



Health Infrastructure

HISTORICAL HERITAGE ASSESSMENT

Maitland Mental Health Rehabilitation (MMHR)
Project

FINAL

October 2024



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Prepared by
Umwelt (Australia) Pty Limited
on behalf of
Health Infrastructure

Project Director: Tim Adams
Project Manager: Karyn Cook
Report No. R01
Date: October 2024



75 York Street, Teralba, NSW, 2284



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Acknowledgement of Country

Umwelt would like to acknowledge the traditional custodians of the country on which we work and pay respect to their cultural heritage, beliefs, and continuing relationship with the land. We pay our respect to the Elders – past, present, and future.

Cover Image: Pre 1955 photograph of the brickworks (Maitland City Council, Local Studies)

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Table of Contents

1.0	Introduction	1
1.1	Site Description	1
1.2	Aims	1
1.3	Statement of Significance	2
1.4	REF Deliverable Requirement Reporting	2
1.5	Methodology	3
1.6	Authorship	3
2.0	Statutory and Assessment Context	6
2.1	The Heritage Act 1977 (NSW)	6
2.1.1	Relics Provision of the Heritage Act 1977	6
2.2	Environmental Planning and Assessment Act 1979	7
2.3	Relevant Guidelines/Policies	7
2.3.1	The Burra Charter: The Australian ICOMOS Charter for Places of Cultural Significance (2013)	7
2.3.2	NSW Heritage Manual	7
2.3.3	Assessing Heritage Significance Guidelines	7
2.3.4	Preparing a Statement of Heritage Impact (SoHI)	8
2.3.5	Archaeological Assessment Guidelines	8
2.3.6	Assessing Significance for Historical Archaeological Sites and ‘Relics’	8
3.0	Relevant Heritage Listings	9
3.1	‘Government Railway’ – Locally Listed Heritage Item	9
4.0	Historical Context	12
4.1	A Brief History of Maitland	12
4.1.1	Initial Settlement	12
4.1.2	Brickmaking in East Maitland	13
4.1.3	The Suburb of Metford	14
4.2	The Project Site and the Turton Brickworks	14
4.2.1	The Western Precinct: 1882 Onwards	17
4.2.2	The Eastern Precinct: c. 1930s	19
4.2.3	The Consolidated Brickworks: c. 1940s Onwards	20
4.2.4	PGH Industries: 1969 Onwards	22
4.3	The Government Railway	23
5.0	Previous Investigations of the Turton Brickworks	25

5.1	HLA-Envirosciences, 2003, A Heritage Assessment of Proposed Works, PGH Brickworks, Metford, prepared for PGH	25
5.2	Umwelt, 2004, Archival Recording and Archaeological Investigation of the Chimney Stack at PGH Brickworks, Metford, prepared for CSR Building Products Limited	27
5.3	Nexus Archaeology & Heritage, 2005, Assessment of Historical Archaeological and Research Design: Part of the PGH Brickworks Plant, Metford, NSW, prepared for PGH Bricks and Paving	27
5.4	Eureka Heritage, 2011, Statement of Heritage Impacts: Demolition of Standing Buildings, Former CSR-PGH Brickworks, Metford, prepared for ADW Johnson & CSR Building Products Limited	29
6.0	Visual Inspection	30
6.1	Results	30
7.0	Assessment of Built Heritage	35
7.1	Listed Heritage Items	35
7.2	Built Heritage within the Project Site	36
7.3	Identified Opportunities and Constraints	37
8.0	Assessment of Historical Archaeological Potential	38
8.1	Assessment of Historical Archaeological Potential	38
8.2	Assessment of Historical Archaeological Significance	38
8.3	Identified Opportunities and Constraints	39
9.0	Impact Assessment	40
9.1	Potential Historical Heritage Impacts	40
9.1.1	Built Heritage	40
9.1.2	Historical Archaeological Resource	40
10.0	Conclusions and Recommendations	41
10.1	Recommendations and Mitigation Measures	41
11.0	References	42
11.1	References	42
11.2	Newspaper Articles	42

Figures

Figure 1.1	Location of the Project Site	4
Figure 1.2	Project Site	5
Figure 3.1	Relevant heritage listings	10
Figure 3.2	Overview of the Listing Curtilage of the 'Government Railway'	11
Figure 4.1	1861 Plan of the Town of Maitland (East)	13
Figure 4.2	1882 photograph of the 'Smith and Dawson East Maitland brickyard'	14
Figure 4.3	1900 Maitland District Mining Map	15
Figure 4.4	1902 Map of the Town of East Maitland and Suburban Lands	15
Figure 4.5	1912 Parish Map of Maitland	16
Figure 4.6	The western precinct of the brickworks in 1930	18
Figure 4.7	1939 view of the western precinct, facing south (rail line visible at bottom of frame)	19
Figure 4.8	1939 view of the western and eastern precincts, facing south (rail line is visible at bottom of frame)	20
Figure 4.9	Pre 1955 photograph of the brickworks	21
Figure 4.10	Detail of survey of the building complexes within Turton's Brickworks	22
Figure 4.11	View facing southwest across the buildings of Turton's Brickworks, 16 April 1973	23

Photos

Photo 6.1	General view of the Project site, facing northwest and showing the existing New Maitland Hospital	31
Photo 6.2	View across the Project site, facing northeast	31
Photo 6.3	View across the Project site, facing east	32
Photo 6.4	View across the Project site, facing north towards the railway line	32
Photo 6.5	View across the Project site, facing west	33
Photo 6.6	View of the new Maitland Hospital in relation to the railway line (indicated by embankment)	33
Photo 6.7	Comparative view looking towards the Project site with the railway line visible (at-grade in this area)	34

Tables

Table 1.1	How this report addresses SEARs requirements	2
Table 10.1	Mitigation Measures	41

1.0 Introduction

This Historical Heritage Assessment (HHA) report (combined Statement of Heritage Impact and Historical Archaeological Assessment) has been prepared by Umwelt on behalf of Health Infrastructure (HI) to assess the potential environmental impacts that could arise from infrastructure works at 51 Metford Rd, Metford NSW 2323 (the site). The Project is seeking approval for a Development Without Consent (REF) application under Part 5 of the EP&A Act.

This report has been prepared to assess the potential impacts of the proposed works on the historical heritage of the site and surrounds. This report accompanies a Review of Environmental Factors (REF) for the construction and operation of a new mental health services building within the Maitland Hospital campus, including:

- Site establishment.
- Site preparation including earthworks.
- Construction of internal roads and addition of at-grade car parks.
- Construction of 2 storey mental health facility.
- 20 Medium Secure Forensic beds; 24 Low Secure Forensic beds; 20 Rehabilitation and Recovery beds (including civil consumers) (64 beds total).
- Inground building services works and utility adjustments, including service diversions.
- Building foundation works.
- Tree removal.
- Associated landscaping.
- Bioretention basin.

Refer to the Review of Environmental Factors prepared by Ethos Urban for a full description of works.

1.1 Site Description

The site is located at the Maitland Hospital Campus on Metford Road, Maitland, approximately 6.4 km from the CBD of Maitland. The Project site is located within the development parcel, legally described as Lot 73 DP 1256781, as identified in **Figure 1.1** (note, this figure includes a 100 km Asset Protection Zone) and **Figure 1.2** below. The site is located to the east of the recently constructed Maitland Hospital.

1.2 Aims

The purpose of this HHA is to assess the potential impacts of the proposed works on the historical heritage of the site and surrounds. This includes both built heritage and the potential historical archaeological resource.

To enable this assessment, the following tasks have been undertaken:

- Searches of the relevant heritage databases (including all statutory and non-statutory listings) to identify and heritage listings or records that apply to the project site or its immediate surrounds.
- A review of the historical context and development of the Project site and surrounds, including an overview of the history of the suburb of Metford more broadly.
- A targeted site inspection to record the current physical context of the Project site, and to gain an understanding of the level of below ground impact that has occurred at the Project site to date.
- An assessment of the historical archaeological potential of the Project site based on the above tasks.
- An assessment of potential impacts to both built heritage and historical archaeology.
- Preparation of appropriate recommendations for further investigation and/or management of built heritage/historical archaeology (if determined to be required).

1.3 Statement of Significance

Based on the identification of potential issues, and an assessment of the nature and extent of the impacts of the proposed development, it is determined that:

- The extent and nature of potential historical heritage and archaeological impacts are low and will not have significant adverse effects on the locality, community and the environment.
- Potential historical heritage and archaeological impacts can be appropriately mitigated or managed to ensure that there is minimal effect on the locality, community.

1.4 REF Deliverable Requirement Reporting

This report has been prepared with reference to the relevant Secretary's Environmental Assessment Requirements (SEARs) for environmental heritage:

- SEAR 20: Where there is potential for direct or indirect impacts on the heritage significance of environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (if potential impacts to archaeological resources are identified), prepared in accordance with the relevant guidelines, which assesses any impacts and outlines measures to ensure they are minimised and mitigated.

Table 1.1 How this report addresses SEARs requirements

SEARs Requirement	Relevant Section of Report
Identification of relevant guidelines	Section 2.0
Assessment of built heritage impacts (Statement of Heritage Impact)	Section 7.0 and 9.0
Assessment of historical archaeological impacts (Archaeological Assessment)	Section 8.0 and 9.0
Conclusions and recommendations (minimisation and mitigation measures)	Section 10.0

1.5 Methodology

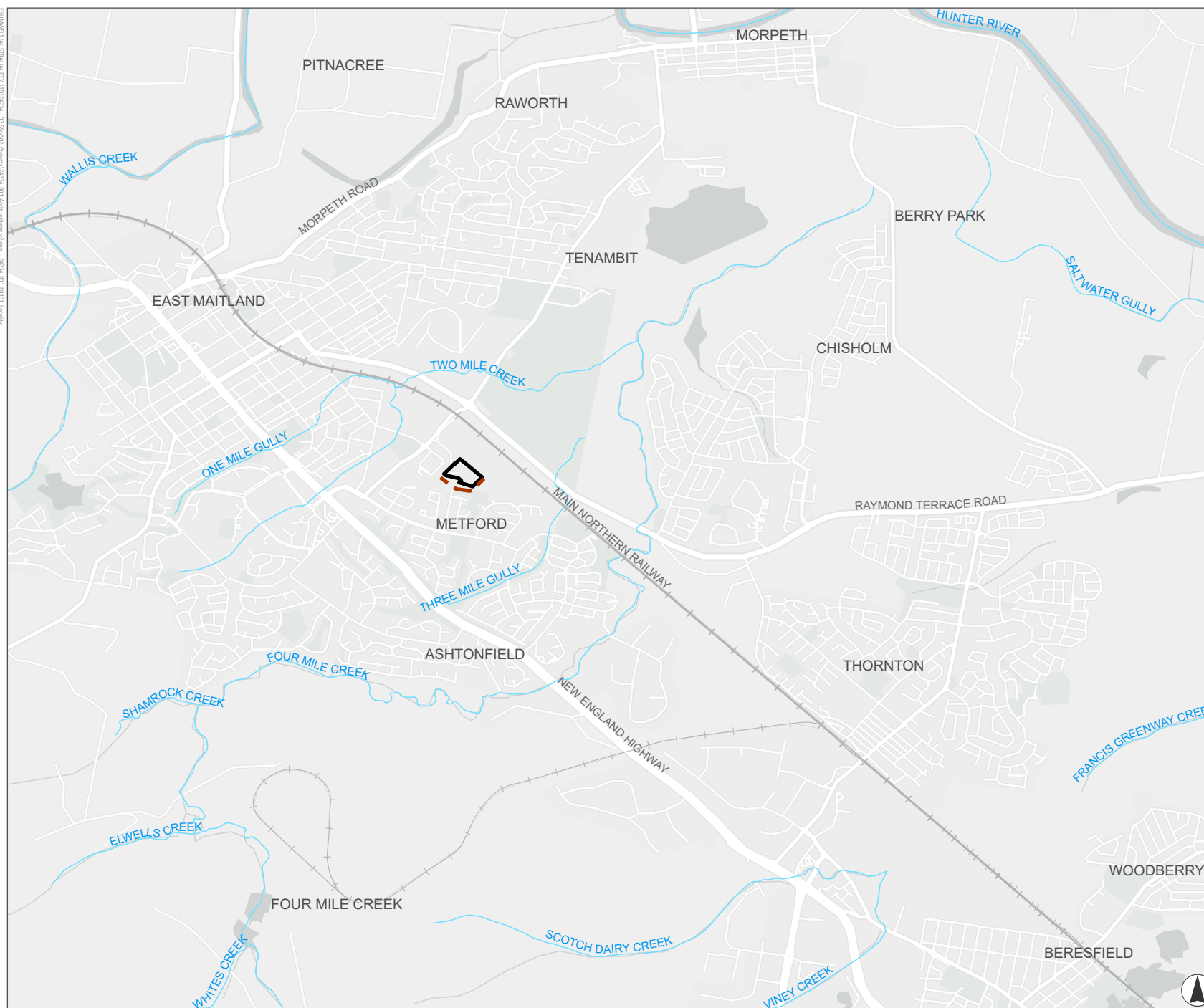
This HHA has been prepared with reference to *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance (Burra Charter)* (2013) and the best practice standards set out by Heritage NSW.

