

**Parramatta East Public School Upgrade,
30-32 Brabyn St, Parramatta,
City of Parramatta, NSW**
Statement of Heritage Impact

Prepared for Johnstaff on behalf of NSW Department of Education

March 2025

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ARCHAEOLOGICAL SERVICES



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Executive Summary

This Statement of Heritage Impact (SoHI) has been prepared by Kayandel on behalf of the NSW Department of Education to assess the potential environmental impacts that could arise from the Parramatta East Public School (PEPS) upgrade (the **Proposal**) at 30-32 Brabyn Street, North Parramatta (the **site**). The works are proposed by the NSW Department of Education to meet the growth in educational demand in Collet Park precinct, and the broader North Parramatta area.

The purpose of this SoHI to inform the Review of Environmental Factors (REF) which will assess the potential environmental impacts of the activity prescribed by *State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&I SEPP)* as “development permitted without consent” on land carried out by or on behalf of a public authority under Part 5 of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*. The activity is to be undertaken pursuant to Chapter 3, Part 3.4, Section 3.37 of the *T&I SEPP*.

This SoHI has been prepared to document the results of the site inspection which was undertaken to determine the extent of historical significance of the site.

The site is not identified as or adjacent to a heritage item on Schedule 5 of the LEP, nor is it located within a Conservation Area (refer to Figure 3). However, it extends across two PHALMS Units, 3068 (Parramatta East Public School) and 3196 (Urban area bounded by Victoria Road, Pennant and Macarthur Streets, Symonds Avenue, Teale Place, the Parramatta East Public School) (refer to Figure 4), which are considered to have local heritage significance.

The inspection has graded Blocks A to H have moderate built fabric significance within the local area and separately assessed as also not having heritage significance (refer to Section 5.5).

The PHALMS Archaeological Research Potential assessment of the site identified that the northern portion had little potential, while the southern portion, the play fields had moderate potential (refer to Figure 22). However, review of the research potential for PHALMS Unit 3068 (the northern portion of the site) has identified that the assessment in Figure 22 is inconsistent with the assessment of moderate archaeological research potential detailed in the State Heritage Inventory entry for the item (refer to Section 5.3).

The site's history suggests that any archaeological material present will vary as different parts of the site had different uses. While the site extends through the northwestern corner of the former Town Boundary Farm No. 7, which is from the early phase of settlement in the Parramatta (refer to Figure 5 and Figure 6), these maps do not indicate the presence of any built structures. Any archaeological remains associated with former Town Boundary Farm No. 7 would most likely be associated with the property boundaries and evidence of early farming practices dating from the late 18th century. Examples of these types of remains are also well documented elsewhere, such as in Parramatta Park.

The current flooring of the Blocks D, E, A, B, C, F, G, and H are a mixture of lino and carpet, these types of flooring will have reduced the amount of subfloor deposit that would normally accumulate under uncovered floors post their installation. Any archaeological remains associated with these buildings will most likely consist of day-to-day items discarded by users. It is unlikely that any of this material would contribute to any further knowledge about the use of the buildings.

This SoHI has assessed that there is low potential for archaeological remains or relics associated with former Town Boundary Farm No. 7 (PHALMS Units 3068) to be present within the Project Area.

The European heritage mitigation measures that apply to the project are presented in Table 7.

CONTENTS

1	Introduction	1
1.1	Summary of the Activity	1
1.2	Site Description	2
1.3	Significance of Environmental Impacts	2
1.4	Approach and Methodology	2
1.5	Study Limitations	3
1.6	Authorship	3
1.7	Terminology	3
2	Heritage Planning Context	7
2.1	Commonwealth Legislation	7
2.1.1	Environment Protection & Biodiversity Conservation Act 1999 (EPBC Act)	7
2.2	New South Wales Legislation	8
2.2.1	Environmental Planning and Assessment Act 1979 (NSW)	8
2.2.2	State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&I SEPP)	8
2.2.3	The Heritage Act 1977 (NSW) (Amended 1999)	8
2.2.3.1	State Heritage Register	9
2.2.3.2	Archaeological Relics	9
2.2.3.3	S.170 Register	10
2.3	Non-Statutory Listings	10
2.3.1	Register of the National Estate	10
2.3.2	National Trust of Australia (NSW) Register	10
2.4	Heritage in the Vicinity	11
3	Historical Context	14
3.1	Early History (1790s-1810s)	14
3.2	Township Reserve	15
3.3	Reverend Samuel Marsden's Land Grant	16
3.4	History of the Site	18
4	Physical Description	33
4.1	Site Layout	33
4.2	Built Structures	36
4.2.1	The c. 1950s Classrooms	36
4.2.2	The c. 1970s Buildings	42
4.2.3	Demountable buildings (c. 2009-2019)	43

4.3	Settings and Views	44
4.4	Features	45
4.5	Archaeological Potential	45
4.5.1	Integrity of sub-surface/subfloor deposits	46
4.5.2	Research Potential	48
5	Heritage Significance.....	51
5.1	Significance Assessment Criterion	51
5.2	Levels of Heritage Significance	52
5.3	Established Significance Assessment of Parramatta Archaeological Management Unit 3068 52	
5.4	Established Significance Assessment of Parramatta Archaeological Management Unit 3196 53	
5.5	Significance Assessment of Buildings within the Site	55
6	Heritage Impact Assessment	61
6.1	Criteria for Quantifying Heritage Impact(s)	61
6.2	Assessment against Local Planning Controls	61
6.2.1	Assessment against the <i>Parramatta LEP 2023</i>	62
6.2.2	Assessment against the <i>Parramatta Development Control Plan 2023</i>	63
6.3	Consideration of Heritage NSW's Guidelines.....	63
6.3.1	Alterations and additions	64
7	Mitigation Measures	67
8	References	68

LIST OF TABLES

Table 1: Kayandel personnel involved with the preparation of this report	3
Table 2: Summary of Historic Aerial Photographs.....	21
Table 3: Established Assessment of Significance for PHALMS Unit 3068 (source: Heritage NSW (2024a))	53
Table 4: Established Assessment of Significance for PHALMS Unit 3196 (source: Heritage NSW (2024b))	54
Table 5: Grading of Significance.....	55
Table 6: Evaluation and statements of significance of buildings within the Site	60
Table 7: European Heritage Mitigation Measures	67

