

Attachment A7

Baseline Archaeological Assessment

51 Riley Street, Woolloomooloo

Baseline Historical Archaeological Assessment

Prepared for Rose Property Group

September 2022 – Final



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1. Introduction

1.1 Project initiation

Extent Heritage Pty Ltd was commissioned by Rose Property Group Pty Ltd to undertake a Baseline Historical Archaeological Assessment of 51 Riley St, Woolloomooloo (hereafter the ‘study area’) in advance of the redevelopment of the site. The proposed development involves the demolition of the extant structure on site and the construction of a seven-storey structure with two basement levels. The report provides a desktop assessment of the site’s potential to contain historical archaeological remains, evaluates their significance and provides recommendations for archaeological management as part of the proposed redevelopment.

1.2 Site location and identification

The site is located at 47–51 Riley Street, Woolloomooloo, NSW, and lies within the City of Sydney LGA. The site is located at Lot 1 DP83489.

The area is bounded by Busby Lane to the north and west, McCarthy Place to the south, and Riley Street to the east (Figure 1 and Figure 2, below).

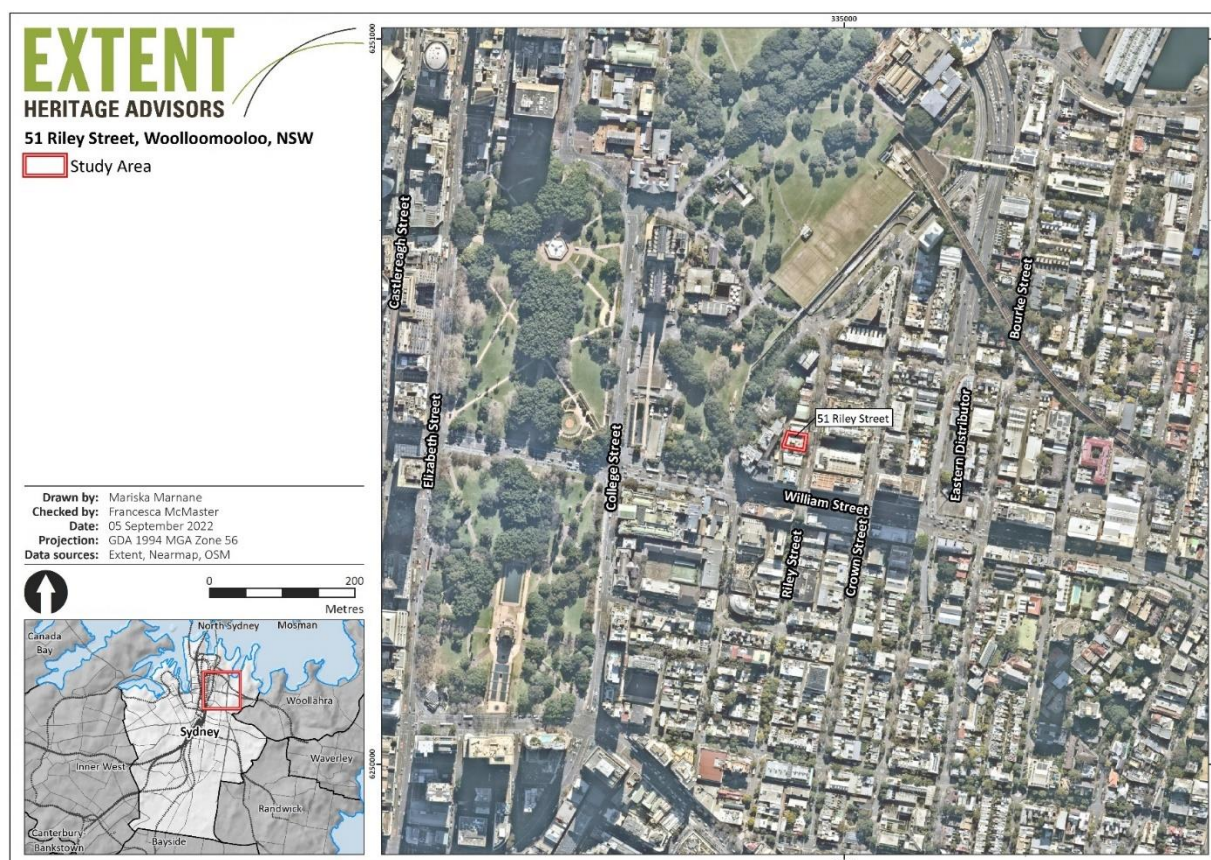


Figure 1. Location of study area within the wider area on present day aerial.



Figure 2. Detail view of study area on present day aerial.

1.3 Development description

The preliminary plans for the redevelopment of the study area involves the demolition of the existing structure and the construction of a seven-storey commercial office building with two basement levels.

1.4 Statutory context

The study area is subject to the following controls:

- *Heritage Act 1977 (NSW)*
- *Environmental Planning and Assessment Act 1979 (NSW) (EPA Act)*
- *City of Sydney Local Environmental Plan 2012.*

1.4.1 Heritage Act 1977 (NSW)

The Heritage Act is designed to conserve the environmental heritage of New South Wales and regulate development impacts on the state’s heritage assets. Significant historical archaeological features are afforded automatic statutory protection by the 'relics' provisions of the Act. In the act, a 'relic' is defined as:

any deposit, artefact, object or material evidence that:

- a) relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement, and
- b) is of State or local heritage significance.

In accordance with section 139(1) of the Heritage Act, it is an offence to disturb or excavate land, where this may affect a relic, without an approval or excavation permit issued by the Heritage Council of NSW, or an endorsed 'exemption' or 'exception' to disturb or expose and destroy a relic. Sites which may contain archaeological relics are usually managed under sections 140 and 141 of the Heritage Act. Sites with potential archaeology, listed on the State Heritage Register (SHR), are managed under sections 60 and 63 of the Heritage Act.

The study area does not contain any items listed on the SHR.

1.4.2 Environmental Planning and Assessment Act 1979

Environmental planning instruments made under the EPA Act include State Environment Planning Policies (SEPPs), that deal with matters of State or regional environmental planning significance, and Local Environmental Plans (LEPs), that guide planning decisions for local government areas. The study area falls within City of Sydney LGA. Currently, the relevant environmental planning instrument is the Sydney Local Environmental Plan 2012 (Sydney LEP 2012).

1.4.2.1 Sydney Local Environmental Plan 2012

The objectives of Sydney LEP 2012 with respect to heritage conservation and archaeological sites are provided in clause 5.10, which (amongst other objectives) aims to conserve archaeological sites and requires consent to demolish, move, or alter known or potential archaeology. Additionally, it requires that consent authority must notify heritage council of this development and take into consideration their response.

The site is not listed as a heritage item on Schedule 5 of Sydney LEP 2012; however, it sits within the Woolloomooloo local Conservation Area C71 (Table 2). The study area is adjacent to Heritage Item I2190 to the north and I2192 to the south and lies opposite I2191 (as shown in Figure 3).

Table 1, below, lists the heritage items in close proximity to the study area.

Table 1. Sydney LEP 2012 listings within the vicinity of the site.

Item	Location	Significance	Item No
Sandstone wall remnant	19-21 Riley Street, Woolloomooloo	Local	I2189
Brandt Bros Ltd, including interior	41 Riley Street, Woolloomooloo	Local	I2190
Former Hastings Deering Building, including interior	46-48 Riley Street, Woolloomooloo	Local	I2191
Lessey's Garage, including interior	55-61 Riley Street, Woolloomooloo	Local	I2192
Peejay's Building, including interior	52-58 William Street, Woolloomooloo	Local	I2198
William Street Arch, including retaining walls	70B William Street, Woolloomooloo	Local	I2199
Cook & Phillip Park including Earth Mother play sculpture	Cook & Phillip Park, Sydney	Local	I1655

Table 2. Heritage conservation zones that the study area falls within.