Best practice guidelines that have been considered in the preparation of this report are summarised at **Section 2.3**.





1.6 Authorship

This report was written by Karyn Cook, Principal Heritage Consultant of Umwelt. It has been reviewed by Tim Adams, Principal Heritage Consultant and Heritage Manager, NSW/ACT, also of Umwelt.

FIGURE 1.1
Location of the Project Site



Legend

-  Project Site
-  Asset Protection Zone
-  Watercourse
-  Railway

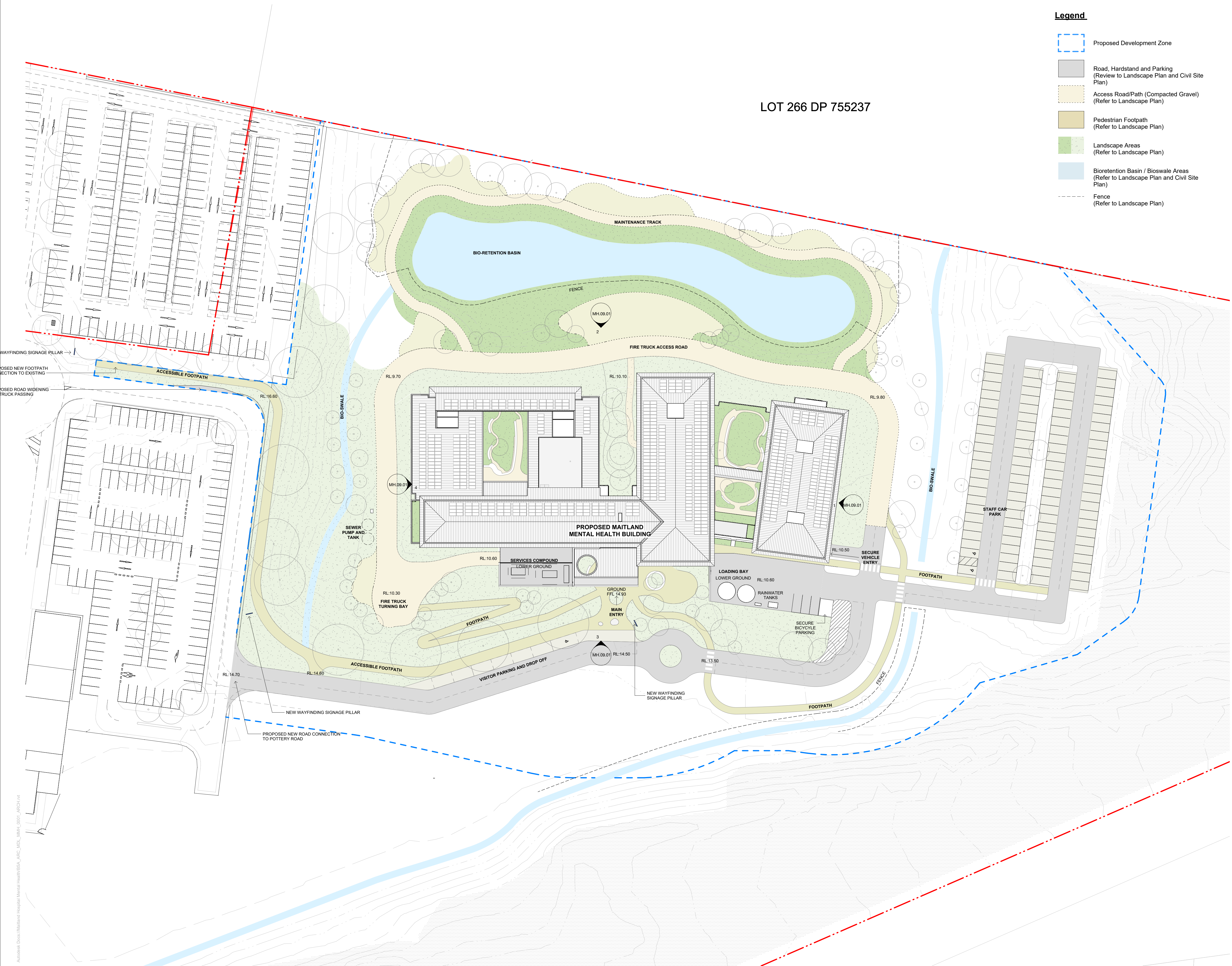


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Legend

- Proposed Development Zone
- Road, Hardstand and Parking
(Review to Landscape Plan and Civil Site Plan)
- Access Road/Path (Compacted Gravel)
(Refer to Landscape Plan)
- Pedestrian Footpath
(Refer to Landscape Plan)
- Landscape Areas
(Refer to Landscape Plan)
- Bioretention Basin / Bioswale Areas
(Refer to Landscape Plan and Civil Site Plan)
- Fence
(Refer to Landscape Plan)

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Health
Hunter New England
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Health
Infrastructure

Current Revision Description

Data Issue Record
Current Revision released byMDT

Rev	Date	Description
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07	13.12.24	REF Application
06	24.10.10	Issued for Review
05	24.09.26	Issued for Review
04	24.09.24	Issued for Review
03	24.08.30	Issued for Review
02	24.08.26	Issued for Review
01	24.08.02	Issued for Review

Project Title
**SWMHIP - New Maitland Hospital
Mental Health**

First Nations Country
Wonnarua

Project Address
Metford Rd, Metford NSW 2323

Project No.
S12598

Drawing Title
**Site
Proposed Site Plan**

Phase
Design Development

Status
**NOT FOR
CONSTRUCTION**
Drawing no.

MH.01.03

Scale
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Revision
07



2.0 Statutory and Assessment Context

The following section provides an overview of the legislative framework relating to the protection and management of historical (non-Aboriginal) heritage in NSW. The management and conservation of historical heritage items, relics, archaeological sites and places is subject to a range of statutory provisions. The relevant statutory and non-statutory heritage listings are discussed and any items affected by these provisions within the Project site are identified.

Also provided is an overview of the relevant guidelines/policies that guide historical heritage assessments in NSW and which have been considered in the preparation of this report.

2.1 The Heritage Act 1977 (NSW)

The *Heritage Act 1977* (Heritage Act) is administered by Heritage NSW. The purpose of the Heritage Act is to ensure cultural heritage in NSW is adequately identified and observed. The Heritage Act is the primary item of state legislation affording protection to items of environmental heritage (natural and cultural) in NSW.

Under the Heritage Act ‘items of environmental heritage’ include places, buildings, works, relics, moveable objects, and precincts identified as significant based on historical, scientific, cultural, social, archaeological, architectural, natural, or aesthetic values. State significant items are listed on the NSW State Heritage Register (SHR) and are given automatic protection against any activities that may damage an item or place or affect its heritage and/or archaeological significance.

The Heritage Council of NSW, appointed by the Minister, is responsible for heritage in NSW, as constituted under the Heritage Act. The Council is a cross-section of heritage experts, with Heritage NSW being the operational arm of the Council.

There are no State listed heritage items located in or within 1 km of the Project site.

2.1.1 Relics Provision of the Heritage Act 1977

The Heritage Act affords automatic statutory protection to ‘relics’ which form part of archaeological deposits (except where these provisions are suspended by other prevailing legislation). The Heritage Act defines a ‘relic’ as any deposit, object, or material evidence that:

- Relates to the settlement of the area that comprises NSW, not being Aboriginal settlement.
- Is of state or local heritage significance.

Sections 139–145 of the Heritage Act prevent the excavation or disturbance of land known or likely to contain relics, unless in accordance with an excavation permit. Section 60 excavation permits are required to disturb relics within SHR items/places, while Section 140 permits are required for items/places that are not listed on the SHR (as is the case for the Project site).

The Project site has not previously been identified as an archaeological site or an area of archaeological potential.

2.2 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) requires that consideration be given to environmental impacts – including heritage – as part of the land use planning process, and the provisions of the EP&A Act allow for the implementation of Local Environmental Plans (LEPs).

Part 5 Clause 5.10 of the Maitland LEP 2011 provides the statutory framework for heritage conservation including the conservation of:

- The environmental heritage of Maitland.
- Heritage significance of heritage items and heritage conservation areas.
- Archaeological sites.
- Aboriginal objects and Aboriginal places of heritage significance.
- There are no locally listed heritage items located within the project site. The closest locally listed heritage item is located approximately 240 metres to the north of the project site (refer to **Section 2.0**).

2.3 Relevant Guidelines/Policies

2.3.1 The Burra Charter: The Australian ICOMOS Charter for Places of Cultural Significance (2013)

The *Burra Charter* is a set of best practice principles and procedures for heritage investigation and conservation. The Charter was developed by the Australian group of the international professional organisation for conservation; International Council for Monuments and Sites (ICOMOS).

Although it is not a statutory document, the *Burra Charter* provides a best practice standard for heritage management in NSW and Australia. The policies and legislative guidelines of the Heritage Council of NSW and the Heritage Division are consistent with and guided by the *Burra Charter*.

2.3.2 NSW Heritage Manual

The *NSW Heritage Manual* (Heritage Office and Department of Urban Affairs and Planning 1996) provides a series of guidelines for undertaking heritage value identification, significance assessment, and management. The guidelines respond to the three steps of the NSW heritage management system, which are focused on the investigation of significance, assessment of significance, and appropriate management of significance.

2.3.3 Assessing Heritage Significance Guidelines

The *Assessing Heritage Significance Guidelines* (NSW Department of Planning and Environment 2023) outline how to assess heritage significance against the criteria developed in 1999 by the Heritage Council of NSW. They are intended to assist in:

- Assessing the heritage significance of a place or object in NSW (for example as part of a heritage listing process, or as part of new or changing management of a place or object).

- Managing, caring for or advising on heritage listed places and objects by parties such as owners, heritage professionals, managers and custodians.

2.3.4 Preparing a Statement of Heritage Impact (SoHI)

The *Guidelines for preparing a Statement of Heritage Impact* (NSW Department of Planning and Environment 2023) explains how to prepare an effective and fit-for-purpose statement of heritage impact (SoHI). These guidelines replace the *Statements of heritage impact* (Heritage Office and Department of Urban Affairs & Planning 1996, revised 2002).

The guidelines apply to SoHIs (also referred to as Heritage Impact Statements, Heritage Impact Assessments or Historical Heritage Assessments) prepared for works (works can be activities and/or change) to:

- Items on the SHR listed under the (*Heritage Act*).
- Items listed in Schedule 5 of LEPs prepared by local governments.
- Items included in heritage and conservation registers prepared under section 170 of the (*Heritage Act*).
- Non-statutory heritage lists.
- Works in the vicinity of heritage items.

2.3.5 Archaeological Assessment Guidelines

The *Archaeological Assessment Guidelines* (Department of Urban Affairs and Planning 1996) provides a detailed processes for undertaking archaeological assessments and managing archaeological resources in NSW. An archaeological assessment should include:

- Thorough background research to identify themes and environmental conditions to determine the likelihood of archaeological remains being present.
- Assessment of the significance or likely significance of archaeological remains.
- Research questions to guide the investigation of any archaeological remains.
- Appropriate management procedures.

2.3.6 Assessing Significance for Historical Archaeological Sites and ‘Relics’

The *Assessing Significance for Historical Archaeological Sites and ‘Relics’* (NSW Heritage Branch, Department of Planning 2009) considers a broader approach to archaeological significance rather than a focus on the research potential of an archaeological site only. It advocates for archaeological research to contribute to the knowledge of the past in a meaningful way, rather than duplicating information that is known or could be gained from other archaeological remains, documentary records, or oral history.

3.0 Relevant Heritage Listings

As part of the historical heritage assessment of the proposed works area, a review of relevant heritage databases was undertaken including:

- The Maitland (LEP) 2011.
- The State Heritage Inventory (SHI) (including the s170 registers).
- NSW State Heritage Register (SHR).
- Australian Heritage Database (including Commonwealth and National Heritage lists).