LIST OF FIGURES

Figure 1: Site Plan Proposed	5
Figure 2: Site Aerial	6
Figure 3: Heritage Items in the Vicinity of the Site	12
Figure 4: PHALMS Archaeological Management Units with the site outlined in red (source: Godden Mackay Logan (2000b))	13
Figure 5: Detail of site (outlined) from c1791 map showing the towns of Parramatta and settlements of Rose Hill, Field of Mars and Toongabbie (source: Godden Mackay Logan (2000b))	14
Figure 6: Field of Mars Parish map (n.d.) (source: Land and Property Information, Historical Land Records Viewer). Approximate location of the site is circled in yellow.....	15
Figure 7: Plan of the late Rev. Samuel Marsden's estate as subdivided (Bemi, c. 1840) (source: State Library NSW, Z/M2 811.1312/1840/1 , M2 811.1312/1840/1). Approximate location of the site outlined.	17
Figure 8: Detail of site (outlined) from c.1871 plan of the environs of Parramatta, County of Cumberland (source: Godden Mackay Logan (2000b). Note that the map shows the earlier boundary of Rev. Marsden's 18 acre grant	18
Figure 9: Parish Field of Mars, County of Cumberland Sheet 2 (c.1910) (source: HLRV). Approximate location of the site is outlined in red	19
Figure 10: Map of Parramatta c.1961 (source: HLRV). Location of the site is outlined in red	20
Figure 11: 1930 aerial photograph (source: Historical Aerial Photography – Foundation Spatial Data). Approximate location of the site is outlined in red	22
Figure 12: 1943 aerial photograph (source: Historical Imagery Viewer). The site is outlined in red ...	23
Figure 13: 1951 aerial photograph (source: Historical Imagery Viewer). The site is outlined in red ...	24
Figure 14: 1955 aerial photograph (source: Historical Imagery Viewer). The site is outlined in red ...	25
Figure 15: 1965 aerial photograph (source: Historical Imagery Viewer). The site is outlined in red ...	26
Figure 16: 1978 aerial photograph (source: Historical Imagery Viewer). The site is outlined in red ...	27
Figure 17: 1986 aerial photograph (source: Historical Imagery Viewer). The site is outlined in red ...	28
Figure 18: 1996 aerial photograph (source: Historical Imagery Viewer). The site is outlined in red ...	29
Figure 19: 2005 aerial photograph (source: Historical Imagery Viewer). The site is outlined in red ...	30
Figure 20: 2009 aerial photograph (source: Nearmap). The site is outlined in red.....	31
Figure 21: 2017 aerial photograph (source: Nearmap). The site is outlined in red.....	32
Figure 22: PHALMS Archaeological Research Potential with the site outlined in red (source: Godden Mackay Logan (2000b))	50
Figure 23: PHALMS Indicative Requirements Recommended for Archaeological Investigation in the Parramatta Region with the site outlined in red (source: Godden Mackay Logan (2000b)).....	66

LIST OF PLATES

Plate 1: General view of the playground at the northern end of the campus	33
Plate 2: View of the Large COLA.....	33
Plate 3: View of across the hardstand play area and COLA	34
Plate 4: View along uncovered path towards northern buildings	34
Plate 5: View towards the northern end of the Hall	34
Plate 6: The school vegetable gardens.....	34
Plate 7: General view of the built playground area	34
Plate 8: General view of the playground looking towards the school buildings	34
Plate 9: Looking east along covered walkway	35
Plate 10: Example of GSV in the playground.....	35
Plate 11: Example of the change in GSV between high traffic areas and the rest of the playground	35
Plate 12: Installed play equipment.....	35
Plate 13: Mature planting at the northeastern corner of Block H	35
Plate 14: Closeup of mature planting at the northeastern corner of Block H	35
Plate 15: Northern façade of Block D	37
Plate 16: Southern façade of Block D.....	37
Plate 17: View of the western end of Block D's verandah.....	37
Plate 18: Looking between Block D (left) and Block E (right)	37
Plate 19: Northern elevation of Block E.....	37
Plate 20: Looking along the Block E verandah.....	37
Plate 21: Southern façade of Block E	38
Plate 22: Looking towards the southern façade of Blocks D (right) and E (middle)	38
Plate 23: View of Block A.....	38
Plate 24: Eastern elevation of Block A	38
Plate 25: Exterior wall of Block A inside enclosed verandah.....	38
Plate 26: Example of interior wall in Block A.....	38
Plate 27: View towards the extension in Block A	39
Plate 28: View of Block B	39
Plate 29: Block B northern facade.....	39
Plate 30: Looking towards southern elevation of Block B	39
Plate 31: Northern elevation of Block C.....	39

Plate 32: Side steps to access the rear verandah	39
Plate 33: Close up of Block C northern façade – eastern end	40
Plate 34: Close up of Block C northern façade – western end	40
Plate 35: Block C southern façade – western end	40
Plate 36: Block C southern façade – eastern end	40
Plate 37: Example of section of Block C	40
Plate 38: View along the corridor of Block C	40
Plate 39: View of workspace in Block C	41
Plate 40: View of Block F	41
Plate 41: Close up of the northern façade of Block F – eastern end	41
Plate 42: View of the enclosed verandah in Block F	41
Plate 43: Block G open verandah	41
Plate 44: View under Block G verandah	41
Plate 45: Example of internal windows in Block G	42
Plate 46: General view from inside Block G	42
Plate 47: Looking towards Block H	42
Plate 48: General view of Block H open verandah	42
Plate 49: Block H open verandah	42
Plate 50: Looking towards Block H from Brabyn St	42
Plate 51: Rear of Block H	43
Plate 52: Looking towards the rear of Block H from Brabyn St	43
Plate 53: Block J	43
Plate 54: Eastern end of Block J	43
Plate 55: View east between the demountables	43
Plate 56: View west between the demountables	43
Plate 57: View of demountable classroom	44
Plate 58: View of demountable classroom in the south-eastern campus of the campus	44
Plate 59: Looking west between demountable buildings	44
Plate 60: View from Brabyn Street of demountable building between Blocks F and G	44
Plate 61: View from Brabyn Street of demountable buildings	44
Plate 62: View from Brabyn Street of demountable building to the rear of Block G	44
Plate 63: Remains of a possible sandstone marker at the corner of Brabyn St and Albert St E	45