Name	Suburb	Significance	Listing number
Woolloomooloo	Woolloomooloo	Local	C71

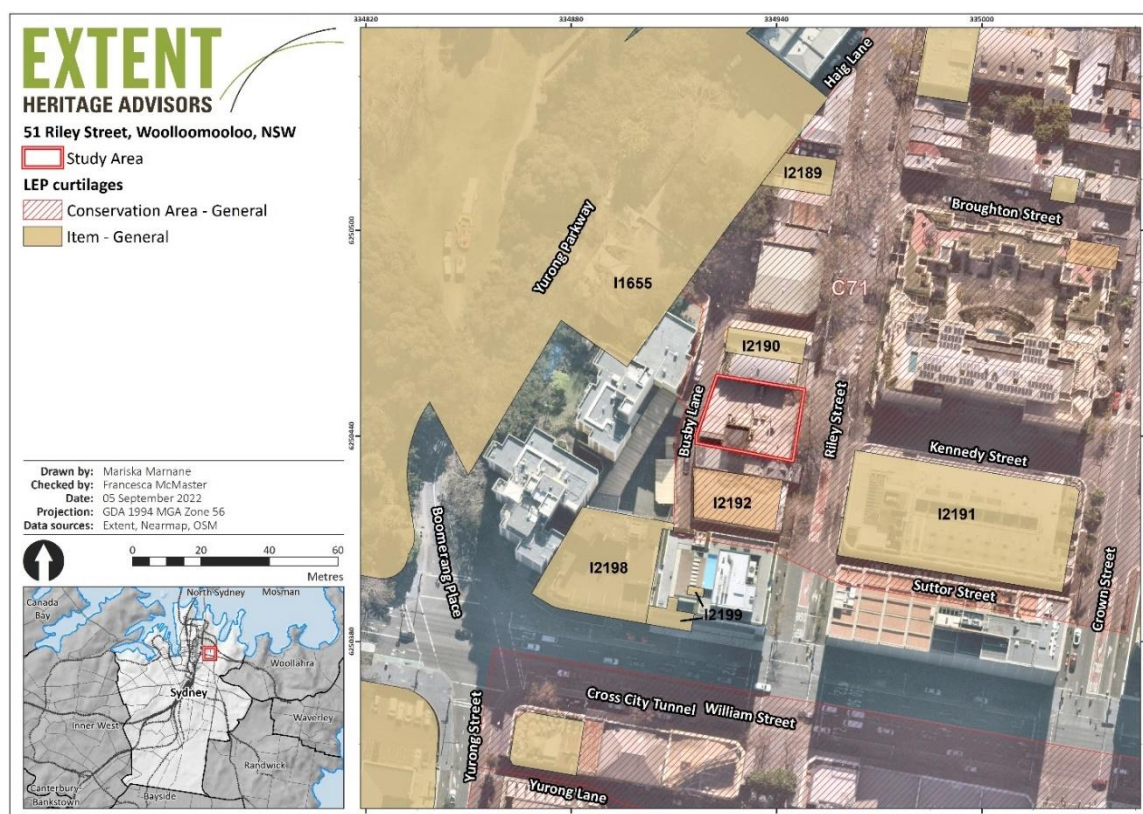


Figure 3. Conservation areas and locally listed heritage items referenced in Table 1, shown in relation to the study area.

1.5 Previous reports and investigations

The study area has not been subject to any previous archaeological assessments or investigations. This report mainly draws on the following studies undertaken in nearby areas:

- AHMS. 2002. '60–70 William Street East Sydney NSW, Historical Archaeological Assessment.' Unpublished report prepared for Zonie Constructions & Design and Weir & Phillips Architects.
- AHMS. 2013. 'Burton Street Tabernacle Darlinghurst, Historical Archaeological Excavation Report.' Unpublished report prepared for Kane Constructions.
- GML Heritage. 2004. '76–88 Crown Street Woolloomooloo, Archaeological Assessment and Research Design.' Unpublished report prepared for Buildcorp.

1.6 Approach and methodology

This report was prepared in accordance with the principles and procedures established by the following documents:

- *The Australia ICOMOS Charter for Places of Cultural Significance, 2013* (Australia ICOMOS 2013) (the *Burra Charter*);

- 'Assessing Significance for Historical Archaeological Sites and 'Relics' (Heritage Branch, formerly Department of Planning [NSW] 2009); and
- 'Historical Archaeology Code of Practice' (Heritage Council 2006).

1.7 Limitations

This report uses historical documentation prepared by third party heritage consultants to describe and assess the heritage significance of land that would be affected by the proposal. This report does not review the Aboriginal cultural heritage values of the study area—this component of the project is dealt with in a separate report: '51 Riley Street Woolloomooloo Due Diligence' (Extent Heritage 2022).

1.8 Author Identification

This report was prepared by Clare Fitzpatrick (research assistant), with mapping provided by Mariska Marnane (GIS specialist). It was reviewed by Graham Wilson (principal heritage advisor).

2. Historical context

2.1 Introduction

This section of the report relies largely on the historical research contained within previous reports carried out in the vicinity of the study area, as well as detailed analysis of historical plans and aerials. It provides a summary of the main phases of historical development, and sufficient historical background to provide an understanding of the place to assess the significance and provide relevant recommendations. It is not intended as an exhaustive history of the site.

2.2 Gadigal Country

The Gadigal, also known as Cadigal and Caddiegal, are the traditional owners of the land on which inner city Sydney, including the study area, are located on. The land sustained lives and communities for countless generations, providing a storehouse of resources from not only the coastline, harbours and rivers, but also the freshwater wetlands and dunes. Aboriginal presence around this area is evident through the presence of stone tools, middens, grinding grooves, and rock art, while community histories preserve knowledge and stories relating to the region. For further information on the Aboriginal people of the area, refer to '51 Riley Street Woolloomooloo: Aboriginal Heritage Due Diligence' (Extent Heritage 2022).

2.3 Colonisation

Every facet of life for the Gadigal, and other Aboriginal groups in the Sydney region, changed dramatically following British colonisation. Dispossession of traditional lands, restrictions to resources, the environmental impacts of clearing and settlement, diseases, and violence resulted in a complete disruption for Aboriginal groups.

At the time of colonisation, the landscape surrounding the study area ranged from large tracts of open forests and dense shrubland to dunes and wetlands. (Marriott 1988, 44). In February 1788, Governor Arthur Phillip recorded a description of the area between Sydney Cove and Botany Bay, with the first portion 'occupied by a wood, in some parts a mile and a half, in others three miles across', and described the area beyond that as a 'kind of heath, poor, sandy, and full of swamps' (Phillip 1789, Feb 1788).

By the early nineteenth century, the landscape described by Phillip had been dramatically altered. Colonial artist Joseph Lycett's 1819 watercolour (Figure 4, below) looks out to Sydney including the area of Woolloomooloo, from Surry Hills, depicting a fenced and bare field with cleared trees in the foreground. The area had been plundered for timber, slate, clay, and stone for use as building materials in the city, while early farmers stumped and burnt the trees to open up grazing land for sheep and cattle.



Figure 4. Joseph Lycett's 1819 Sydney from Surry Hills. Source: ML SLNSW.

2.4 Early land grants (1793–1843)

2.4.1 The Woolloomooloo Estate (1793–1821)

In 1793, John Palmer was granted 100 acres of land immediately east of the boundary line for the township of Sydney that had been established by Phillip the previous year (Figure 5, below) (Keating 1991, 15). Palmer's land grant, known as 'Wall-loo-moo-loo Farm', encompassed Woolloomooloo Bay, forming a rectangular block down to William Street (Land Grants Guide, 51). It is on part of this grant that the study area is located. The grant stipulated that Palmer was to reside within the area, as well as carry out 'improvement and cultivation' on the land (Land Grants Guide, 51). Consequently, Palmer built Woolloomooloo House in 1801 and operated a brickworks on the estate, utilising the streams that ran into Woolloomooloo Bay. By 1800, Palmer's estate grew to 300 acres through the acquisition of farms in the neighbouring areas of Surry Hills and Darlinghurst (AHMS 2013, 23).

Following the Rum Rebellion in 1808 and the fall of Governor Bligh, Palmer lost his position as Commissary General and returned to England to give evidence in Bligh's trial. His prolonged absence sent him into increasing debt and upon his return to Sydney in 1814 he was forced to both lease and mortgage Woolloomooloo Estate (AHMS 2013, 24).