This review has shown that no listed heritage items are located in or within the immediate vicinity of the Project site. The closest listed heritage item to the project site is identified in Schedule 5 of the Maitland LEP 2011 as 'Government Railway' (Item ID I119). This heritage item is located approximately 240 km to the north of the project site. Further information regarding the 'Government Railway' heritage listing is provided at **Section 3.1**.

All other heritage items are located more than one kilometre from the project site, and do not have any discernible physical or visual relationship with the Project site.

Heritage listings are shown in relation to the Project site in **Figure 3.1**.

3.1 'Government Railway' – Locally Listed Heritage Item

The State Heritage Inventory (SHI) listing citation for this heritage item contains limited information regarding its physical description, heritage significance and historical context.

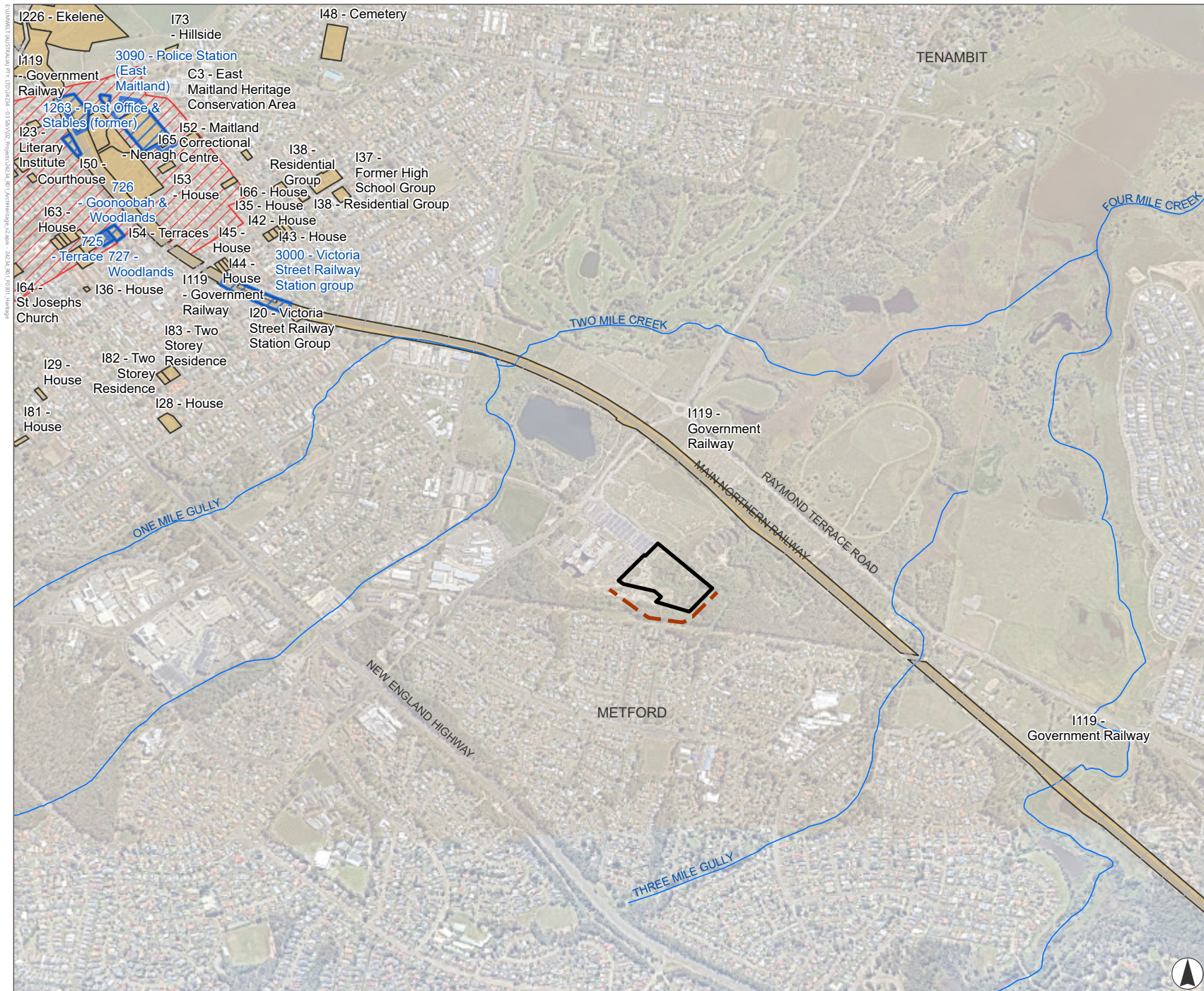
Physical Description

The SHI citation for the item describes it as a two-track railway, generally located on embankments and elevated structures. The description notes stations are present at Central Maitland and East Maitland (closed) along with ancillary buildings.

Heritage Significance

The SHI citation for the item notes that it has historical, aesthetic and scientific (research) significance, as well as representative, landmark and integrity values. It provides no further information regarding the item's significance.

FIGURE 3.1
Relevant Heritage Listings



- Legend**
- Project Site
 - Asset Protection Zone
 - Watercourse
 - Railway
 - State Listed Heritage**
 - Item - State Heritage Act
 - Locally Listed Heritage**
 - Conservation Area - General
 - Item - General



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Metres

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Historical Context

The historical context for the item provided in the SHI citation for the item is brief, stating:

Public meeting in Sydney 1853 formed Hunter River Railway Co. Built to East Maitland 1857, to West Maitland 1858. 1864 extended to Singleton.

The overall curtilage of this heritage listing is extensive, extending across multiple suburbs as shown in **Figure 3.2**. It is noted that the portion of the listed item that is located in proximity to the Project site represents a minor and localised portion of the overall heritage listing that applies to the 'Government Railway', the curtilage of which is extensive and is intended to encompass the extent of the railway.

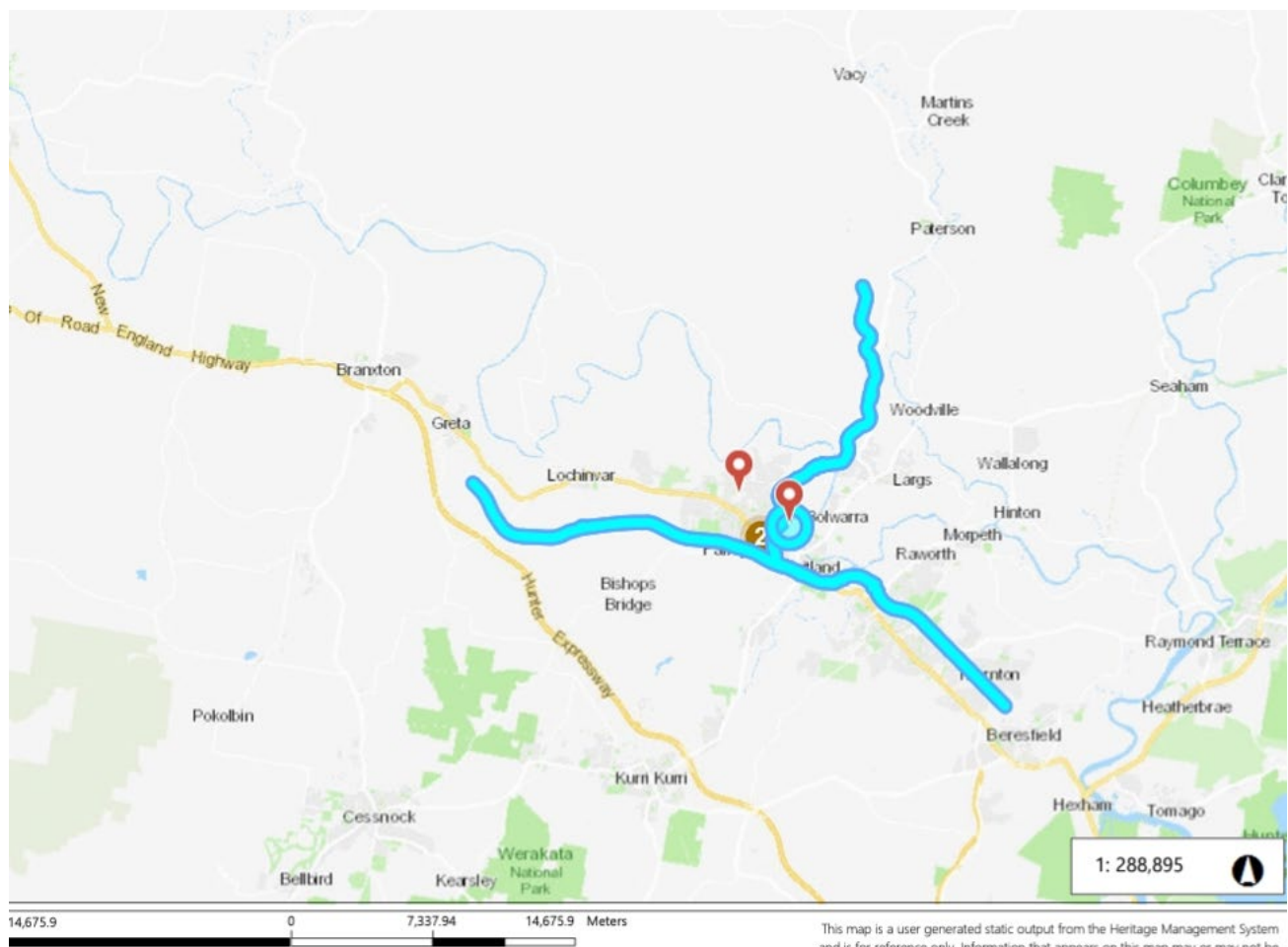


Figure 3.2 Overview of the Listing Curtilage of the 'Government Railway'

Source: https://www.hms.heritage.nsw.gov.au/App/Item/SearchHeritageItems?_ga=2.165972984.714120821.1658117920-344545924.1656901875

4.0 Historical Context

4.1 A Brief History of Maitland

Thematic studies of the history of the Maitland district have noted that it is likely that the Maitland area was ‘discovered’ well before any ‘official settlement’ of the area (Thorp 1994: 9). The historical record shows that during the later 1790s, several convict escapees from established settlements in Sydney and Parramatta made their way north to the Hunter River, and reported on the fine timber stands they observed in this area. Such reports, particularly regarding preferred species such as cedar, encouraged timber-getters to travel to the area prior to the first official survey in 1801.

This official survey was directed by Governor King and undertaken by Lieutenant-Colonel Paterson, with the intention of assessing the area’s potential as a source of supplies and resources for the colony. A subsequent survey several months later confirmed the findings of the first survey party; that the area was suitable for agricultural settlement and timber-getting. In the following years several parties of explorers and surveyors would also investigate the area. In 1822 Henry Dangar undertook a systematic survey of the area, including settlement areas and individual land holdings (Thorp 1994: 9).

In 1804, a permanent settlement was made at Newcastle to facilitate the systematic exploitation of the area’s natural resources, and the area encompassing Maitland was also governed by the Commandant of the Newcastle settlement. The extensive use of convict labour in the area up until the 1820s led to the establishment of a permanent military settlement in Maitland, as well as the establishment of several major convict stockades in both East and West Maitland (Thorp 1994: 13).

4.1.1 Initial Settlement

The earliest settlers to the wider district were minor officials from Newcastle, who were each granted 34 acres of land in the area from Pitnacree to Maitland. These initial land grants were predominately used as orchards. From 1819 onwards, the area was ‘thrown open’ for settlement by Governor Macquarie, and by 1826 a mixture of both free and convict settlers had settled in the area.

In 1821, Commissioner Bigge instigated a policy whereby land was granted to the wealthy in proportion to the amount of their capital on the condition that they employ one convict for every ten acres of land; this policy established in the area a pattern of land settlement characterised by large estates owned by military personnel and prominent citizens. As a result of this, many of the districts of Maitland are founded on or within subdivisions of these larger, established estates. From the 1880s onwards, these estates were progressively broken up into smaller subdivisions and lots, the size of which made them attractive for smaller-scale farmers and residential development of a higher density (Thorp 1994: 17).

As the agricultural prosperity of the district increased, several smaller outlying towns came into being. Industrial development was also influential in the formation of towns in the later years of the nineteenth century. This led to a district that was and continues to be characterised by a ‘patchwork of towns and villages’, the locations and ages of which are reflective of important topographical features (for example fertile flats, natural corridors of movement, mining or resource potential, etc) as well as the temporal development of the area as influenced by the evolving economic context (refer to **Figure 4.1**, overleaf).