Plate 64: Closeup of the possible sandstone marker	45
Plate 65: Remains of clay pipes.....	47
Plate 66: Remains of brick foundations	47
Plate 67: Remains of brick foundations (front) and concrete slab (middle)	47
Plate 68: Remains of former residential structures	48
Plate 69: Remains of former residential garden.....	48
Plate 70: Section of concrete garden retaining wall.....	48

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1 INTRODUCTION

This Statement of Heritage Impact (SoHI) has been prepared by Kayandel on behalf of the NSW Department of Education to assess the potential environmental impacts that could arise from the Parramatta East Public School (PEPS) upgrade (the **Proposal**) at 30-32 Brabyn Street, North Parramatta (the **site**). The works are proposed by the NSW Department of Education to meet the growth in educational demand in Collet Park precinct, and the broader North Parramatta area.

The purpose of this SoHI to inform the Review of Environmental Factors (REF) which will assess the potential environmental impacts of the activity prescribed by *State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&I SEPP)* as "development permitted without consent" on land carried out by or on behalf of a public authority under Part 5 of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*. The activity is to be undertaken pursuant to Chapter 3, Part 3.4, Section 3.37 of the *T&I SEPP*.

This report has been prepared to assess whether the site has European heritage values and significance, and to identify if there is potential for European archaeological deposits to be present.

Review of the relevant heritage registers have identified that Parramatta East Public School is not identified as a heritage item, adjacent to a heritage item, or within a Conservation Area.

The search of the State Heritage Inventory (SHI) identified that the site is situated **within** the following areas that were identified by the Godden Mackay Logan (2000a, 2000b) Parramatta Historical Archaeological Landscape Management Study (PHALMS) (refer to Figure 4):

- Parramatta Archaeological Management Unit 3068 (Parramatta East Public School) – local significance and moderate potential (Heritage NSW, 2024a); and,
- Parramatta Archaeological Management Unit 3196 (Urban area bounded by Victoria Road, Pennant and Macarthur Streets, Symonds Avenue, Teale Place, the Parramatta East Public School) – local significance and moderate potential (Heritage NSW, 2024b).

Section 7.7 (Archaeology) of the *Parramatta Development Control Plan 2023* requires that where a Development Application for a property included in the PHALMS area, will involve excavation, such as the current proposal (Section 1.1), Council requires that applicants refer in their Statement of Environmental Effects (SEE) to the Recommended Management of the site as set out in the PHALMS. The SoHI has been prepared to inform the SEE.

1.1 Summary of the Activity

The activity comprises upgrades to PEPS to provide replacement teaching facilities in place of the existing temporary and permanent facilities that are no longer fit for purpose, involving the following works:

- Site preparation and required earthworks;
- Demolition of existing Buildings C, D, E and F, and associated structures including adjacent ramps and walkways;
- Construction of the following:
 - A new 3-storey school building (referred to as Block R) including teaching spaces, library/administration, and staff/student amenities;
 - Upgrade of soft and hard landscape and playground areas;
 - A new at-grade parking area;
 - Formalised waste area, with access being retained from Gaggin Street;

- Public Domain Works with upgrades to the pedestrian access south of the school, and new kiss and ride zone on Albert Street East;
- Entrance and School logo signage along the Northern Albert Street East frontage of Block R;
- Refurbishment works to existing buildings;
- Removal of trees as required and retention where possible; and
- Installation and augmentation of services and infrastructure as required.

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

Refer to Figure 1 for the plan for the proposed upgrade works.

1.2 Site Description

The site is located at Brabyn Street within the City of Parramatta (CoP) Local Government Area (LGA), Parish of Field of Mars in the County of Cumberland. The site is approximately 1.5km northeast of the Parramatta CBD, and 24km west of the Sydney CBD.

The site currently comprises a single lot to make up Parramatta East Public School, referred to as Lot 100, DP1312418, and the land is owned by the Minister for Education and Early Learning.

The site has an area of approximately 16,250m², is of an irregular shape, and is bounded by Brabyn Street to the West, Albert Street East to the North, and Gaggin Street/Webb Street to the East.

An aerial image of the site is shown in and Figure 2.

1.3 Significance of Environmental Impacts

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

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

1.4 Approach and Methodology

This report provides a heritage assessment to identify if any heritage items or relics exist within or in the vicinity of the site. The heritage significance of these heritage items has been investigated and assessed in order to determine the most appropriate management strategy.

The works detailed in Section 1.1 have been assessed in relation to the relevant controls and provisions contained within the following:

- *Guidelines for preparing a statement of heritage impact (NSW Department of Planning and Environment, 2023a);*
- *Assessing heritage significance: Guidelines for assessing places and objects against the Heritage Council of NSW criteria (NSW Department of Planning and Environment, 2023a); and,*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&I SEPP).*

As previously stated the activity is proceeding as a “development permitted without consent” in accordance with Chapter 3, Part 3.4, Section 3.37 of the T&I SEPP, and as such local environmental plans and planning controls do not apply. However, in Section 6.2 as part of assessing whether the

activity would have an impact on local heritage, and if so to what degree, the below local planning instruments have been considered:

- *Parramatta LEP 2023; and,*
- *Parramatta Development Control Plan 2023.*

Research for this SoHI has adopted a two-stepped approach. Step 1 involving a desktop assessment and Step 2 being a site survey. This document provides the findings and recommendations resulting from this approach.

Step 1

Research into the early development of the site was undertaken as part of the Kayandel (2024) Preliminary Heritage Advice to get a better understanding of the place. Further, the State Heritage Inventory (SHI) was examined to determine the known heritage values of the site.

Step 2

An onsite survey of the site and the context of its setting was conducted by Natalie Stiles in September 2022 with the purpose of photographing and understanding the place. All results are presented in Section 4.

1.5 Study Limitations

This report is limited to the analysis of European cultural values.

Recommendations have been made on the basis of documentary evidence viewed and inspection of the site. This report only addresses the relevant heritage planning provisions and does not address general planning or environmental management considerations.