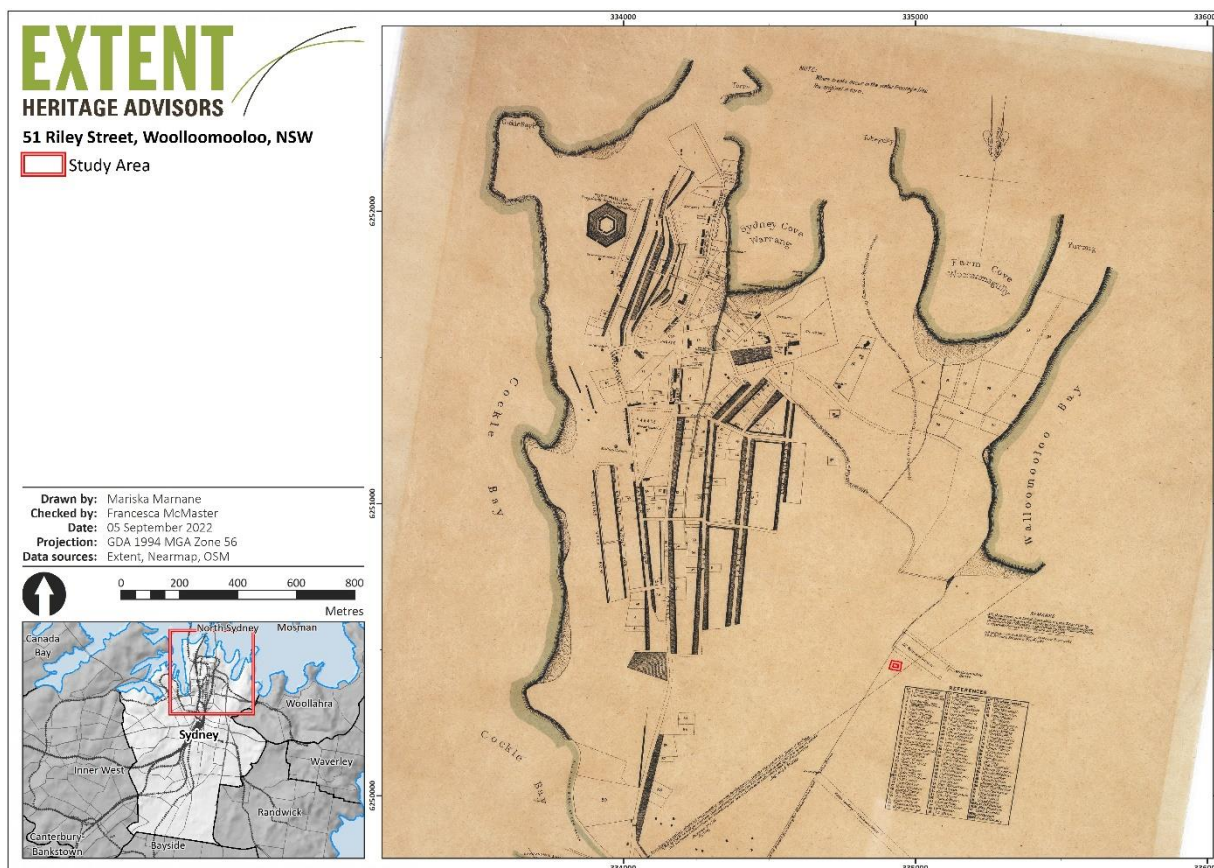


Figure 5. Meehan's 1807 *Plan of the town of Sydney in New South Wales*, showing Palmer's Woolloomooloo Estate, with the study area marked in red. Source: NLA <http://nla.gov.au/nla.obj-229911438>.

2.4.2 The Riley Estate (1822–1843)

In 1822 Palmer sold the Woolloomooloo Estate to Ann Riley, the wife of merchant Edward Riley, and the land was incorporated into the Riley Estate. The Rileys began buying up allotments to the east of Sydney from 1814, and by 1822 had amassed pockets of land throughout Surry Hills and Darlinghurst (Dyster 1989, 26). Following Edward Riley's death in 1825, conflicting wills and years of litigation tied up the estate which precluded subdivision and further settlement (AHMS 2013, 26). An early subdivision plan dated to c.1834 (shown in Figure 6, below) shows measured allotments and named streets and lanes in the area bounded by the Government Domain, Riley Street, and William Street. However, it was not until a decree from the Supreme Court in Equity in July 1844 that the Riley Estate, including the original Woolloomooloo land grant to Palmer, was divided into parcels of equal value and raffled among the beneficiaries of his will (AHMS 2013, 26).

2.5 Subdivision and urban development (1844–1901)

The subdivision of the Riley Estate was carried out following a regular grid pattern comprised of new roads that were unlinked with the parkland to the west and to the residential areas in the east (Figure 7). The site formed part of the lot inherited by Charles Riley referred to as block number 23F of the Riley Estate. The triangular block was bounded by Riley Street and William

Street, and cut diagonally by a stone wall delineating the Government Domain (Figure 7). Between 1830 and 1850, Sydney grew rapidly and began to extend beyond the former boundaries laid out by Phillip in 1792, creating a demand for housing. Alongside Surry Hills and Darlinghurst, Woolloomooloo comprised the largest areas of freehold land adjacent to the township available for rapid development (Kass 1984, 4). Urban development in the area further intensified during the 1860s with the establishment of wharves in Woolloomooloo Bay.

The block of land today bounded by Riley Street and Busby Lane does not appear developed in Well's 1843 Map of Sydney, but is clearly legible in 1854 Woollcott and Clarke's Map of Sydney (Figure 8) and in the Trigonometrical Survey of Sydney undertaken between 1855 and 1865 (Figure 9). In this survey, the lots at 47 and 51 Riley Street contain multiple structures, whereas number 49 remains largely vacant. 47 Riley Street contains a brick building facing the street, and two wooden structures in the rear yard. 49 Riley Street is notably vacant, but a closer look shows an L-shaped yard, running along the side and around the back of number 47, with a brick building facing the rear lane. 51 Riley Street contains a brick building facing the street, with a wooden building in the yard along with another small structure of unknown fabric.

The historical creek line of Yurong Creek can also be seen in all the aforementioned surveys (Figure 7, Figure 8, and Figure 9) running along Busby's Lane (formerly Gay's Lane), west of the study area. The filling of Yurong Creek occurred at some point in the mid-to-late nineteenth century and is absent from the 1888 Rygate & West Survey (Figure 10). It is referenced in a letter dated 9 August 1884 by Pierce Healy, stating that a portion of his land at 41 Riley Street was originally a creek but was now filled up, adding that the whole allotment was raised by three feet (0.90 m) (Healy 1884).

By the 1880s Woolloomooloo had become a major shipping hub for timber and road metal cargoes, and alongside densely packed worker's cottages, warehouses were erected to facilitate the transport of goods (Figure 11). Despite this, the 1888 Rygate & West Survey (Figure 10) shows the lot at 49 Riley Street vacant. 47 Riley Street contains a single-story brick building facing the street, with verandahs at the front and back. The two wooden structures seen in the 1865 Trigonometrical Survey are no longer present, and the yard is separated into two sections. The L-shaped yard with the rear brick building is still present, however is significantly narrower and appears to be incorporated into the lot at 47 Riley Street. The plan shows a three-storey brick building at 51 Riley Street, with wooden, iron, and brick outbuildings in the yard. The land at 49 Riley Street remained vacant for quite some time, with the first record of occupancy appearing in the 1900 Sands Directory. At this time, 49 Riley Street had a commercial listing, occupied by J McCarthy & Co (copper, case, and cask merchants), while the neighbouring lots appear to be residential (Sands Directory 1900).