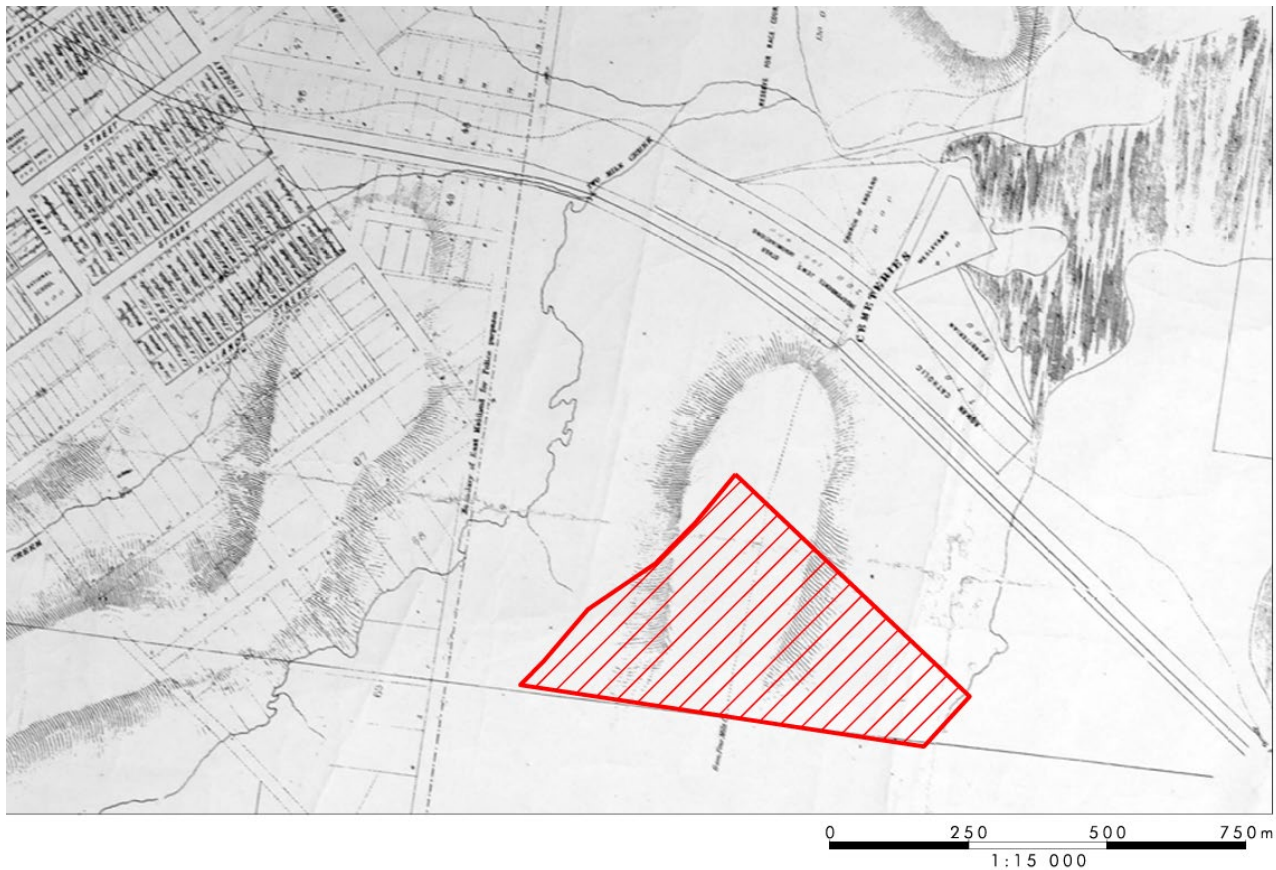


Figure 4.1 1861 Plan of the Town of Maitland (East)

Entirety of Lot 73 DP 1256781 (approximate) indicated by red hatching

Source: Maitland Council (1861)

4.1.2 Brickmaking in East Maitland

As touched on above, industrial development in the Maitland district was influential in the formation of smaller towns in the mid to late nineteenth century. Brickmaking specifically is an industry with a long history in Maitland; potentially commencing as early the mid-1850s.

Along with his sons, John Baker, who immigrated to Australia in 1852, commenced manufacturing bricks in East Maitland in approximately 1857. Their company, 'F Baker and Sons Pty Ltd', has been credited as the first in the district to sell bricks from stock. The firm established their first brickyard in Metford in 1907 (which operated until 1973), and also controlled plants in Bowral, Parkes and Wingham-Taree.

Prior to 1870 and within the Metford area, a small yard specialising in hand-moulded bricks was operated by Messrs Smith and Dawson. This yard, being just five acres in size, was located in the bush close to Newcastle Road; the original yard was located on the western side of Metford Road, and outside of the current project site.

English brick maker Robert Turton arrived in Newcastle in 1851, where he opened one of the earliest recorded brickworks in the area, 'Turton and Sons', managed in part by his son Frank. In 1882 Frank opted to establish his own brickworks, and subsequently purchased the five-acre yard from Messrs Smith and Dawson for the sum of £178 (refer to **Figure 4.2**).

Frank Turton was the first to introduce the use of modern machinery to the East Maitland area, having made bricks by the extrusion method (Maitland City Council Library).

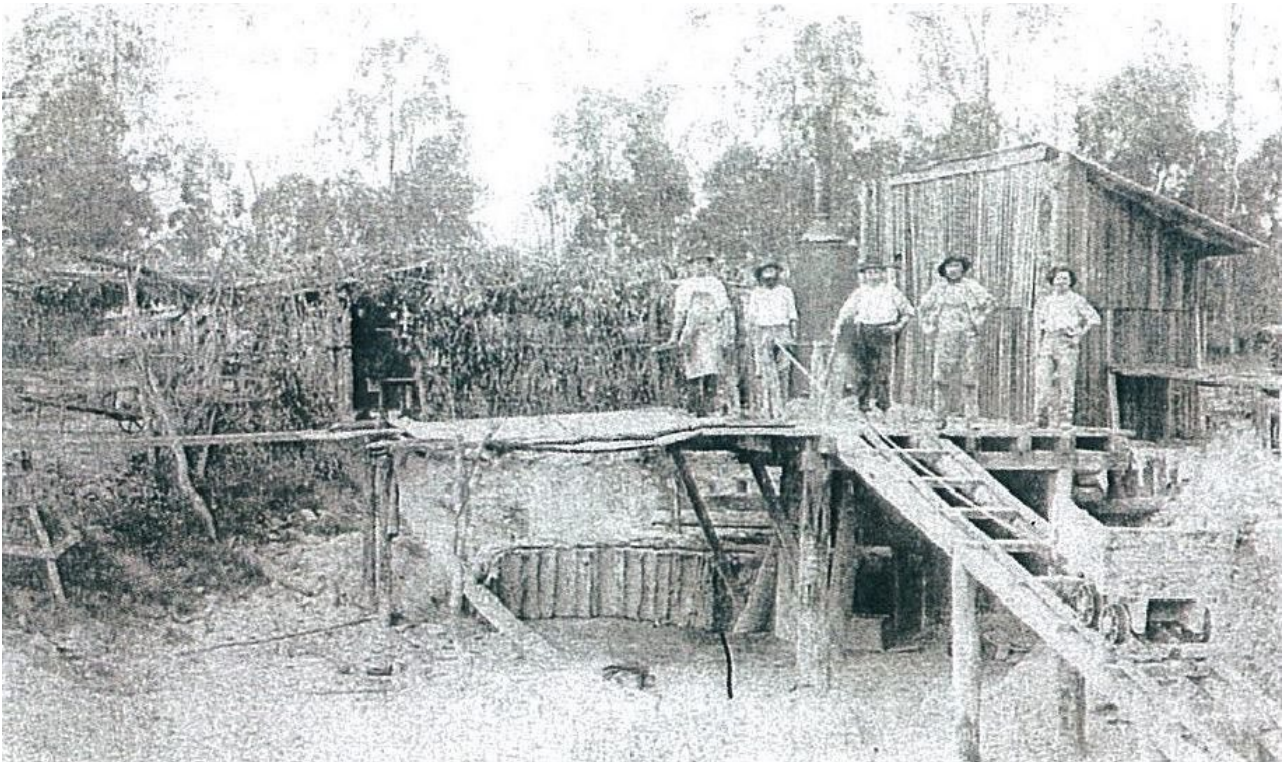


Figure 4.2 1882 photograph of the ‘Smith and Dawson East Maitland brickyard’

The photograph was taken at the time of the Turton purchase

Source: McDonald 2010: p. 27, photograph courtesy of Maurine [Turton] Osborn

Over time, Turton’s East Maitland (Metford) brickworks expanded and a number of additional buildings were constructed within the original yard on the western side of Metford Road. By approximately 1939 the original brickworks had been extended to the eastern side of Metford Road and within/immediately adjacent to the current Project site. This is described in further detail at **Section 4.2** below.

4.1.3 The Suburb of Metford

Metford was nominated as an official suburb until 1969. Up until that time, the now suburb of Metford comprised:

‘... an officially unnamed area adjoining the south-eastern boundary of East Maitland, bounded on the southwest by the New England Highway, on the southeast by Four Mile Creek, on the northeast by the Main Northern Railway Line and on the northwest by Metford Road.’ (Government Gazette of the State of NSW, 11 April 1969).

4.2 The Project Site and the Turton Brickworks

The current project site originally formed part of a wider parcel of land that was vested in the Municipal Council of East Maitland for the purposes of public use, including common and recreation uses, interment of the dead, etc (refer to **Figure 4.3** and **Figure 4.4**).

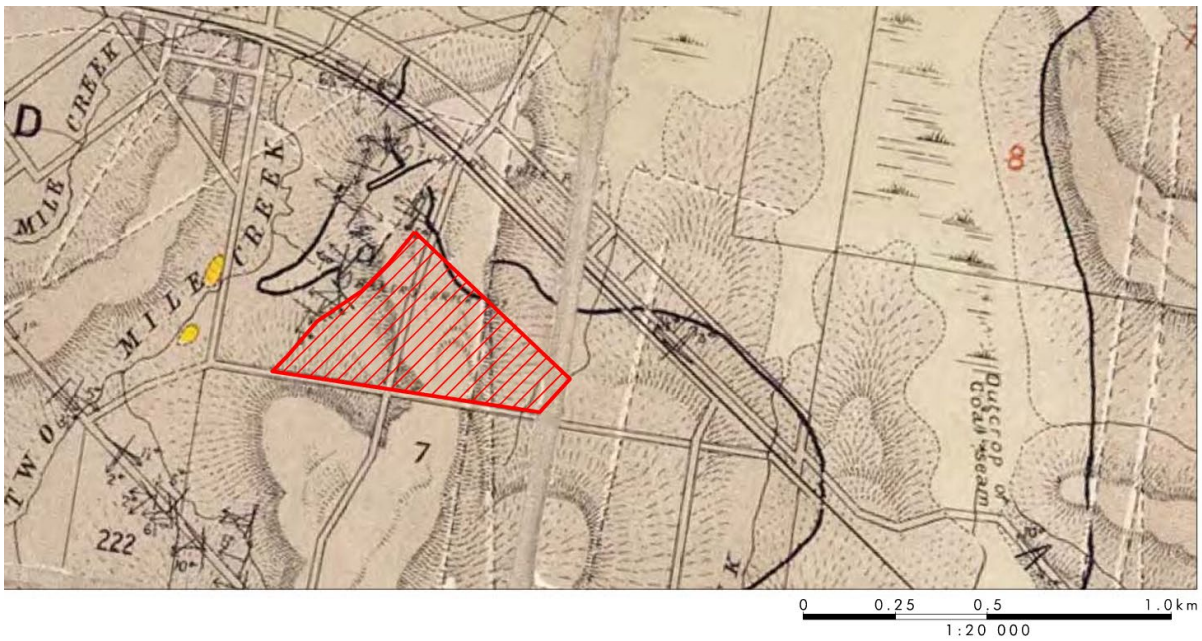


Figure 4.3 1900 Maitland District Mining Map
Entirety of Lot 73 DP 1256781 (approximate) indicated by red hatching

Source: Maitland Council (1861)