The 'Statement of Significance for the site' (Section 5.3) made in this report is a combination of both facts and interpretation of those facts in accordance with a standard set of assessment criteria. It is possible that another professional may interpret the historic archaeological landscape within the Prospect area and physical evidence in a different way.

1.6 Authorship

This study has been carried out by the following Kayandel team members (refer to Table 1).

Person	Qualification	Experience	Tasks
Natalie Stiles	B. Arts (Arch/Palaeo), Grad. Cert. Arts (Arch), MGIS&RemoteSens, GradDipUrbRegPlan	>10 years	Mapping, survey, background research, and report drafting
Lance Syme	B. Arts (Arch/Palaeo), Grad. Dip. (Heritage Cons.), M. ICOMOS	>20 years	Project supervision and report review
Sara Fioretti	BArch and MRes (Spec. Arch)	5 years	Background research and report writing

Table 1: Kayandel personnel involved with the preparation of this report

1.7 Terminology

The terminology in this report follows definitions presented in the *Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance* (Australia ICOMOS, 2013). Article 1 provides the following definitions:

Place	means a geographically defined area. It may include elements, objects, spaces and views. Place may have tangible and intangible dimensions.
Cultural significance	means aesthetic, historic, scientific, social or spiritual value for past, present or future generations. Cultural significance is embodied in the place itself, its <i>fabric, setting, use, associations, meanings, records, related places and related objects</i> . Places may have a range of values for different individuals or groups.
Fabric	means all the physical material of the <i>place</i> including elements, fixtures, contents and objects.
Conservation	means all the processes of looking after a place so as to retain its <i>cultural significance</i> .
Maintenance	means the continuous protective care of a <i>place</i> , and its <i>setting</i> . Maintenance is to be distinguished from repair which involves <i>restoration or reconstruction</i> .
Preservation	means maintaining a <i>place</i> in its existing state and retarding deterioration.
Restoration	means returning a <i>place</i> to a known earlier state by removing accretions or by reassembling existing elements without the introduction of new material.
Reconstruction	means returning a <i>place</i> to a known earlier state and is distinguished from <i>restoration</i> by the introduction of new material.
Adaptation	means changing a <i>place</i> to suit the existing use or a proposed use.
Use	means the functions of a <i>place</i> , including the activities and traditional and customary practices that may occur at the place or are dependent on the place.
Compatible use	means a <i>use</i> which respects the <i>cultural significance</i> of a <i>place</i> . Such a use involves no, or minimal, impact on cultural significance.
Setting	means the immediate and extended environment of a <i>place</i> that is part of or contributes to its <i>cultural significance</i> and distinctive character.
Related place	means a <i>place</i> that contributes to the <i>cultural significance</i> of another place.
Related object	means an object that contributes to the <i>cultural significance</i> of a <i>place</i> but is not at the place.
Associations	mean the connections that exist between people and a <i>place</i> .
Meanings	denote what a <i>place</i> signifies, indicates, evokes or expresses to people. Meanings generally relate to intangible dimensions such as symbolic qualities and memories.
Interpretation	means all the ways of presenting the <i>cultural significance</i> of a <i>place</i> .





Figure 2: Site Aerial

2 Heritage Planning Context

The site has been assessed against the following statutory and non-statutory controls pertinent to built heritage and historical archaeology:

- *Environment Protection and Biodiversity Conservation Act 1999*
- *Heritage Act 1977 (NSW)*
- *Environmental Planning and Assessment Act 1979*
 - *Parramatta Local Environmental Plan 2023*
 - *Parramatta Development Control Plan 2023*

2.1 Commonwealth Legislation

2.1.1 Environment Protection & Biodiversity Conservation Act 1999 (EPBC Act)

The *Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)* took effect on 16 July 2000. Under Part 9 of the *EPBC Act*, any action that has, or is likely to have, a significant impact on a matter of National Environmental Significance (NES) (known as a controlled action under the *EPBC Act*), may only progress with approval of the Commonwealth Minister for the Environment. An action is defined as a project, development, undertaking, activity (or series of activities), or alteration to any of these. Where an exception applies, an action will also require approval if:

It is undertaken on Commonwealth land and will have or is likely to have a significant impact;

1. It is undertaken outside Commonwealth land and will have or is likely to have a significant impact on the environment on Commonwealth land; and,
2. It is undertaken by the Commonwealth and will have or is likely to have a significant impact.

Under Section 28 subsection (1) "The Commonwealth or Commonwealth Agency must not take inside or outside Australian jurisdiction an action that has, will have, or is likely to have a significant impact on the environment inside or outside Australian jurisdiction." The *EPBC Act* defines 'environment' as both natural and cultural environments and therefore Aboriginal and historic cultural heritage items included on the Register of the National Estate are regarded as part of the cultural environment.

The *EPBC Act* includes provisions to protect matters of NES and Commonwealth land. Lists and registers made under the *EPBC Act* include:

- *The Environment and Heritage Legislation Amendment Act (No.1) 2003;*
- *The Australian Heritage Council Act 2003;* and,
- *The Australian Heritage Council (Consequential and Transitional Provisions) Act 2003.*

Approval under the *EPBC Act* is required if you are proposing to take an action that will have, or is likely to have, a significant impact on the National Heritage values of a National Heritage place and/or any other NES matter. This action must be referred to the Australian Government Minister for the Environment and Heritage. The Minister will decide whether an action will, or is likely to, have a significant impact on a matter of national environmental significance.

The heritage provisions of the *EPBC Act* allow for a transition period whilst the National and Commonwealth Heritage Lists are finalised. During this transition period the Register of the National Estate acts in conjunction with the formative National and Commonwealth lists to provide full coverage for items already identified as having cultural heritage significance.

The site **is not** included on the Commonwealth and National Heritage Lists under the *Environmental Protection and Biodiversity Act 1999*.

2.2 New South Wales Legislation

2.2.1 Environmental Planning and Assessment Act 1979 (NSW)

The *Environmental Planning and Assessment Act, 1979* (NSW) (*EP&A Act*) requires that consideration be given to environmental impacts as part of the land use planning process. This includes impacts on Aboriginal and non-Aboriginal cultural heritage items and places. The Act also requires that Local Government Areas (LGAs) prepare Local Environmental Plans (LEP) and Development Control Plans (DCP) in accordance with the Act to provide guidance on the level of environmental assessment required. LEPs often list locally significant heritage items. Three parts of the *EP&A Act* are most relevant to Heritage. Part 3 relates to planning instruments, including those at local and regional levels; Part 4 controls development assessment processes; and Part 5 refers to approvals by determining authorities.

