



Figure 16 – Proposed south east corner of subject site

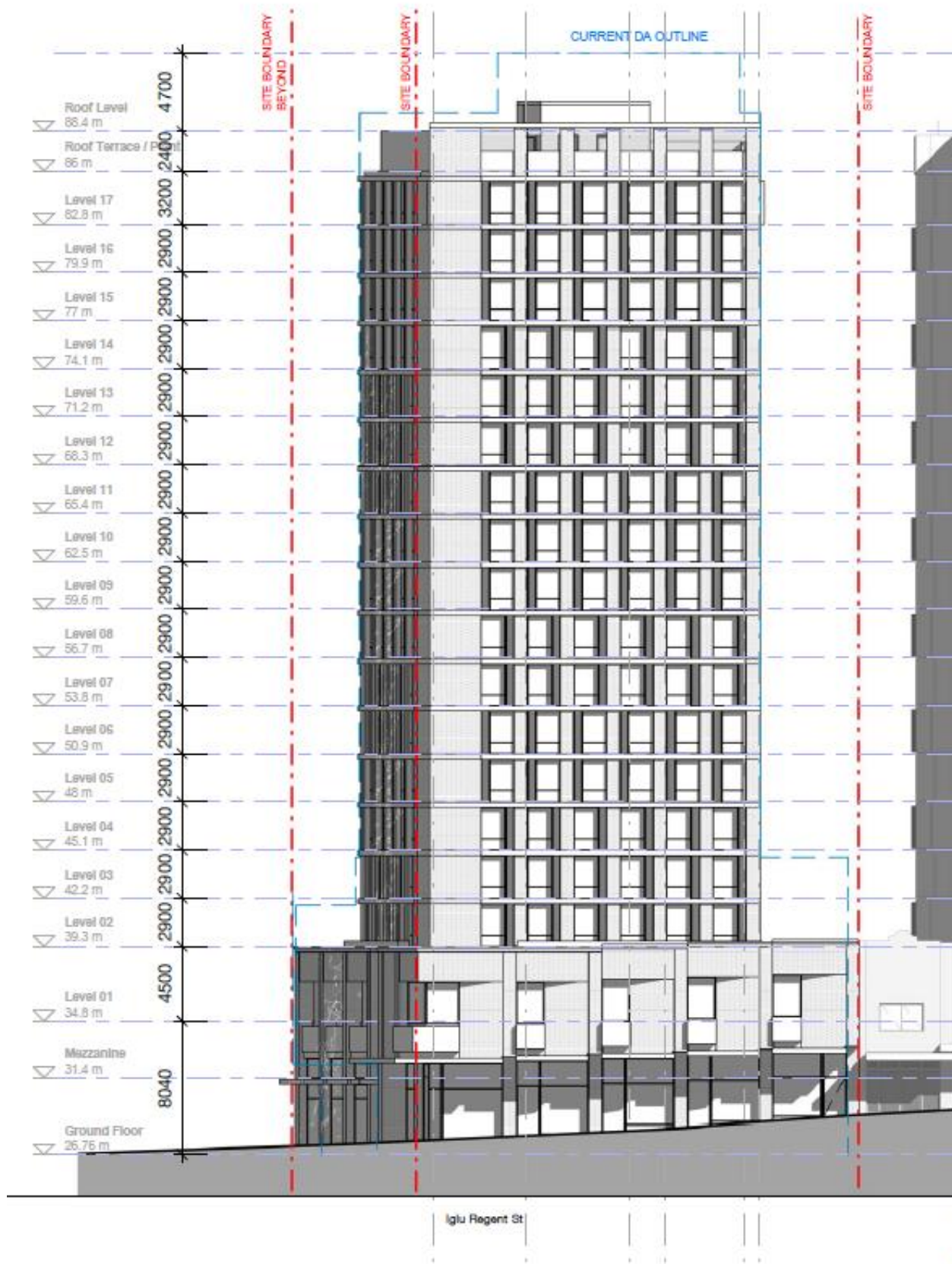


Figure 17 – Excerpt showing Elevation East



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