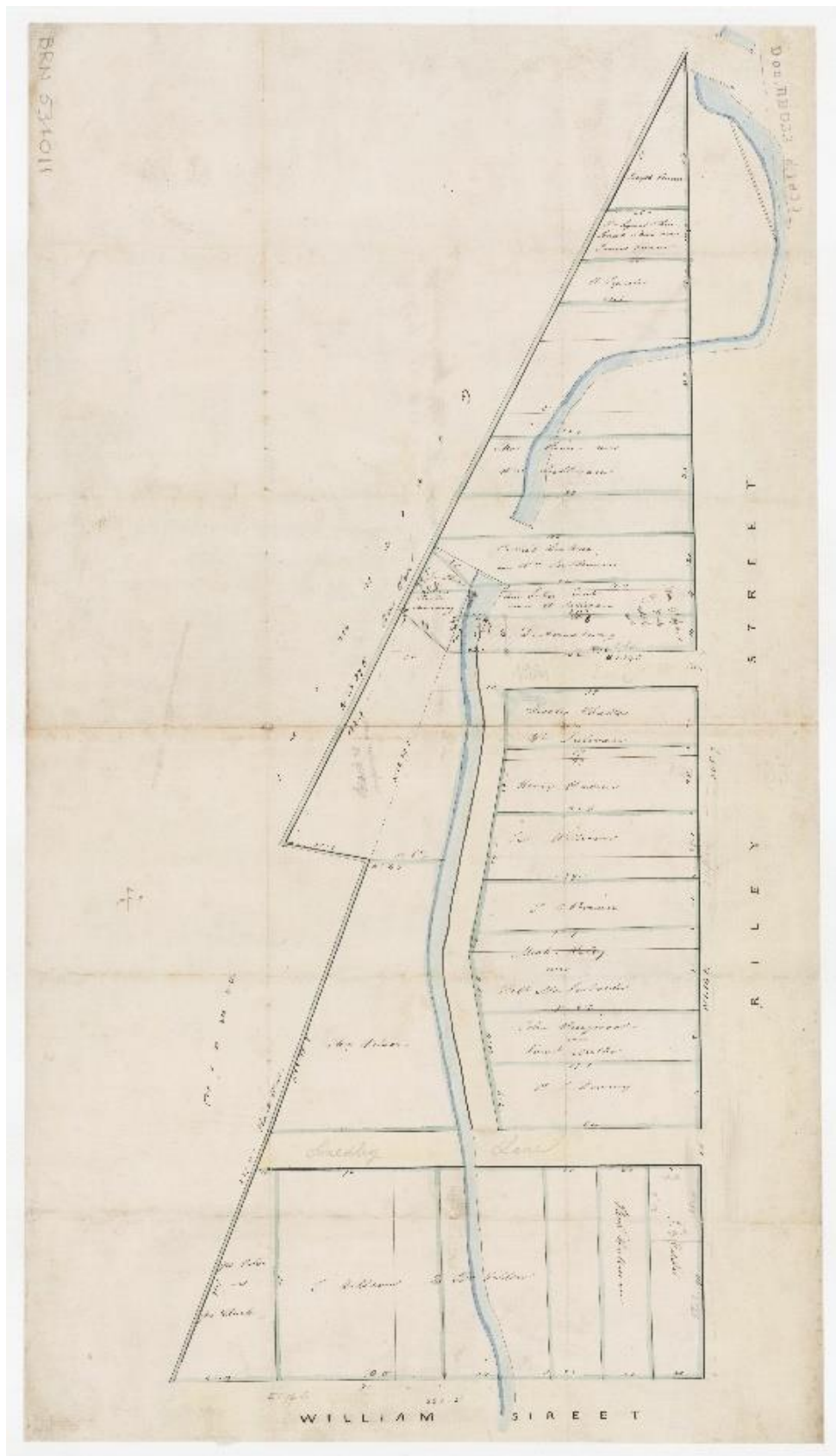


Figure 6. Early subdivision plan of block F23 in the Riley Estate (dated to c.1834) which contains the study area. Source: SLNSW (<https://collection.sl.nsw.gov.au/record/74VK2Nqv2z4b>).

Note: The triangular block is bounded by Riley Street, William Street and the boundary for the Government Domain.

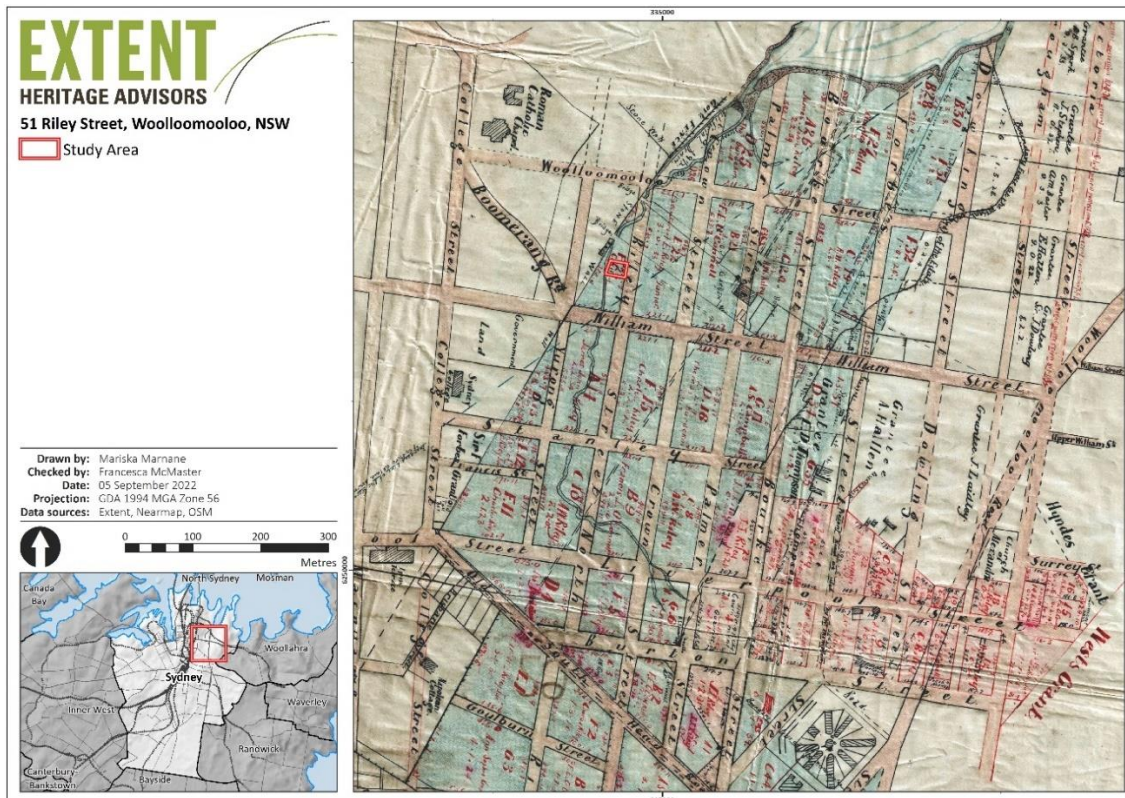


Figure 7. Detail of the 1844 Riley Estate Plan showing the new subdivision laid out in a regular grid pattern, with the study area highlighted in red. Source: City of Sydney Archives (<https://archives.cityofsydney.nsw.gov.au/nodes/view/63143>).