2.2.2 State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&I SEPP)

Chapter 3 (Educational Establishments and Child Care Facilities) of the *State Environmental Planning Policy (Transport and Infrastructure) 2021* (T&I SEPP) aims to effective delivery of child-care providers, schools, TAFE campuses and Universities to build new facilities and improve existing ones by streamlining approval processes and consistency of development requirements throughout the State.

Section 2.11 (consultation with Councils - development with impacts on local heritage) applies only if the proposal is likely to have an impact that is not minor or inconsequential on a local heritage item. The site **is not** listed as a local heritage item, nor it is located within a conservation area on Schedule 5 of the *Parramatta Local Environmental Plan (LEP) 2023* (refer to Figure 3).

A search of the State Heritage Inventory (SHI) identified that the site is situated **within** the following:

- Parramatta Archaeological Management Unit 3068 (Parramatta East Public School) – local significance and moderate potential; and,
- Parramatta Archaeological Management Unit 3196 (Urban area bounded by Victoria Road, Pennant and Macarthur Streets, Symonds Avenue, Teale Place, the Parramatta East Public School) – local significance and moderate potential.

These were identified by the Godden Mackay Logan (2000a, 2000b) Parramatta Historical Archaeological Landscape Management Study (PHALMS) (refer to Figure 4). However, neither of which are identified as a local heritage item on the LEP. As the site, itself, is not listed as a local heritage item, consultation with any Council is not required.

2.2.3 The Heritage Act 1977 (NSW) (Amended 1999)

The *NSW Heritage Act 1977* (*Heritage Act*) provides protection for items of 'environmental heritage' in NSW. 'Environmental heritage' includes places, buildings, works, relics, movable objects, or precincts considered significant based on historical, scientific, cultural, social, archaeological, architectural, natural, or aesthetic values. Items considered to be significant to the State are listed on the State Heritage Register (SHR) and cannot be demolished, altered, moved, or damaged, or their significance altered without approval from the Heritage NSW.

The *Heritage Act* does not apply to Aboriginal "relics" (any deposit, object, or material evidence). These items are protected under the *National Parks and Wildlife Act 1974*; however, some aspects of

Aboriginal cultural heritage management and protection are covered by provisions of the *Heritage Act*.

2.2.3.1 State Heritage Register

Protection of items of State significance is by nomination and listing on the SHR created under Part 3A of the *Heritage Act 1977*. The Register came into effect on 2 April 1999. The Register was established under the *Heritage Amendment Act 1998*. It replaces the earlier system of Permanent Conservation Orders as a means for protecting items with State significance.

A permit under Section 60 of the *Heritage Act 1977* is required for works on a site listed on the SHR, except for that work which complies with the conditions for exemptions to the requirement for obtaining a permit. Details of which minor works are exempted from the requirements to submit a Section 60 Application can be found in the Guideline 'Standard Exemptions for Works requiring Heritage Council Approval'. These exemptions came into force on 5 September 2008 and replace all previous exemptions.

The site **is not** included on the State Heritage Register under the *Heritage Act 1977* (NSW) (the Act) (refer to Figure 3).

2.2.3.2 Archaeological Relics

Section 139 of the *Heritage Act 1977* protects archaeological 'relics' from being 'exposed, moved, damaged or destroyed' by the disturbance or excavation of land. This protection extends to the situation where a person has 'reasonable cause to suspect' that archaeological remains may be affected by the disturbance or excavation of the land. This section applies to all land in NSW that is not included on the SHR.

Under Section 41(1) of the *Heritage Act* and the *Heritage Amendment Act 2009* (No. 34) 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 significance.*

It should be noted that not all remains that would be considered archaeological are relics under the *NSW Heritage Act 1977*. Advice given in the *Archaeological Significance Assessment Guideline* is that a 'relic' would be viewed as a chattel, and it is stated that:

In practice, an important historical archaeological site will be likely to contain a range of different elements as vestiges and remnants of the past. Such sites will include 'relics' of significance in the form of deposits, artefacts, objects and usually also other material evidence from demolished buildings, works or former structures which provide evidence of prior occupations but may not be "relics".

If a relic, including shipwrecks in NSW waters (that is rivers, harbours, lakes and enclosed bays) is located, the discoverer is required to notify the Heritage Council of NSW.

Section 139 of the *Heritage Act 1977* requires any person who knows or has reasonable cause to suspect that their proposed works will expose or disturb a 'relic' to first obtain an Excavation Permit from the Heritage Council of NSW (pursuant to Section 140 of the Act), unless there is an applicable exception (pursuant to Section 139(4)). Excavation permits are issued by the Heritage Council of NSW

in accordance with sections 60 or 140 of the *Heritage Act 1977*. It is an offence to disturb or excavate land to discover, expose or move a relic without obtaining a permit. Excavation permits are usually issued subject to a range of conditions. These conditions will relate to matters such as reporting requirements and artefact cataloguing, storage and curation.

Exceptions under Section 139(4) to the standard Section 140 process exist for applications that meet the appropriate criterion. An application is still required to be made. The Section 139(4) permit is an exception from the requirement to obtain a Section 140 permit and reflects the nature of the impact and the significance of the relics or potential relics being impacted upon.

If an exception has been granted and, during the course of the development, substantial intact archaeological relics of state or local significance, not identified in the archaeological assessment or statement required by this exception, are unexpectedly discovered during excavation, work must cease in the affected area and the Heritage Office must be notified in writing in accordance with section 146 of the *Heritage Act 1977*. Depending on the nature of the discovery, additional assessment and, possibly, an excavation permit may be required prior to the recommencement of excavation in the affected area.

2.2.3.3 S.170 Register

Section 170 of the Heritage Act requires government agencies to keep a Register of heritage items, which is called a Heritage and Conservation Register or more commonly, a s170 Register. A s170 Register is a record of the heritage assets owned or managed by a NSW government agency.