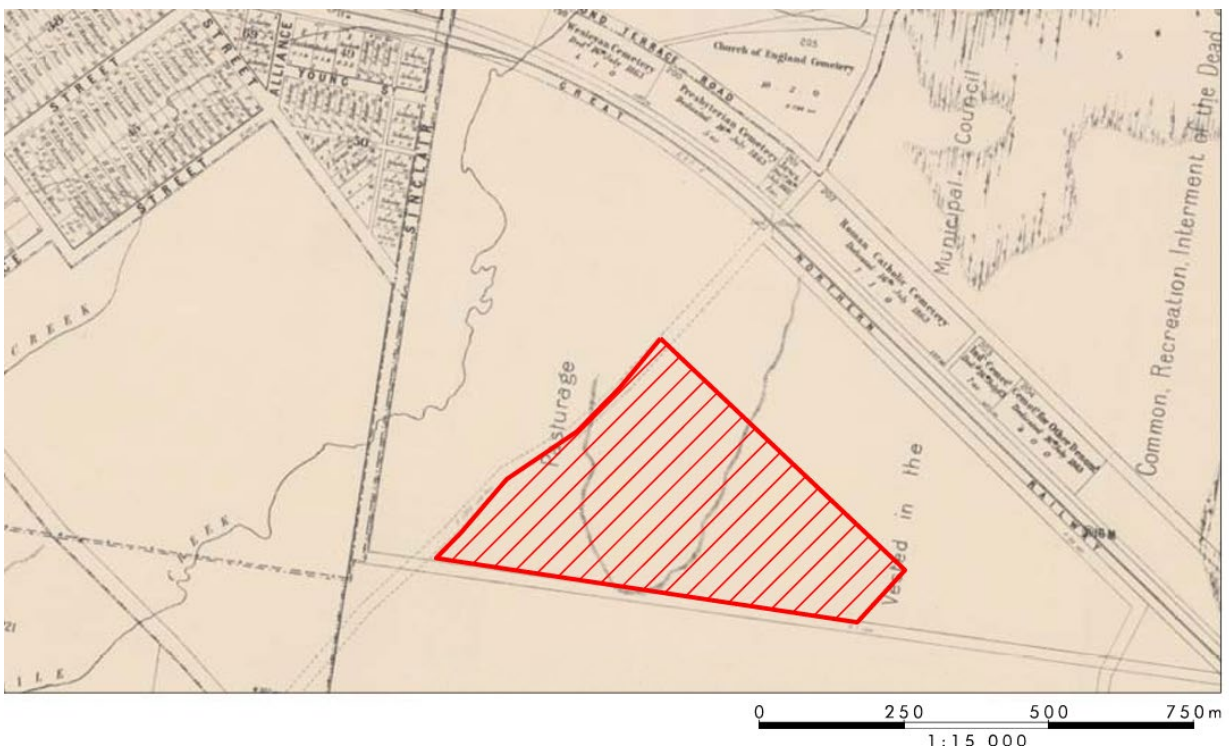


Figure 4.4 1902 Map of the Town of East Maitland and Suburban Lands
Entirety of Lot 73 DP 1256781 (approximate) indicated by red hatching

Source: National Library of Australia (1902)

As noted above, a brickworks was established outside and to the west of the current Project site and on the western side of Metford Road some time prior to the 1870s (refer to **Figure 4.5**).

This is herein referred to as the ‘western precinct’ of the brickworks. The brickworks were later become known as the ‘Turton Brickworks’ under the ownership of Frank Turton.

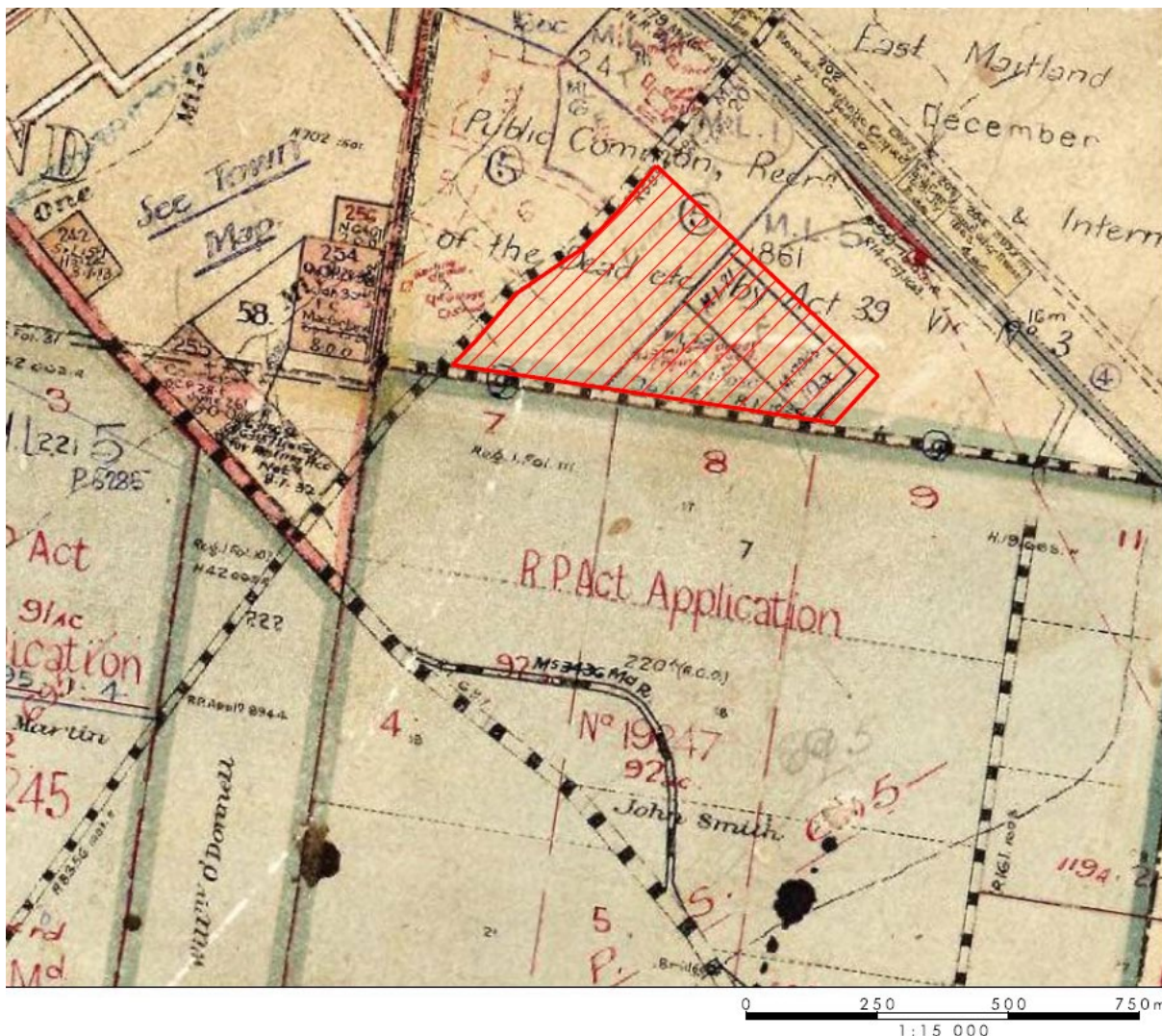


Figure 4.5 1912 Parish Map of Maitland

Entirety of Lot 73 DP 1256781 (approximate) indicated by red hatching

Source: LPI (1912)

The original brickworks (western precinct) were subsequently expanded to the eastern side of Metford Road, with a main building complex established to the northwest and outside of the current Project site (herein referred to as the ‘eastern precinct’ of the brickworks). The eastern precinct building complex was located to the northwest of the current Project site, and did not extend physically into the current Project site.

Although the current Project site formed part of the overall brickworks site, there is no evidence in the historical record to suggest that any buildings or structures associated with this use were ever constructed within the Project site.

Rather, it appears that the area to the south of the main building complex (i.e. the Project site) was used primarily for the purposes of quarrying and vehicle movement, or was otherwise maintained as undeveloped land.

The historical development of the overall brickworks is described in greater detail below. The detailed descriptions of each of the brickwork precincts are based on historical mapping and photographs, and have been sourced from the 2003 heritage assessment undertaken by HLA-Envirosciences.

4.2.1 The Western Precinct: 1882 Onwards

A newspaper article dated 1912 details the extent to which the brickworks on the western side of Metford Road (the 'western precinct') had been substantially developed by that time:

- A total of 11 hectares of land, including a dam.
- A large dry-press plant, only recently installed.
- Kilns within 50 or 60 yards of the rail line to the north.
- A clay pit, by this time worked down to rock at 25 to 30 feet.
- Lancashire boiler with two furnaces, being 26 by 7.5 feet in size.
- Principal machine building, being 50 by 54 feet in size, with an adjoining office, being 18 by 12 feet in size.

The earliest available mapping of the physical configuration of the western precinct is in the form of charting notes made on the Parish of Maitland Plan 1912; this Parish Map was in use from 1912 to 1934, meaning that the charting notes regarding the physical configuration of the brickworks may have been added at any time within this period. Based on a review of these annotations against the written description available in the 1912 newspaper article, it is considered that the annotations are not particularly detailed or accurate.

Photographic evidence of the western precinct that date from the 1930s onwards also provide a record of structures formerly present there, and demonstrates the extent to which operations had been expanded by this time. The earliest such photo, dated from 1932, faces south from the railway line and shows the following configuration (refer to **Figure 4.6**):

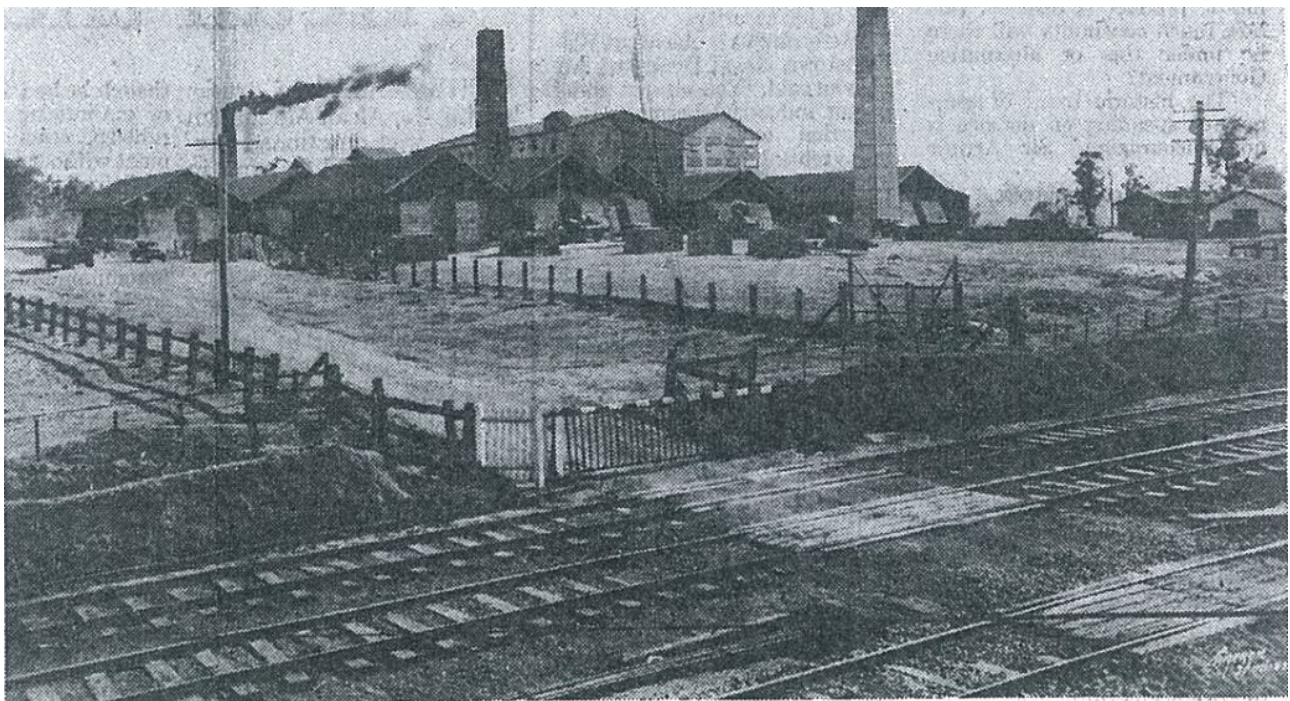
- Three low buildings on the western side of the western precinct and north of the clay pit.
- Two rows of kilns:
 - The row closest to the railway line contained seven kilns with a chimney in front of the second kiln closest to the pit.
 - Four kilns in the second row with a chimney in front of the fourth kiln west from Metford Road.
 - The kilns are of a simple down-draft type typical of for the time. The kilns would have been linked to the chimneys by underground flue systems.