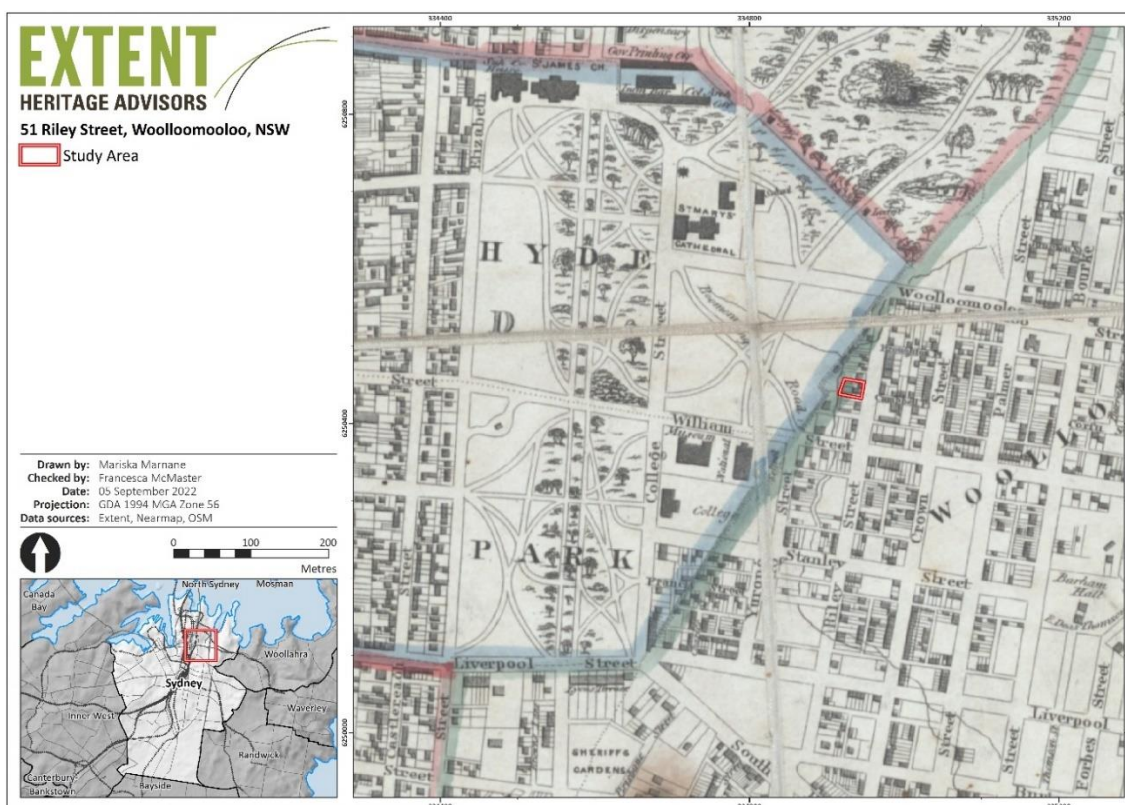


Figure 8. Detail of the 1854 Woolcott & Clarke's Map of the City of Sydney showing development on and in the vicinity of the study area (marked in red). Source: NLA (<http://nla.gov.au/nla.obj-230681967>).

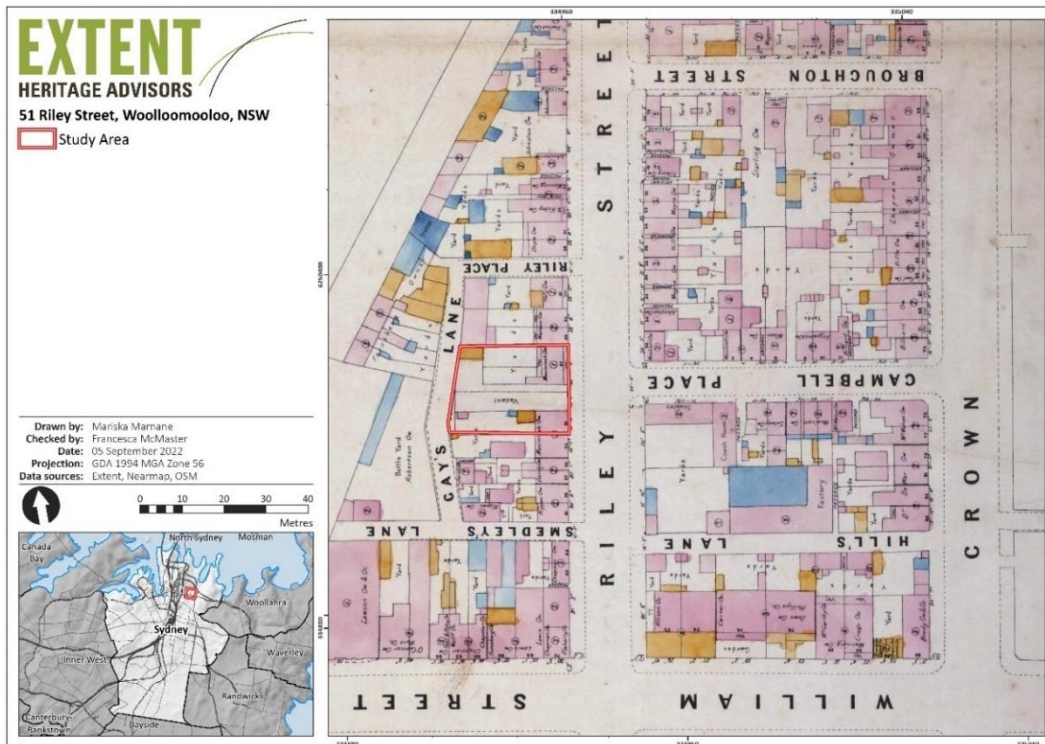


Figure 9. The 1865 Trigonometrical Survey of Sydney showing the study area. *Source:* City of Sydney Archives.

Note: 47 and 51 Riley Street both contain brick structures facing Riley Street, with wooden outbuildings in the yard. In the middle of the study area is the vacant L-shaped 49 Riley Street, with a brick building at the rear fence of 47 Riley Street along Busby's Lane (formerly Gay's Lane).

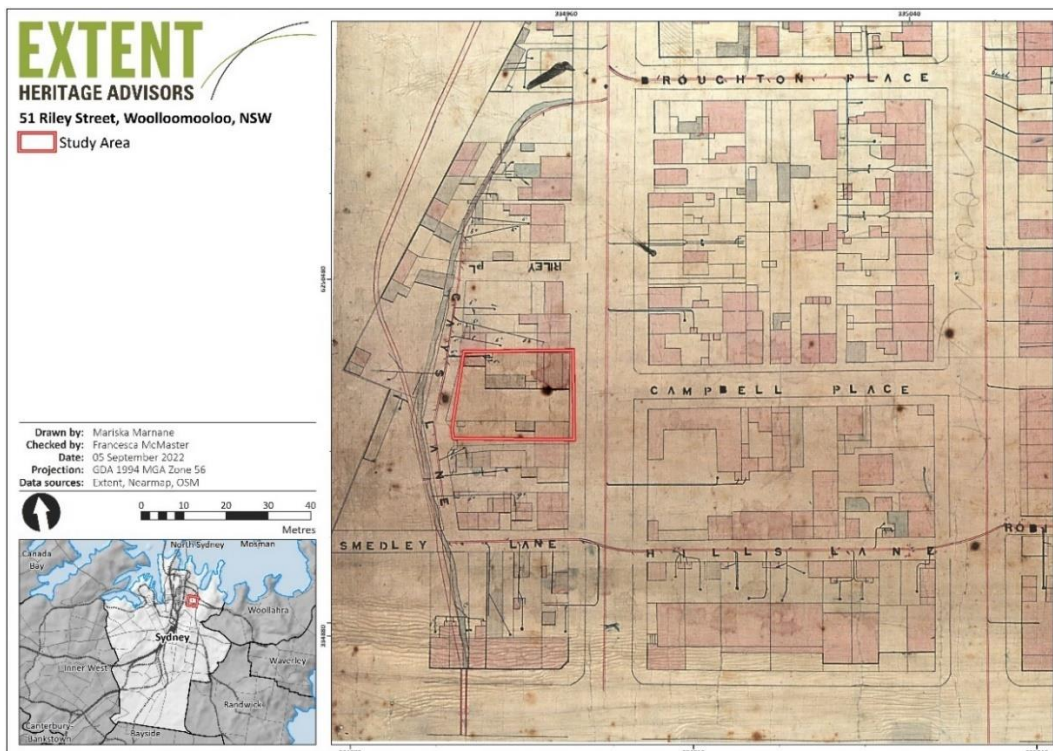


Figure 10. The 1888 Rygate and West Plan of Sydney. *Source:* City of Sydney Archives.

Note: The plan shows a series of structures on the study area at 47 and 51 Riley Street similar to those in the 1865 Trigonometrical Survey of Sydney. 49 Riley Street is labelled "Vacant".