The site **is not** included on the Department of Education's State Agency Heritage and Conservation Register.

2.3 Non-Statutory Listings

2.3.1 Register of the National Estate

The Register of the National Estate (RNE) was closed in 2007 and is no longer a statutory list.

The RNE is maintained on a non-statutory basis as a publicly available archive and educational resource.

Items entered in the RNE prior to its closure in 2007 as identified as "registered". The existence of an entry for a place in the RNE does not in itself create a requirement to protect the place under Commonwealth law. Nevertheless, information in the register may continue to be current and may be relevant to statutory decisions about protection.

The site **is not** listed on the National Trust (NSW) Register.

2.3.2 National Trust of Australia (NSW) Register

The National Trust of Australia (NSW) is a community-based organisation with independently constituted Trusts in each state and territory. The NSW National Trust compiles a heritage list primarily of historic places, but they also include some Aboriginal and natural places. Listing helps to provide recognition and promote public appreciation and concern for local heritage.

The National Trust Register has no legal foundation or statutory power but is recognised as an authoritative statement on the significance to the community of particular items and is held in high esteem by the public.

The site **is not** listed on the National Trust (NSW) Register.

2.4 Heritage in the Vicinity

There are no heritage items listed on the SHR or SHI within 200m of the site (refer to Figure 3).



Parramatta Historical Archaeological Landscape Management Study

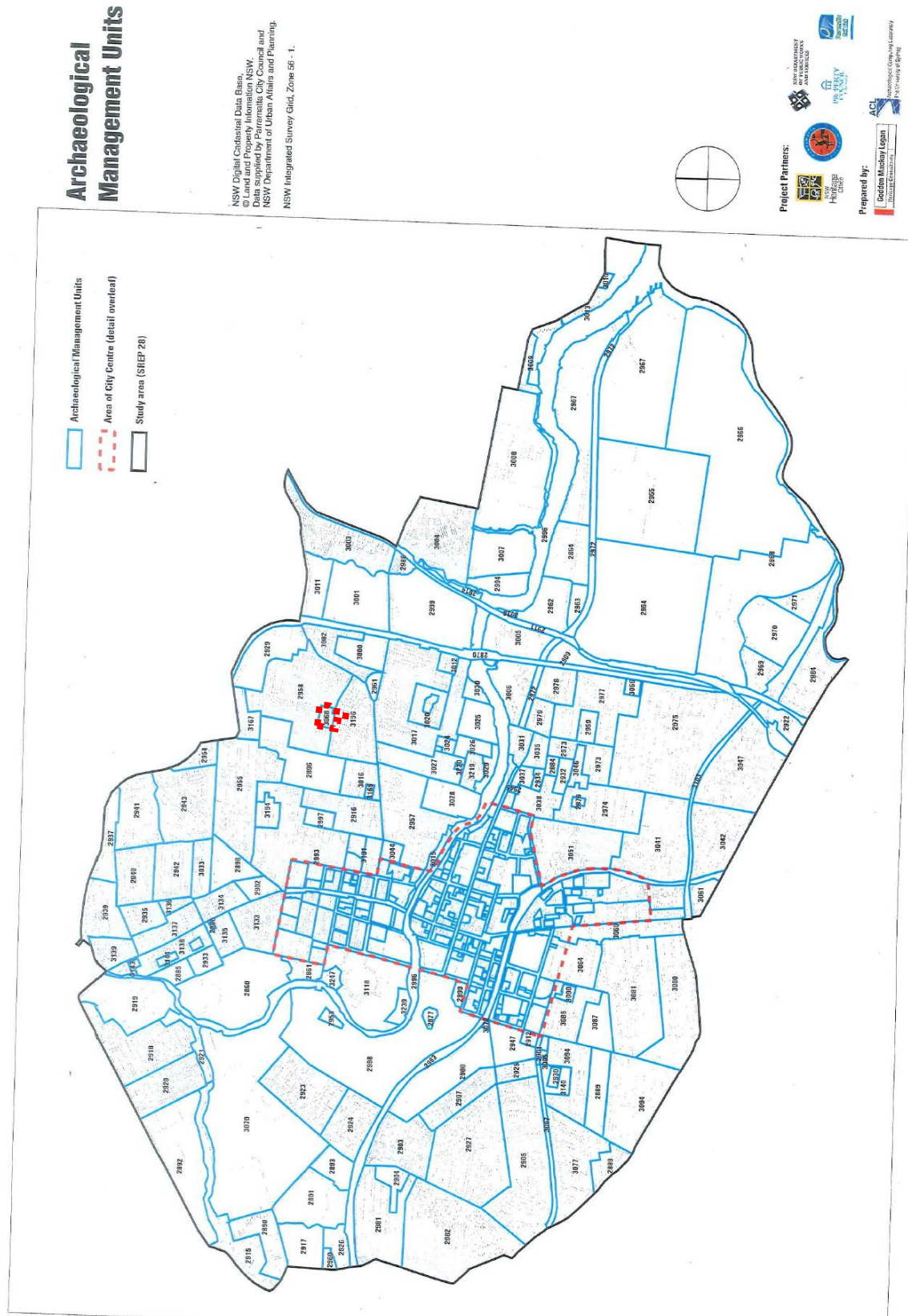


Figure 4: PHALMS Archaeological Management Units with the site outlined in red (source: Godden Mackay Logan (2000b))

3 HISTORICAL CONTEXT

3.1 Early History (1790s-1810s)

Land on the northern bank of the Parramatta River (south of the site) was granted in two 60-acre farms by Governor Phillip to settlers “from the Sirius”. According to the 1791 map of the settlement in Parramatta (at the time referred to as Rose Hill) (refer to Figure 5), the site is in the northwestern corner of Town Boundary Farm No. 7, a 60 acre grant to William Reid, with Town Boundary Farm No. 6 which was owned by Robert Webb to the east (GML, 2013, p. 13) (refer to Figure 6). Watkin Tench (1793) visited Robert Webb in 1790, and described his farm thus:

He has received great encouragement and assistance from the governor. He has five acres cleared and planted with maize, which looks thriving, and promises to yield a decent crop. His house and a small one adjoining for pigs and poultry were built for him by the governor, who also gave him two sows and seven fowls, to which he adds a little stock of his own acquiring

Assistance from the governor included the provision of huts, land clearing, food, seed, agricultural tools, livestock, medical attention and convict labour (GML, 2013, p. 13).