- Next to the fourth kiln in the second row and closest to the clay pit were two multi-storied buildings with a series of windows on each level. These buildings may have potentially been some form of drying buildings.
- Behind the second row of kilns are a number of buildings. At least one appears to have been multi-storied. A third chimney is located within this building cluster. These buildings appear to have housed the clay preparation plant and presses for bricks and tiles.

By 1939 (**Figure 4.7**), the photographic record suggests that only two main changes had been undertaken within the western precinct; a single storey brick structure with a tiled roof had been constructed in the north-east corner of the site, which was used as brickworks office. The second change was the construction of five additional low-lying buildings in proximity to the three low buildings located to the west of the site and north of the clay pit.

Behind these five buildings was a double-roofed structure with two chimneys that were smaller than the three chimneys visible in the 1932 photograph. To the south of the southernmost chimney, a new multi-storied structure had also been erected.

There is no evidence in the historical record to suggest that any structures or built elements associated with the brickworks had been established on the eastern side of Metford Road prior to the 1930s, with all development limited to the western precinct.



Maitland brickworks as they looked in 1930.

Figure 4.6 The western precinct of the brickworks in 1930

The Project site is to the left of frame, and is not visible in this photograph. Metford Road crosses the rail line in the foreground.

Source: *Newcastle Morning Herald*, 11 May 1981

4.2.2 The Eastern Precinct: c. 1930s

A second photo, also dated 1939 (**Figure 4.8**), provides information regarding the physical configuration of the expansion of the brickworks onto the eastern side of Metford Road, in what is herein referred to as the 'eastern precinct'. The date of this photograph establishes that the eastern expansion of the brickworks was undertaken during the 1930s, with construction works ongoing as late as 1939.

The brick press buildings are visible as completed structures in this photograph. Two rows of downdraft kilns and an associated chimney are shown as being in construction, and these kiln rows are located in alignment with the two rows of kilns on the western site. Also visible is a residence fronting Metford Road, as well as a clay hole.



Figure 4.7 1939 view of the western precinct, facing south (rail line visible at bottom of frame)

Source: HLA Envirosciences, 2003



Figure 4.8 1939 view of the western and eastern precincts, facing south (rail line is visible at bottom of frame) *Source: HLA Envirosiences, 2003*

There is no evidence to suggest that any structures or built elements associated with the brickworks were located within the current Project site as part of this phase of development; all documented buildings or structures were located to the northwest of the current Project site, and within the main building complex.

4.2.3 The Consolidated Brickworks: c. 1940s Onwards

In November 1940 a description of the overall brickworks was published; the site was described as operating 15 kilns of the downdraft type to produce a daily output of 25,000 bricks and tiles, with the entire works said to cover an area of 11 acres (Newcastle Morning Herald and Miner's Advocate, 16 November 1940: 12). Also described was a drying room capable of holding 90,000 tiles, as well as the general methodology employed by the works at that time. In 1947 the company secured approval to construct six new kilns at a cost of £9,000, with substantial growth anticipated at the works over the following years (Newcastle Morning Herald and Miner's Advocate, 14 November 1947: 2).

By the 1960s the site was producing, per year, approximately 10 million bricks, 2.5 million terra cotta roofing tiles, and 250 t worth of terra cotta flowerpots. At the height of production, the brickworks comprised 12 intermittent downdraft kilns, each capable of holding approximately 140,000 bricks, and seven intermittent downdraft tile and pottery kilns, each capable of holding approximately 25,000 roofing tiles. **Figure 4.9**, below, shows the configuration of the brickworks some time prior to 1955.

Photographic evidence dating from 1958 shows that by this time three distinct areas of buildings had been established within the eastern precinct. The first is the brick press building, located adjacent to the clay hole, with the other two building areas having comprised two sets of three downdraft kilns.

The general layout of buildings shown in the 1958 photograph is consistent with the layout shown in a 1962 survey plan of the site (refer to **Figure 4.10**).

Again, there is no evidence to suggest that any structures or built elements had been introduced to the current Project site by this time.

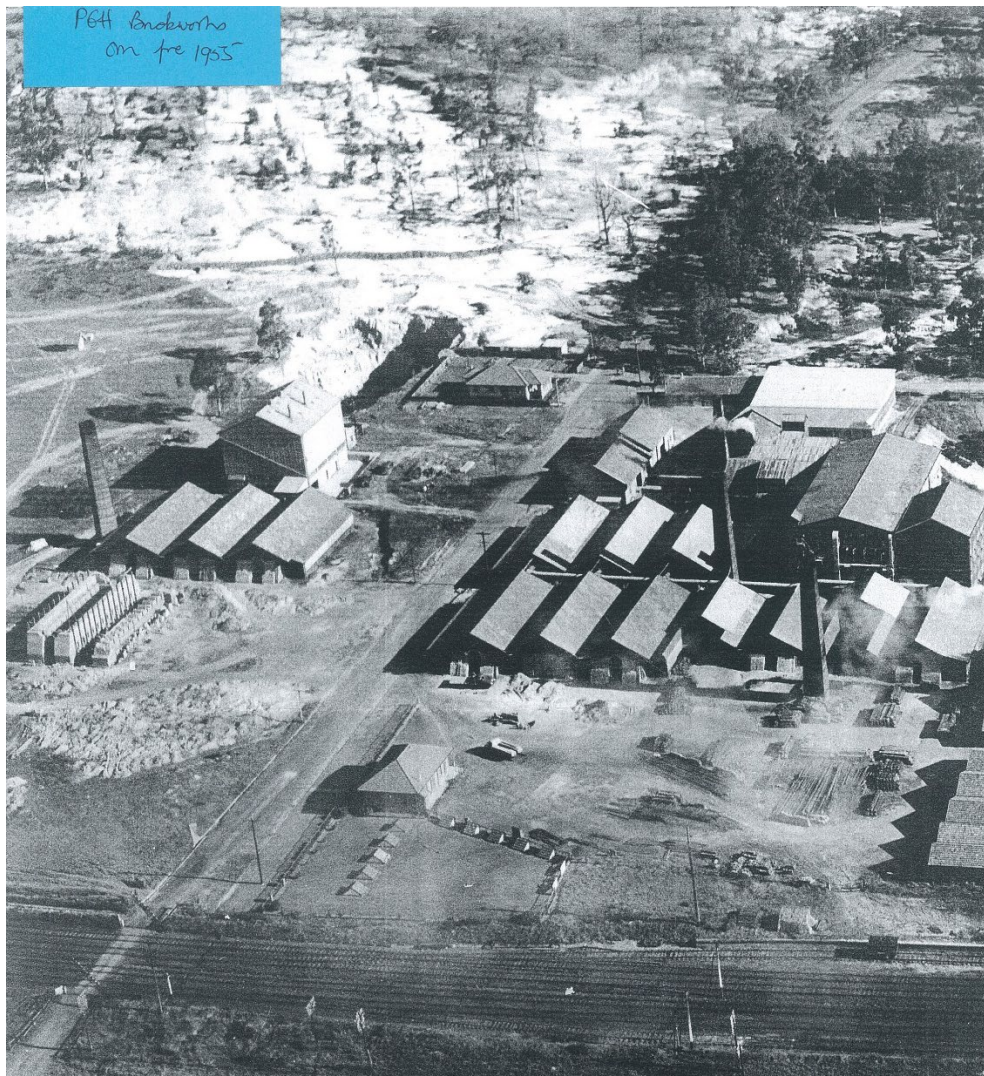


Figure 4.9 Pre 1955 photograph of the brickworks

The vacant area to the south of the main building complex of the eastern precinct, which forms the current Project site, is visible at the top/top left of frame.

Source: Maitland City Council, Local Studies

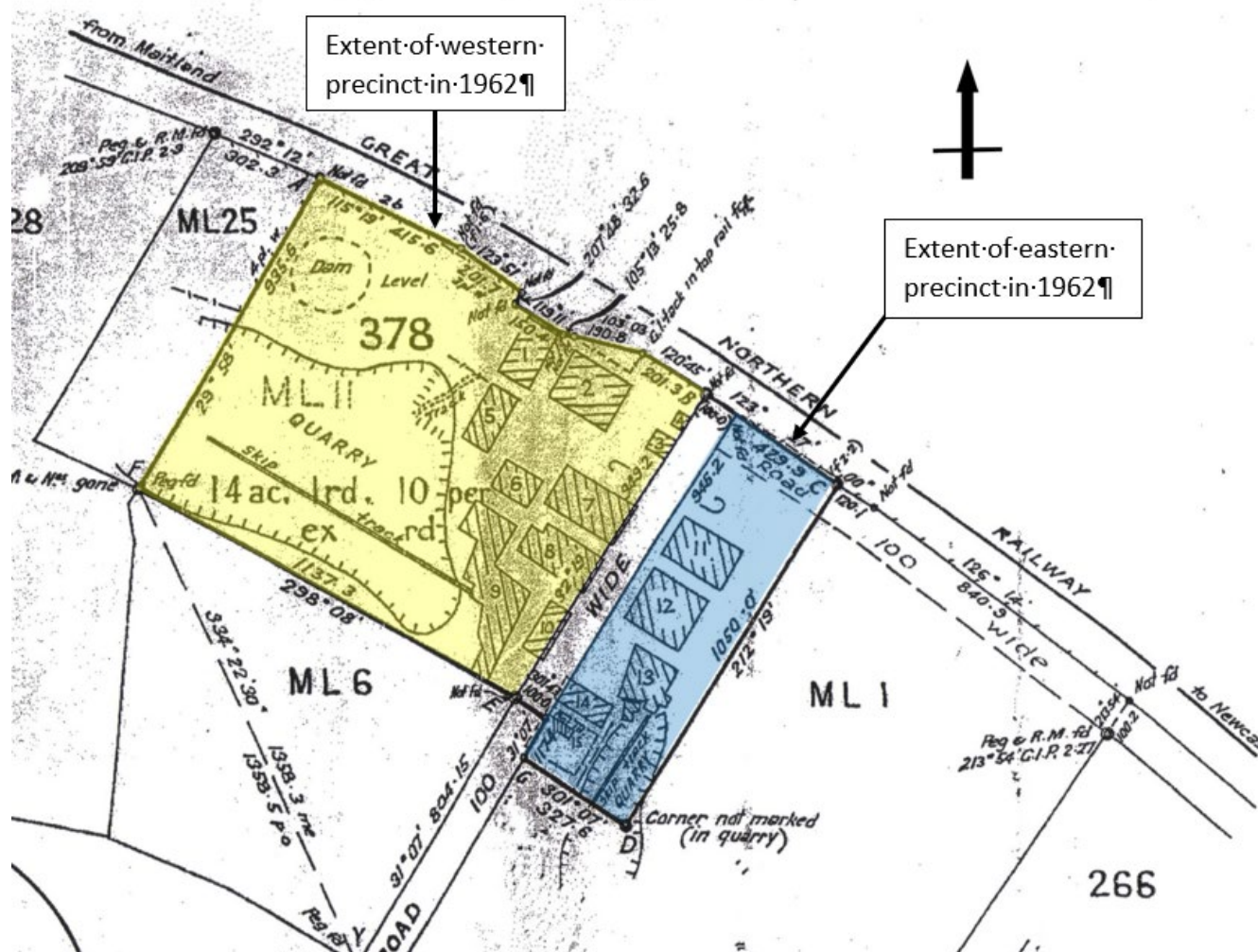


Figure 4.10 Detail of survey of the building complexes within Turton's Brickworks

Survey is dated 13 November 1962. The current Project site is located to the southeast and is not represented in this survey.

Source: PGH Digital Records, 13 November 1962

4.2.4 PGH Industries: 1969 Onwards

The Turton Brickworks were purchased by PGH Industries in 1969. PGH Industries was established in the mid-1920s when Maxwell Porter, a roof tile manufacturer, and David Galbraith established a terra cotta roof tile plant in Sydney. The public company of Porter and Galbraith was then formed in 1949, and in 1965 (a few years prior to purchasing the Turton Brickworks) the company merged with Hanson Consolidated to become PGH Industries. Examples of buildings constructed from sandstock bricks manufactured by PGH include the Maitland Water Works, Bolwarra Public School, West Maitland Court House and Morpeth Catholic Church.

In 1972 PGH announced that a new brick and tile plant was to be constructed within and adjacent to the established eastern precinct, which would involve the substantial redevelopment of the existing buildings within this precinct in the following years. A large oil-fired kiln, which was to be opened by the then Premier of NSW in March 1974, was constructed to replace existing coal-fired kilns; this new larger building is visible in a 1973 aerial photograph (refer to **Figure 4.11**).

Around this time, the brick press building within the eastern precinct had been extended to the east, and the clay hole was no longer in use with clay now being brought to the site by truck.