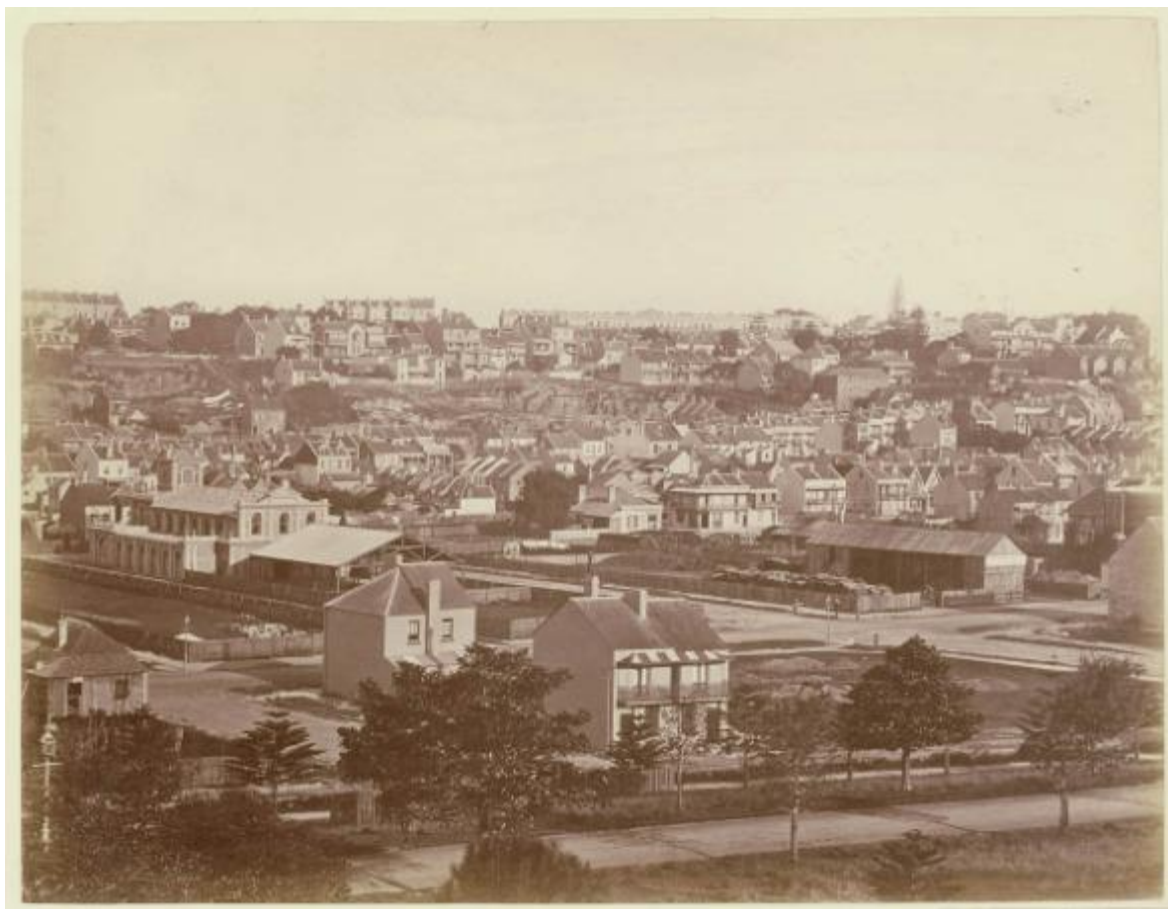


Figure 11. Photograph of Woolloomooloo c.1875–1885 filled with working class housing. *Source:* SLNSW (<https://collection.sl.nsw.gov.au/record/9PQ8aP3n>).

2.6 Twentieth century industrial development (1902–present)

By 1902, the lots at 47 and 49 Riley Street were combined, and AN Steenbhom, Coach and Buggy Builder was listed as the occupant (Sands Directory 1902). In 1909, the final lot of the study area, 51 Riley Street, was incorporated into what was now called Steenbhom Limited, Motor Car and Carriage Manufacture (Sands Directory 1909). From then on, the study area was referred to as one lot, 51 Riley Street, and was home to a series of commercial buildings, including garages, factories, and workshops (Development Application Files 1959; Sands Directory 1921, Sands Directory 1932.)

A building survey card from 1945 describes the building that occupied the site prior to the extant structure and can be seen in the 1943 aerial (see Figure 12 and Figure 13, below). The front of the building was single-storey, and the rear of the building on Busby Lane was two storeys. The building is described as having brick bearing walls, wood floors, and fixed windows, with a floor plan of approximately 550 m². The site card lists the building as ‘about 70 years old’, however this is unlikely considering that it is not captured in the 1888 Rygate & West Survey and the lots remained primarily residential up until 1902 (Building Survey Card 1945; Sands Directory 1902). Additionally, considering that number 49 Riley Street wasn’t listed as inhabited until 1900, and the three lots remained separate until 1909, the pre-1943 structure most likely dates closer to 1909 (Sands Directory 1900; 1902; 1909).

Building application plans from 1965 show the approved development of the current office building at 47–51 Riley Street (Building Application Plans 1965). The building inspectors card documents the demolition of the previous building, pictured in the 1943 aerial (Figure 12, above) and details the construction of the current building, as seen in the 1971 aerial (Figure 14, below) over the course of eighteen months. This included the construction of a 3.3 m deep basement that occupied the entire footprint of the study area (579 m²) (Figure 15, below).



Figure 14. 1978 aerial photograph showing further demolition and development within the study area, in particular the large skyscraper on the north site of William Street. *Source:* NSW Department of Finance and Spatial Services.

2.7 Summary of phases of development

Based on the historical research undertaken, the following broad post-1788 historical phases of site development were identified:

- Phase 1 (1793–1843): Early land grants;
- Phase 2 (1844–1901): Subdivision and residential development; and
- Phase 3 (1902–present): Twentieth century industrial development.

3. Historical archaeological resources

3.1 Preliminary evaluation of archaeological potential

The study area has been subject to historical development since at least 1793, when the first historical land grants were made and land clearing commenced. Multiple commercial developments throughout the twentieth century likely entirely removed archaeological evidence of all phases of occupation on the site. Historical research has indicated that the study area saw a range of development through the mid-to-late nineteenth century and into the twentieth century.

The earliest period of historical occupation of the area in Phase 1 (1793–1843) is likely to have principally consisted of land clearing with no evidence for development during this period. Considering that activities on the site during this phase would have been ephemeral in nature and are unlikely to have left an archaeological signature, there is nil-to-low potential for archaeological remains to survive from Phase 1 (1793–1843).

There is also nil-to-low potential for archaeological remains from Phase 2 (1844–1901) to survive. Remains may include structural remains associated with residential development at 47 and 51 Riley Street, as well as any associated artefactual deposits. Deeper subsurface features, such as wells, cisterns, cesspits, and some service lines would have a higher rate of survivability. They would present in the form of structural elements and contents consisting of artefact bearing deposits. It is possible that the study area was raised by introduced fill during the second half on the nineteenth century, similar to historical references on 41 Riley Street to the north and excavations at 70 William Street to the south, that would increase the survivability of earlier deposits (Healy 1884; AHMS 2002). However, the level of development within the study area, including the construction of the pre-1943 building and the extant 1966 building, would reduce the potential for such archaeological evidence to nil-to-low.

Twentieth century development (Phase 3, 1902–present) remains largely extant, with the current structure built in 1966 still present. This building replaced the pre-1943 building, likely built c.1909 when all three parcels of land were combined into one lot. The pre-1943 building and the basement of the current building is considered likely to have removed deposits with the potential for archaeology.

In summary, the high level of disturbance in the study area has reduced the potential for archaeological remains associated with the mid to late nineteenth century development to nil to low

3.2 Assessment of historical archaeological significance

Assessment of historical archaeological significance refers to the heritage significance of known or potential archaeological remains. While they remain an integral component of the overall significance of a place, it is necessary to assess the archaeological resources of a site independently from aboveground and other heritage elements. Assessment of archaeological significance is more challenging, as the extent and nature of the archaeological features is often unknown, and judgment is usually formulated on the basis of expected or potential attributes.

The following significance assessment of the study area’s archaeological resource is carried out by applying criteria expressed in the publication ‘Assessing Significance for Historical Archaeological Sites and ‘Relics’, prepared by the Heritage Branch, formerly Department of Planning (NSW) (now Heritage NSW) (Department of Premier and Cabinet in December 2009).