Figure 5: Detail of site (outlined) from c1791 map showing the towns of Parramatta and settlements of Rose Hill, Field of Mars and Toongabbie (source: Godden Mackay Logan (2000b))

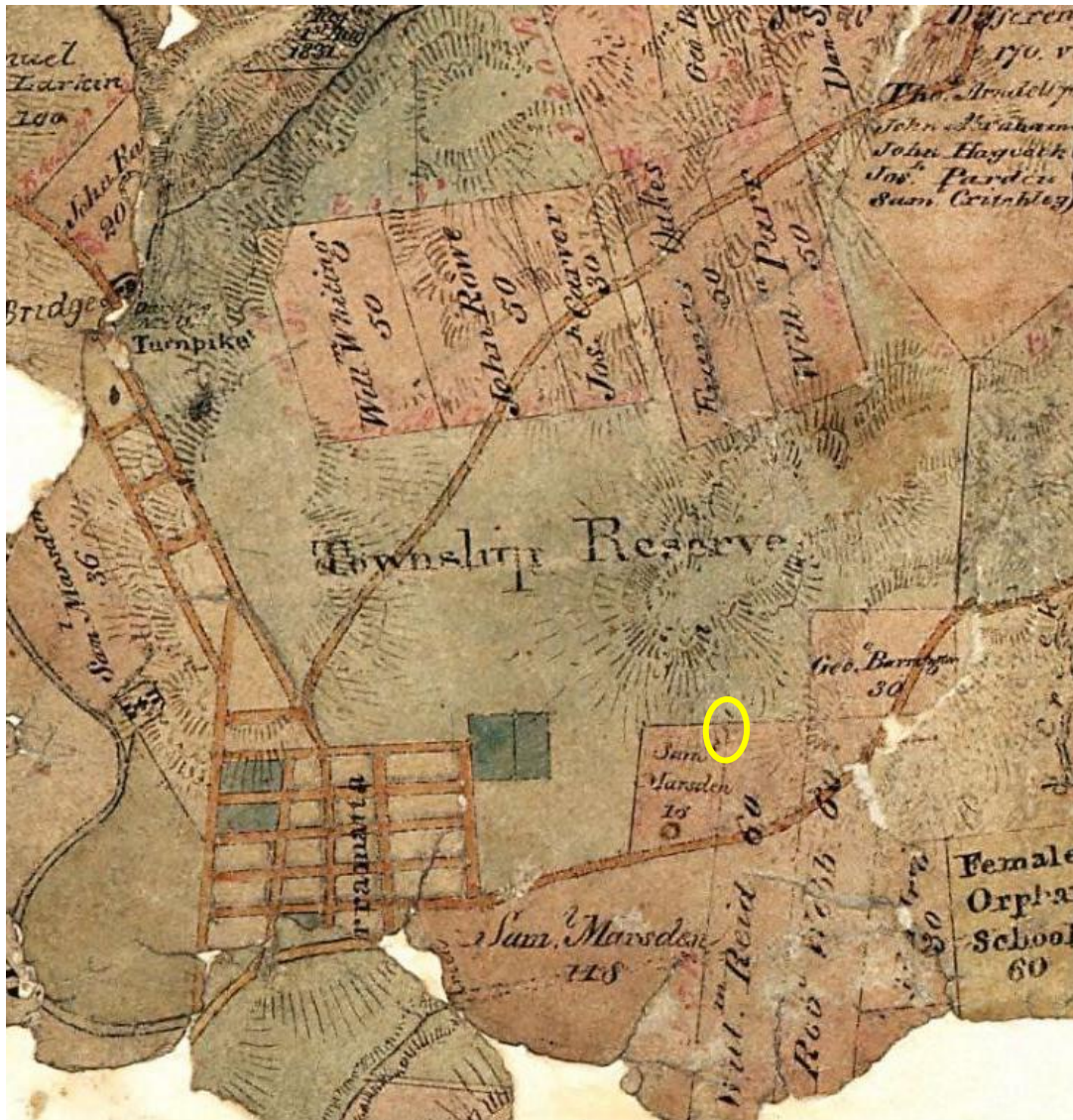


Figure 6: Field of Mars Parish map (n.d.) (source: Land and Property Information, Historical Land Records Viewer). Approximate location of the site is circled in yellow

3.2 Township Reserve

Settlement on the northern banks of the Parramatta River was started by soldier and emancipist settlers on small holdings (Walker, 1993). Contemporary historical plans and texts indicate that the initial focus of land development was on the south side of the river, with activity on the northern side largely restricted to farming (AHMS, 2006, p. 9). After 1823, new settlement in the area focussed on North Parramatta, where it was restricted along the river and east from Sorrell Street by existing grants to the military, and north-west by Governor Bligh's 105-acre grant (AHMS, 2006, p. 11).

Prior to the 1840s, the population of Parramatta was dominated by convict servants, tradesmen, and emancipists, many of whom had originally been assigned to Parramatta as convicts. By the 1840s, the town's demography was changing, with more free settlers, and the number of people born in NSW was increasing (AHMS, 2006, p. 11). By 1846, there was little development north of Fennell Street, apart from along Church Street. Building continued steadily from the 1860s to the 1880s. The 1880s was the most intensive period of development. The economic confidence of the time encouraged speculative builders and landowners to construct houses. By 1895, when the area was surveyed for

the sewerage system, a relatively dense pattern of houses had developed, with only a few pieces of vacant land west of Church Street (Parramatta City Council, 2011, pp. 4.4 - 36).

3.3 Reverend Samuel Marsden's Land Grant

Historic parish maps (see Figure 6 and Figure 8) show that the site extends into the 18 acres granted to Reverend Samuel Marsden.

On 1 November 1822, Samuel Marsden was formally granted 112 acres to the south of the site, bounded on the east by Reid's farm, 39 chains, on the north by the Field of Mars Road [Victoria Road], 27 chains 20 links and 21 chains, on the west by a small creek, and on the south by Parramatta River (GML, 2013, p. 15). Marsden continued to reside within the township on the southern side of the river, using his new land for agriculture (AHMS, 2006, p. 9).