The three northern kilns in the eastern precinct were demolished in the early 1980s to make way for a continuous chamber kiln known as the 'Hoffman Kiln', which was installed in approximately 1984. The remaining kilns on the eastern portion of the site had been removed by 1993 and replaced by a drying building. The Hoffman Kiln had also been demolished by 1993.

The entire plant on the western side of Metford Road was demolished progressively from approximately 1976 onwards. Again, none of the buildings were constructed within the current Project site.

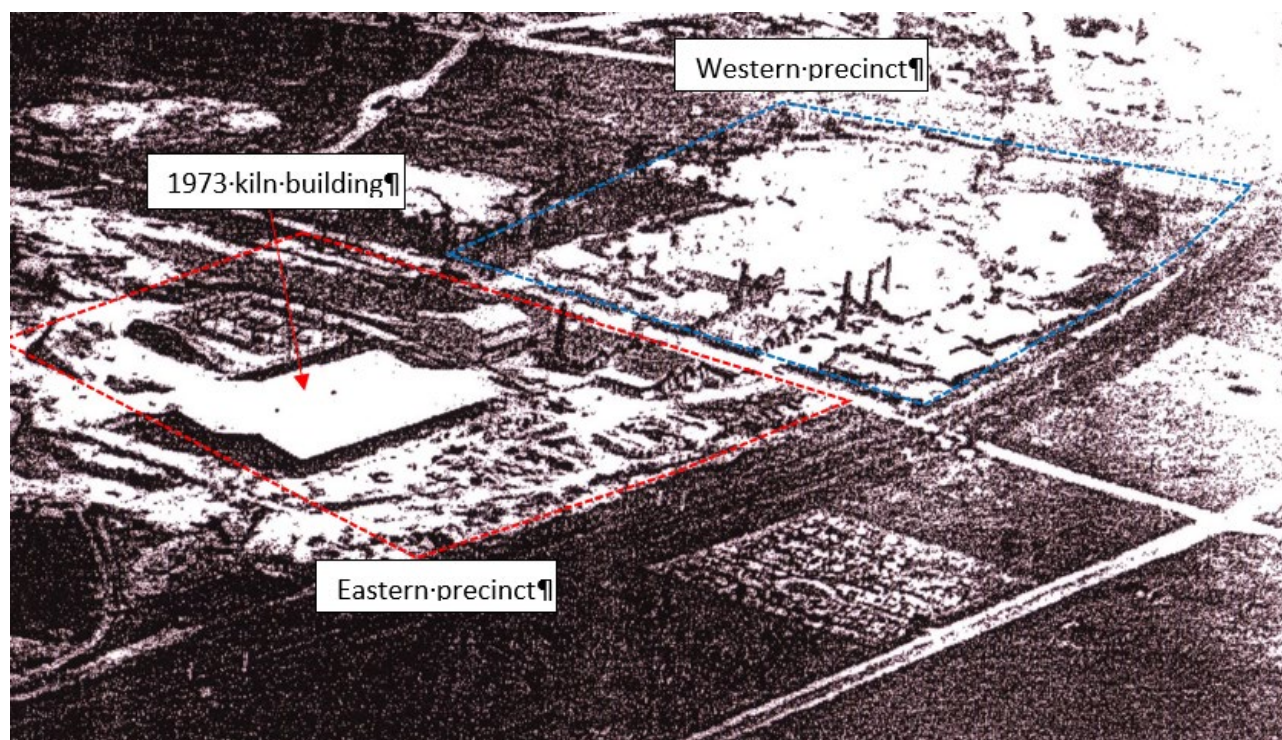


Figure 4.11 View facing southwest across the buildings of Turton's Brickworks, 16 April 1973

The current Project site is to the left of frame and not visible

Source: PGH Digital Records, 16 April 1973

4.3 The Government Railway

A brief history of the railway relevant to the Maitland area, including Metford, is provided in the *Maitland Heritage Survey Review, Thematic History, for Maitland Council* (Thorp in association with McDonald and Associates, 1994). This is outlined below with minimal change.

The first prospectus of the proposal to build a railway from Newcastle to Maitland, and then on to Singleton, materialised in 1846. However, due to minimal interest the proposal failed to gain traction at this time. Then, in 1853, a public meeting in Sydney was held to discuss the establishment of a rail link between Newcastle and Maitland.

Following this meeting, the Hunter River Railway Company was established and in the following year the survey of the Hunter rail line had been completed with construction starting soon after.

Not long after construction, the State government introduced a bill that allowed the government to take control of the railways and in 1855 it took possession of the Hunter River Railway Company's assets. A tender was accepted to build the line from Hexham to East Maitland, and in 1857 the Governor arrived to officially open the railway. In the same year a line was constructed from Honeysuckle Creek to East Maitland. The portion of the railway line that is located in proximity to the current Project site was therefore constructed at this time.

In 1858 the railway line was extended from Newcastle to West Maitland and from East to West Maitland. In 1860 the railway was extended to Lochinvar and from East Maitland to Morpeth in 1864. In 1864 a line was made from West Maitland to Singleton.

5.0 Previous Investigations of the Turton Brickworks

5.1 HLA-Envirosciences, 2003, A Heritage Assessment of Proposed Works, PGH Brickworks, Metford, prepared for PGH

In 2003 a heritage assessment of the PGH brickworks site was undertaken to inform an assessment of the potential impacts of proposed works at the site. Works proposed including the realignment of Metford Road, located to the east of the brickworks, the construction of a new sales office and display area, and the demolition of a number of structures and buildings within the brickworks as outlined below.

The following structures were identified and described as part of the 2003 study:

- The Brick Press Building

The brick press was observed to be a 20 x 16 m building, measuring 14 m in height and being clad in galvanised corrugated iron with a gabled roof. Walls were timber framed with no internal lining. The building had a number of annexes, the largest of which fronted Metford Road and measures 19 x 7 m in size.

The roof of the principal building was formed by a French truss with an extra member running from the wall studs to the truss on each side. The lower wall of the building was constructed of brick, and the floor was concrete.

In association with this building, other elements were also observed. This included: a winch and inclined tramway, bulk hopper, bucket elevators and mixing hoppers, which were in use from the 1930s to 1970s in association with the extraction of clay from the clay hole; conveyors from new loading areas established in approximately 1972 when clay was being trucked directly to the site; and new mixing, conveyors and presses, established in the 1970s when wet press machines replaced the dry press brick presses.

The brick press was assessed to have a high degree of significance as it contained a number of features related to the history of the site and displayed a high level of integrity and intactness. The study noted that brick press buildings are relatively rare survivors on preserved historical brickworks in Australia.

- Chimney

A square brick chimney dating from the 1930s was observed. This chimney served as a common flue for the six downdraft kilns formerly located within the eastern precinct. In 2002, this chimney was assessed to be in poor structural condition; it was subsequently demolished in 2004.

Prior to its removal from site, the chimney was assessed to have a moderate degree of significance as it related to the use of the area for down draft kilns, and had a good level of integrity despite its poor condition.

- Drying Building

The drying building was used for drying bricks manufactured in the wet press process. It was an open brick building lined with what was identified in 2003 as asbestos cement sheet installation.

The drying building was assessed to have little heritage significance as it related to a limited part of the site's history only.

- Shed

Also observed was a small brick tool shed, described as being of 'no particular significance'.

The shed was assessed to have little heritage significance as it related to a limited part of the site's history only.

- Down Draft Kilns and Flues

The 2003 inspection identified the archaeological remains of some of the down draft kilns, which were observed to be evident in the form of "I" section steel beams that had been cut off at ground level. The assessment noted that these beams would have supported the kiln roofs, and helped to tie the kilns together to resist thermal shock from repeated heating and cooling.

The report noted also that archaeological remains of the kilns were likely to have been retained on the site in the form of foundations and flues; the flues themselves were identified to have a greater degree of potential to be present, as they would have run underground to the chimney.

Any such archaeological features were assessed to have a moderate degree of significance, as the remains were considered likely to relate to the use of the site for down draft kilns. However, the potential for such remains to be present was assessed as low.

- Archaeological Potential

The 2003 assessment identified that the archaeological potential of the brickworks was relatively limited. It was acknowledged that archaeological remains such as foundations or other sub-surface elements had a low degree of potential to be present on site, and that such remains may reveal information regarding the location of former features of the site and the general site layout, which is not fully available within the historical record. It was also noted, however, that the nature and anticipated condition of such remains meant that it was unlikely that they would provide any useful information regarding 'what occurred on the site or the changes to the site', or any particularly detailed information regarding former equipment and technological processes used at the site (HLA-Envirosciences 2003: 8).

The assessment concluded that the potential archaeological resource may contribute to a more detailed recording of the location of features on the site, which would in turn enable a more detailed interpretation of available aerial photographs and historical mapping. No further research potential with regards to the potential archaeological resource was identified.

- Significance Assessment

The 2003 assessment made the following conclusions with regards to the overall significance of the brickworks site:

‘The former Turton’s or PGH Brickworks site is of moderate cultural significance because of its associations with the historical development of the brickmaking industry in Maitland and with one of the first families involved in brickmaking in the area. The brickmaking industry was an integral part of the economic development of Maitland. The site expresses this association through the continuity of the use of the site for brickmaking activities from the 1880s to the 1970s and with the site’s continued association with the Turton family during most of that time.’ (HLA-Envirosciences 2003: 10)

The brickworks were therefore assessed to have historical and associative significance, and a limited degree of research potential through the potential presence of foundations and flues relating to the works.

5.2 Umwelt, 2004, Archival Recording and Archaeological Investigation of the Chimney Stack at PGH Brickworks, Metford, prepared for CSR Building Products Limited

Umwelt were engaged in 2004 to undertake an archival recording, archaeological monitoring and archaeological investigation of an historic brick chimney stack within the main building complex of the eastern precinct of the brickworks. This assessment was required as the proposed realignment of Metford Road necessitated the demolition of the chimney stack, which had previously been identified to be in poor physical condition. Consent for the demolition of the stack was received from Council in October 2003, with consent requiring:

- The archival recording of the stack prior to demolition.
- Retention and preservation of the base of the stack.
- Monitoring of the demolition of the stack.
- Archaeological investigation of the base of the stack.

These works were undertaken, and following a comprehensive recording of the demolition of the stack to ground level and archaeological investigation of the base, the base was retained *in situ*, covered and sealed. The report recommended that the base be preserved *in situ* via more permanent weatherproofing and roofing, and that interpretation of the base be enabled through the installation of ‘viewing portals’.

5.3 Nexus Archaeology & Heritage, 2005, Assessment of Historical Archaeological and Research Design: Part of the PGH Brickworks Plant, Metford, NSW, prepared for PGH Bricks and Paving

Nexus was commissioned in 2005 to undertake a study and analysis of the historical archaeology of the site of proposed redevelopment of part of the Metford brickworks. The proposed redevelopment was to affect only a small area of the total site, located within the building complex of the eastern precinct and outside of the current project site. The area of impact previously contained a bank of downdraft kilns and an associated open area.

As part of this assessment, the significance of the brickworks site was considered and detailed as follows (Nexus 2005: 3.5-3.6):

- Represents evidence of a significant human activity, is associated with a significant activity and shows the continuity and evolutionary processes in its potential to reveal material and accessible information on an intermediate phase of the history of brickmaking in the Maitland and wider Hunter area.
- Has a strong relationship with the people involved in the development and functional aspects of brickmaking in its potential to demonstrate an evolutionary phase of that activity on a site that continues to be dedicated to that activity after the passage of perhaps 140 years.
- Demonstrates a high degree of technical achievement in exemplifying the particular technology employed in the construction of downdraught brick kilns and associated ventilation processes during the 1930s.
- Was an essential component in the urban development of the communities of, at least, the greater Maitland community.
- Is generally speaking an archaeological site, containing limited surface evidence of its original activities but, from an archaeological standpoint, has the potential to yield information about the style of design and construction employed in the installation of then leading technology for brickmaking.
- Specific elements of the subject site provide discrete opportunities for investigation of the techniques of building downdraught kilns and their exhaust ventilation system(s).
- Is (now) rare at the local level. There are possibly remains of similar kiln(s) at the site of the former Ashtonfield/Waterloo Brickworks (mainly firebrick manufacture) site at Thornton however the most likely location of this brickworks has been re-developed. The sites of Auckett's and Baker's brickworks have been cleared and re-developed. All except Baker hand-made bricks and clamp-fired. Baker introduced machines for forming semi-plastic bricks in the 1880s and for dry-pressed bricks in 1907. Baker's brickmaking plant is reputed to have been dumped as fill in the development of Fieldsend Oval, in Metford Road.
- Is representative at the State level.
- Based on the above assessment of significance, the report recommended that, where possible, works be re-designed so as to avoid impacts to areas of identified high archaeological potential. Where impacts cannot be avoided, it was recommended that archaeological excavation and/or monitoring works be undertaken, and all exposed archaeological material comprehensively reported.
- It is noted that areas of archaeological potential identified in this report were located to the northwest and outside of the current project site, and within the main building complex of the eastern precinct.
- No archaeological potential was identified within the current project site as part of the 2005 assessment.