3.3 Existing statements of significance

There are currently no items of local heritage significance within the study area, and therefore there is no existing statement of significance.

3.3.1 NSW Heritage Criteria

The seven criteria for assessment of heritage significance developed by the NSW Heritage Council include:

Criterion (a)	An item is important in the course, or pattern, of the cultural or natural history of NSW or local area.
Criterion (b)	An item has a strong or special association with the life or works of a person, or group of persons, of importance in NSW’s or local area cultural or natural history.
Criterion (c)	An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW or local area.
Criterion (d)	An item has a strong or special association with a particular community or cultural group in NSW or local area for social, cultural or spiritual reasons.
Criterion (e)	An item has potential to yield information that will contribute to an understanding of NSW’s or local area cultural or natural history.
Criterion (f)	An item possesses uncommon, rare or endangered aspects of NSW’s or local area cultural or natural history.
Criterion (g)	An item is important in demonstrating the principal characteristics of a class of NSW or local areas: Cultural or natural places; or Cultural or natural environments.

To facilitate assessment of archaeological significance these criteria have been grouped in four categories as follows: To assist the assessment of archaeological significance, the NSW heritage criteria are assembled into the following four groups:

- archaeological research potential (NSW Heritage criterion E);
- association with individuals, events, or groups of historical importance (NSW Heritage criteria A, B, and D);
- aesthetic or technical significance (NSW Heritage criterion C); and

- ability to demonstrate the past through archaeological remains (NSW Heritage Criteria A, C, F, and G).

The above assessment criteria are supplemented by the established assessment framework that has been developed by Anne Bickford and Sharon Sullivan (1984), who set three fundamental questions to assist in determining the research potential of an archaeological site. These questions are as follows:

- Can the site contribute knowledge that no other resource can?
- Can the site contribute knowledge that no other site can?
- Is this knowledge relevant to general questions about human history or other substantive questions relating to Australian history, or does it contribute to other major research questions?

As part of this baseline assessment, a synthesised evaluation of significance is expressed in the statement below.

3.3.2 Preliminary statement of significance

Although the study area forms part of the early land grants of the Woolloomooloo Estate and Riley Estate, the potential for archaeological resources from Phase 1 (1793–1843) has been assessed as nil-to-low, with activities likely to have been ephemeral in nature resulting in little archaeological signature.

The principal archaeological phase in which remains may survive is from the development of the area during Phase 2 (1844–1901). Following the subdivision of the Riley Estate in 1844, residential development occurred in the study area at 47 and 51 Riley Street. These pre-1865 and pre-1888 buildings and outbuildings would be significant at a local level for their ability to provide information about the early establishment Woolloomooloo, the people who occupied the buildings, their activities, and their everyday life. Deeper subsurface features such as wells, cisterns, cesspits, and their contents consisting of artefact bearing deposits would also be of local significance for their ability to provide additional information about the people who used the sites and the activities taking place in different spaces.

Development of the study area in Phase 3 (1902–present) is principally associated with commercial use of the study area, including the demolition of the pre-1865 and pre-1888 buildings, and the construction of the pre-1943 building which encompassed 47–51 Riley Street. This period also saw the pre-1943 building's demolition in 1965, and the construction of the extant structure in 1966, including a basement level. Occupation deposits from the first half of the twentieth century are unlikely survive due to the construction of this basement level.

4. Assessment of development impacts

4.1 Proposed development

The preliminary plans for the redevelopment of the study area involves the demolition of the existing 1966 structure and the construction of a seven-storey commercial office space with two basement levels for carparking and storage.

The proposed development will have a three-storey street wall facing Riley Street and a two-storey street wall at the rear in Busby's Lane, with the further four-storeys recessed above (Figure 17). The new building's footprint will encompass the same footprint as the 1966 structure (579 m²) which is the entire footprint of the study area (Figure 15 and Figure 16). The current basement level of 3.3 m deep will be extended to a depth of 6.5 m in order to accommodate two basement levels.

4.2 Potential archaeological impact

The proposed redevelopment of the study area would see the demolition of the existing structure and ground disturbance, including significant excavation, for the construction of the new commercial office building with two basement levels. Excavation for the basement levels would result in the total removal of any archaeological remains that may be present in the study area. However, given the current basement reaches a depth of 3.3 m and encompasses the entire footprint of the site, it is highly likely that any surviving archaeological remains were already removed during its construction in 1966. Additionally, although the pre-1943 commercial building had no basement levels, its footprint encompassed approximately 95 per cent of the study area, and therefore is also likely to have impacted any pre-1888 structures.

In summary, as there is nil-to-low potential for the survivability of archaeological resources across all phases of occupation, the proposed redevelopment is likely to have no archaeological impact.

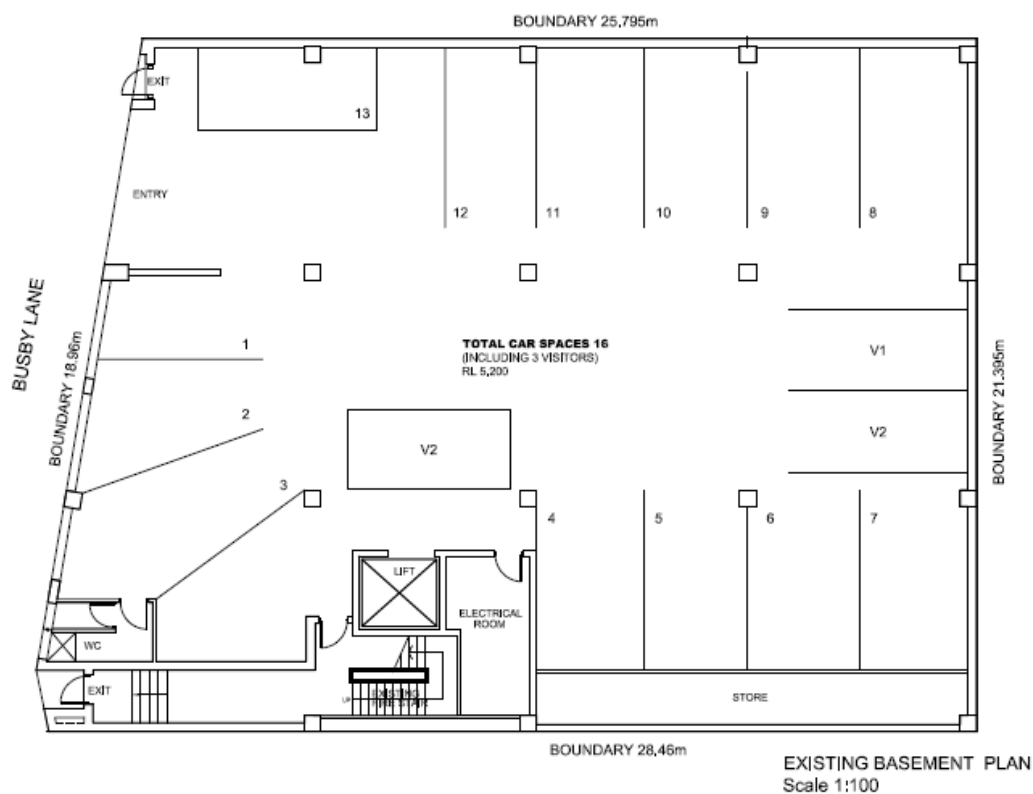


Figure 15. Basement plan for the existing building (1966 structure). The basement floorplan encompasses the entirety of the study area. *Source:* Rose Property Group.

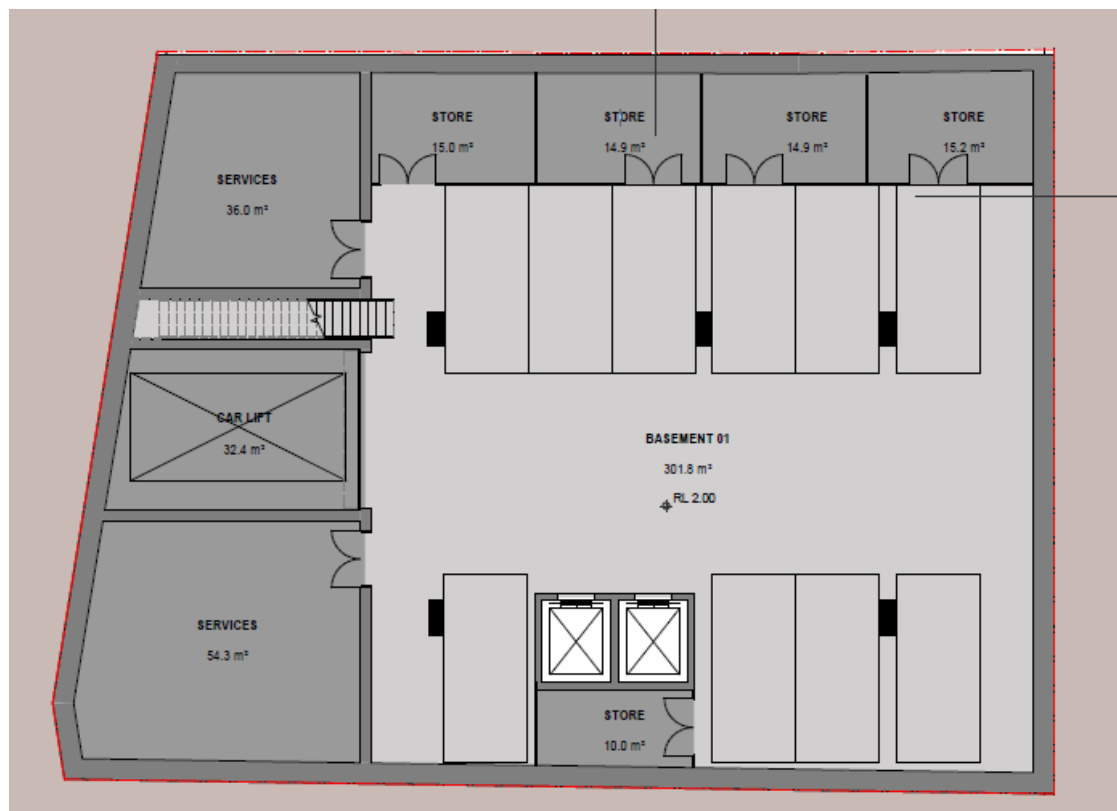


Figure 16. Basement plan for the proposed development. The basement floorplan matches the existing floorplan, encompassing the entirety of the study area. *Source:* Rose Property Group.

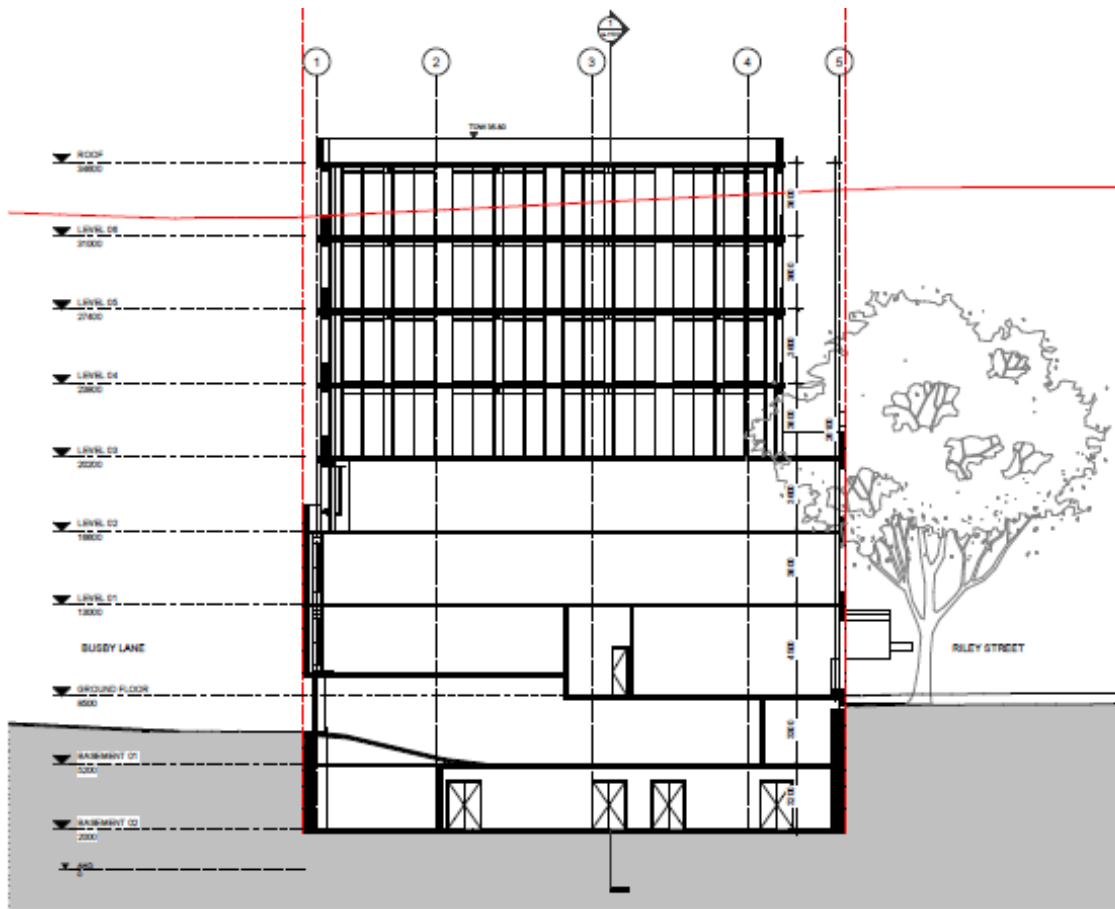


Figure 17. Section of the proposed development, showing the seven storeys and two basement levels.
Source: Rose Property Group.

5. Conclusions and recommendations

5.1 Conclusions

The following conclusions have been reached in regard to the historical archaeological potential of the study area:

- The study area contains no locally significant heritage items listed on the Sydney LEP 2012.
- The study area was outside the boundary of the original township of Sydney, and was part of the land grant made to John Palmer in 1792, known as the Woolloomooloo Estate or Farm. In 1822, the study area was incorporated into the Riley Estate.
- Residential development in the study area didn't occur until after 1844, when the Riley Estate was subdivided. The first record of development can be seen in an 1854 plan, with later plans from 1865 and 1888 detailing the dwellings and outbuildings at 47 and 51 Riley Street.
- In the twentieth century, the three blocks of land were combined into one lot and used for a series of industrial and commercial purposes.
- The study area has nil-to-low potential for archaeological remains associated with Phase 1 (1793–1843) of historical development of the study area, and nil-to-low potential for archaeological remains associated with Phase 2 (1844–1901).
- The high level of disturbance during Phase 3 (1902–present) has reduced the potential for historical deposits from previous phases to nil-to-low. This disturbance includes the construction of the pre-1943 building and the construction of the basement of the current building, built in 1966.
- Assessment of the proposed redevelopment of the site indicates that historical deposits are unlikely to be encountered during the construction of the new building, including the two basement levels reaching a depth of 6.5.

5.2 Recommendations

The following recommendations regarding the impact of the proposed development have been made:

- Due to the level of disturbance that occurred on the site during the twentieth century, and the nil-to-low potential for archaeological resources, there is no recommendation for further study or test excavation.
- It is recommended that an Unexpected Finds Procedure be put in place (details of this procedure can be supplied by Extent Heritage), setting out how any unanticipated archaeological object(s) would be managed if they are encountered during the course of the proposed development.

- In the event that unexpected historical archaeological remains are discovered at the site, all works in this area should cease and Heritage NSW should be notified, in accordance with section 146 of the Heritage Act. These remains would be assessed in a timely manner and a determination on management would be made in consultation with Heritage NSW.
- In the event that evidence of the Aboriginal occupation of the site is identified during any phase of onsite works, all works in the affected area should stop, the area adequately protected and OEH informed about the discovery under section 89(A) of the National Parks and Wildlife Act.

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