5.4 Eureka Heritage, 2011, Statement of Heritage Impacts: Demolition of Standing Buildings, Former CSR-PGH Brickworks, Metford, prepared for ADW Johnson & CSR Building Products Limited

ADW Johnson commissioned Eureka Heritage to prepare a statement of heritage impact on behalf of their client CSR Building Products Limited (CSR).

The proposed works assessed included the demolition of all standing buildings associated with the former brickworks operation, which was to form the first stage in the remediation of the site and the eventual return of the land to the Crown.

The principal purpose of the study was to identify the (then) current heritage values of the site and any potential impact of the proposed works upon those values in order to prepare a statement of heritage impact in support of a development application to Maitland City Council.

The study concluded that, with the exception of the Brick Press Building, the demolition of the (then) existing buildings across the site would not significantly affect the immediate heritage environment, nor the heritage significance attached to the historical development of the site.

The proposed demolition of the Brick Press Building was determined to have a negative impact upon heritage values through the loss of a heritage resource, albeit a resource that was incomplete and degraded at the time of the study. However, it was considered that the proposed loss would be adequately mitigated through the study and recovery of historical information currently locked within the structure and its contents, and not currently in an accessible form.

To mitigate the loss of a heritage resource, management recommendations for the Brick Press Building were made including a full archival recording, monitored demolition, and the salvage of any heritage relics.

Though it is understood that these works were undertaken prior to full demolition of the former buildings on site, the relevant reporting was not provided to Umwelt during the preparation of the current HHA.

6.0 Visual Inspection

A visual inspection of the project site was undertaken by Karyn Cook (Principal Heritage Consultant) in June 2024. A visual inspection of a Project site is undertaken to determine the integrity of an item or site, and to understand the setting. The following section is a discussion of the general physical context of the Project site.

6.1 Results

The Project site was identified during the visual inspection to comprise highly disturbed and modified land. This disturbance is a result of both historical uses (quarrying and similar) associated with the former brickworks, as well as more contemporary uses (landscape modification) associated with the recent construction of the new Maitland Hospital (located to the immediate west).

No above-ground structures were observed to be present within the Project site. Some services were identified (such as drainage) as well as fencing, all of which appeared contemporary. No areas of historical archaeological potential were identified, nor were any building materials or other features that could indicate the presence of former structures.

The heritage listed railway line located to the north of the project site was not readily visible from the Project site. This is due to both the distance between the Project site and the heritage item, as well as the topography of the area and the presence of vegetation.

In views facing south towards the Project site from the northern side of the railway line, the Project site has limited visibility, again due to topography and existing vegetation screening. Within these views, the existing new Maitland Hospital is already somewhat visible. However, this visibility is limited by the presence of existing vegetation and the distance between the Hospital and the railway line. The Hospital is six-storeys in height, while the proposed building within the Project site will be two-storeys in height. It is therefore anticipated that the proposed new building within the Project site will have even less visibility than the existing new Maitland Hospital already does within these views.

The portion of the railway line that extends across the width of the Project site was not observed to have any distinctive or defining features of particular visual significance; in this area, the railway line presents as a standard rail line comprising standardised rails and sleepers on a slightly elevated embankment or at-grade.

The results of the visual inspection area demonstrated by the below photographs.



Photo 6.1 **General view of the Project site, facing northwest and showing the existing New Maitland Hospital**



Photo 6.2 **View across the Project site, facing northeast**



Photo 6.3 **View across the Project site, facing east**



Photo 6.4 **View across the Project site, facing north towards the railway line**



Photo 6.5 View across the Project site, facing west



Photo 6.6 View of the new Maitland Hospital in relation to the railway line (indicated by embankment)

Source: Google Street View 2023



Photo 6.7 Comparative view looking towards the Project site with the railway line visible (at-grade in this area)

Source: Google Street View 2023

7.0 Assessment of Built Heritage

7.1 Listed Heritage Items

Direct Impacts

As identified at **Section 2.0** above, there are no listed or previously identified items or elements of built heritage significance located within or in immediate proximity to the current Project site.

All structures associated with the former Turton Brickworks are evidenced in the historical record to have been located outside and to the northwest of the current Project site. There is no information in the historical record to suggest that any structures of potential heritage significance associated with either the former Turton Brickworks or any land uses/ownership that preceded the brickworks were present within the current Project site (refer to **Section 7.2** below for further discussion).

Irrespective of this, it is noted that:

- All of the above ground built heritage elements identified in the 2003 heritage assessment of the eastern precinct of the former brickworks were subject to heritage assessments, archival recording and complete demolition.
- All structures identified to have been previously present in the western precinct of the former brickworks were not subject to archival recording, but have been subject to complete demolition and were subject to assessment prior to this demolition.
- The former Turton Brickworks site is not subject to any formal heritage listings.
- Based on the above, the proposed project does not have any potential to directly impact on any listed heritage items or potential listed heritage items. This is supported by the visual inspection presented at **Section 6.0**, which confirmed that no above-ground structures are present within the Project site.

Indirect (Vicinity) Impacts

The closest listed heritage item to the project site is identified in Schedule 5 of the Maitland LEP 2011 as 'Government Railway' (Item ID I119). This heritage item is located approximately 240 m to the north of the current project site.

No identified physical or visual relationship exists between the project site and this locally listed heritage item. This is due to:

- The distance that exists between the heritage item and the project site.
- The topography of the surrounding landscape, much of which has been highly modified.
- The nature of the rail line as a visually unobtrusive (at-grade or very low-scale) element within the landscape. The portion of the rail line that is located in proximity to the Project site does not comprise any built structures or elements of heritage significance (aside from the rail itself), and therefore does not have a strong visual presence in any views to or from the current Project site.

- Given the scale of the proposed development (two-storey), particularly in contrast to the scale of the existing new Maitland Hospital (six-storey) it is not anticipated that the proposed Project will result in any greater visual impacts on the railway line than the new Maitland Hospital has already had, which are minimal.
- The above has been confirmed by the visual inspection of the project site presented at **Section 6.0** of this report.

All other listed or previously identified built heritage items are located more than 1 m away from the Project site, and have no discernible physical or visual relationship to the Project site. This has also been confirmed by the visual inspection of the Project site presented at **Section 6.0** of this report.

As such, the proposed Project will not result in any indirect (visual) impacts to any listed heritage items located in the vicinity of the project site. The proposed project will not be readily visible from within existing views to or from heritage items located in the vicinity. Where a degree of visibility exists (limited to being in association with the 'Government Railway' listing), this visibility is minimal, and will not result in any adverse impacts to the heritage significance or visual presentation and setting of the heritage item.

Based on the above, the proposed Project does not have any potential to indirectly (visually) impact on any listed heritage items or potential listed heritage items located in the vicinity of the Project site.

7.2 Built Heritage within the Project Site

Although the current Project site formed part of the overall former brickworks site, there is no evidence in the historical record to suggest that any buildings or structures associated with this use were ever constructed within the Project site. Rather, it appears that the area to the south of the main building complex, which forms the Project site, was used primarily for the purposes of quarrying, or was otherwise maintained as non-impacted land.

Prior to its incorporation into the Turton Brickworks site, the Project site formed part of a wider parcel of land that was vested in the Municipal Council of East Maitland for the purposes of public use (e.g. recreational use, etc). There is no evidence in the historical record to suggest that the Project site was ever subject to any development or modification in association with its dedication for public use.

Former buildings and structures associated with the use of the overall site as a brickworks were identified in the 2003 heritage assessment as being of heritage significance. In particular, the former brick press building was identified to be of high significance, while the former chimney and any sub-surface remains of former kilns were identified to be of moderate significance.

As already noted, however, none of these structures were located within the current Project site; the historical record strongly suggests that all former structures associated with the brickworks were located within the western precinct on the opposite side of Metford Road, or to the northwest of the current Project site and within an established building complex.

In addition to this, all former above-ground buildings or structural elements associated with the use of the overall site as a brickworks have been demolished in their entirety to at least the current ground level.

It is also understood that a full archival recording of the eastern precinct was undertaken in approximately 2011 and prior to demolition works, which comprehensively documented all buildings and structures that were present on the site at that time. It is noted, however, that a copy of this recording has not yet been provided to Umwelt for reference.

7.3 Identified Opportunities and Constraints

Based on the above discussion, there are no identified built heritage constraints associated with the Project site.

8.0 Assessment of Historical Archaeological Potential

Based on a review of the historical record of the project site and wider brickworks site, as well as a review of previous investigations or studies that have been undertaken for the site, the following assessment of historical archaeological potential has been prepared.

8.1 Assessment of Historical Archaeological Potential

As already outlined above, the Project site originally formed part of a wider parcel of land that was vested in the Municipal Council of East Maitland for the purposes of public use. There is no evidence in the historical record to suggest that the project site was ever subject to any development or modification in association with its dedication for public use.

Further, although the current Project site formed part of the overall brickworks, there is no evidence in the historical record to suggest that any buildings or structures associated with this use were ever constructed within the Project site. All known or recorded built form was located to the northwest of the current Project site and within the main building complex of the eastern precinct. The historical record strongly suggests that the land to the south of the main building complex, which encompasses the current Project site, was not subject to any development, but was used for the purposes of quarrying and/or maintained as undeveloped land.

Whilst there remains potential for sub-surface archaeological remains of previous structures of built elements to be present on the overall brickworks site (as demonstrated by the works and results of previous assessments outlined at **Section 4.3**), this is limited to areas known to have been subject to such development, and does not extend into the current Project site.

Further to this, the Project site has been substantially impacted through its use as a quarry site as well as in association with later landscape modifications; evidence of this impact was clearly observed during the visual inspection of the project site. These works are highly likely to have removed and/or severely impacted any potential occupational or miscellaneous material that may have been deposited within the Project site over time and in association with its use as part of a larger brickworks.

In addition to the level of disturbance evidenced in the historical record, the visual inspection of the Project site confirmed that it has been severely disturbed. No evidence of a potential archaeological resource or prior use of the Project site that may have resulted in any archaeological remains being present was identified during the visual inspection.

Overall, the Project site is not assessed to have any identified historical archaeological potential.

8.2 Assessment of Historical Archaeological Significance

The Project site does not have any identified historical archaeological potential, as discussed above. An assessment of the potential significance of any historical archaeological remains is therefore not considered to be warranted.

8.3 Identified Opportunities and Constraints

There are no identified historical archaeological constraints associated with the current Project site.

9.0 Impact Assessment

9.1 Potential Historical Heritage Impacts

9.1.1 Built Heritage

Based on the discussion presented at **Section 7.0** of this report, there are no identified built heritage constraints to the proposed redevelopment of the Project site.

9.1.2 Historical Archaeological Resource

Based on the discussion presented at **Section 8.0** of this report, there are no identified historical archaeological constraints to the proposed redevelopment of the Project site.

However, it is noted that this impact assessment applies to the Project site only, as defined in **Figure 1.1** and **Figure 1.2**. Any works proposed outside of this area, and particularly within areas known to have previously contained buildings or structures associated with the former brickworks may require a specific, separate historical archaeological assessment.

10.0 Conclusions and Recommendations

Overall, no historical heritage constraints have been identified for the current Project site. There are therefore no identified constraints to the proposed redevelopment of the Project site for the purposes of the MMHR Project.

10.1 Recommendations and Mitigation Measures

The proposed works may proceed without any further historical heritage assessment or investigation, provided that the impacts and extent of the proposed works are consistent with those discussed in this report. Works should, however, proceed with caution noting the recommendations in **Table 10.1**.

Table 10.1 Mitigation Measures

Project Stage	Mitigation Measures
Construction	All persons working on site should be made aware of their obligations and requirements in relation to the relevant provisions of the Heritage Act.
Construction	In the unlikely event that historical archaeological remains are exposed during proposed sub-surface works, work must cease, an appropriately qualified archaeologist consulted with and, if appropriate, Heritage NSW/the NSW Heritage Council notified in accordance with Section 146 of the Heritage Act.

11.0 References

11.1 References

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11.2 Newspaper Articles

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