Reverend Samuel Marsden was the principal Anglican clergyman in New South Wales from the 1790s to the 1820s. He was a substantial landowner, who was heavily involved in promoting the Christian religion and served on many local committees promoting a more sober and industrious lifestyle. He also served as a magistrate. He was also involved in bringing Christianity to New Zealand and establishing missions (GML, 2013, pp. 13-14).

Samuel Marsden died on 12 May 1838 (GML, 2013, p. 17; Yarwood & Douglas, 1994, p. 6). In his will, he left the land at Parramatta known as Newlands to his trustees to sell. He made no other devises or gifts of that land. It was willed to his executors in one parcel (GML, 2013, p. 17).

In his will of 18 October 1836 Samuel Marsden left:

*All that my estate or farm called Newlands situate on the banks of the Parramatta River and containing by estimation - acres or thereabouts I give and devise the same to the said John Campbell, Hannibal Macarthur and William Macarthur their heirs and assigns Upon Trust that they said John Campbell, Hannibal Macarthur and William Macarthur and the survivor or survivors of these and the heirs executors or administrators of such survivor do and shall as soon as conveniently may be after my decease sell and absolutely dispose of the same either together or in parcels and either by public auction or private contract as they or he shall think best.*⁴²

Marsden had not given away or transferred any of the Newlands property except by sale. From the time he arrived in the colony until his death, no gift or transfer of this land was registered in either the 'Old Registers' or the Old System deeds at LPI. The Search Notes for the title to his Newlands Estate undertaken by the LPI's title searchers for the first conversion of any land of his Newlands Estate in 1881 reveal no gifts or transfers except by sale. In addition, his will made no mention of any devise or gift of his Newlands Estate (GML, 2013, p. 17).

An auction of Marsden's Newlands Estate by James Byrnes was held at the Red Cow Inn in Parramatta on 31 October 1839. Surveyor John Armstrong laid out the subdivision of Newlands (GML, 2013, p. 17). A copy of that subdivision plan made by P L Bemis survives and shows the subdivision of Newlands Estate (see Figure 7).

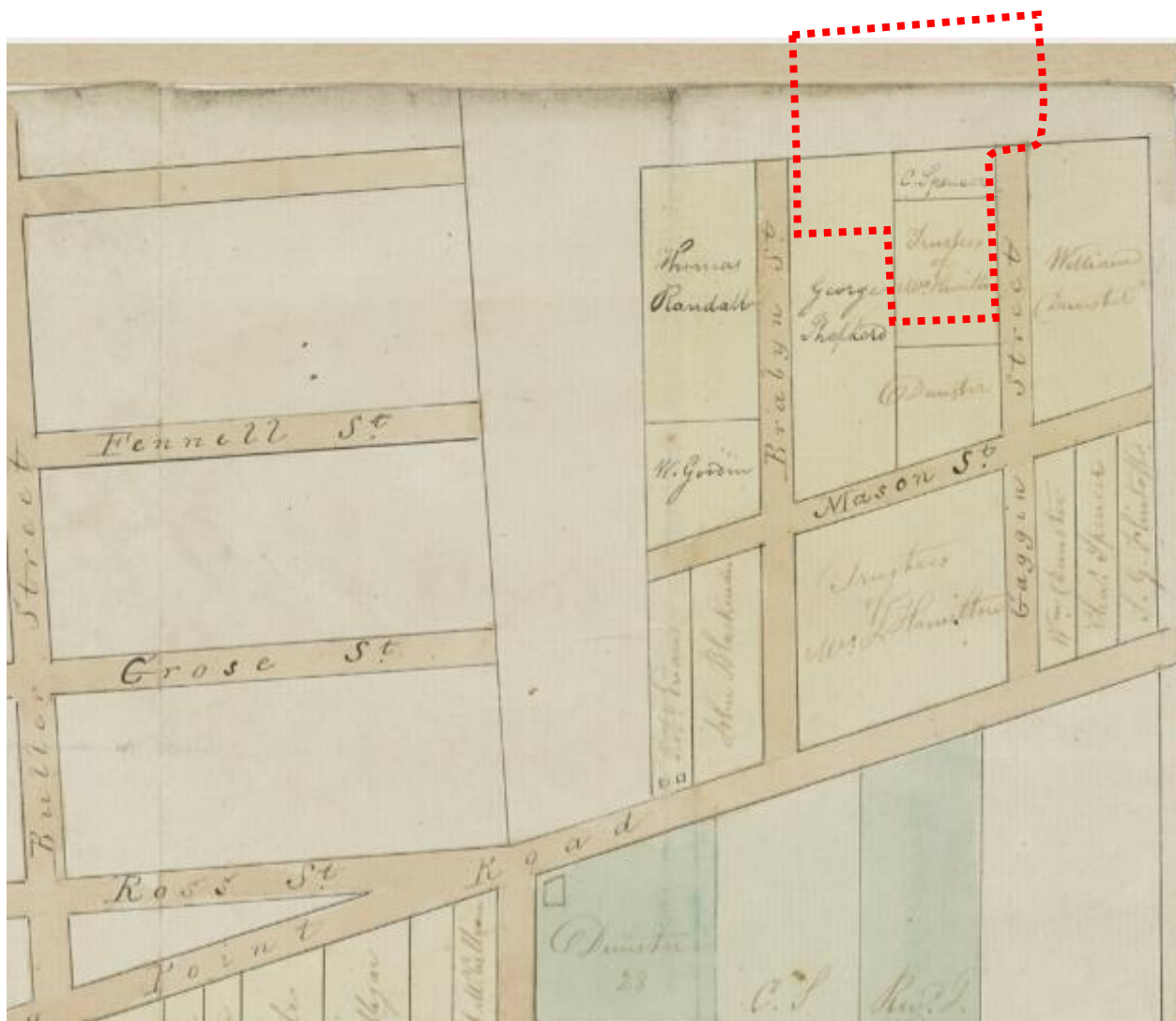


Figure 7: Plan of the late Rev. Samuel Marsden's estate as subdivided (Bemi, c. 1840) (source: State Library NSW, Z/M2 811.1312/1840/1 , M2 811.1312/1840/1). Approximate location of the site outlined.

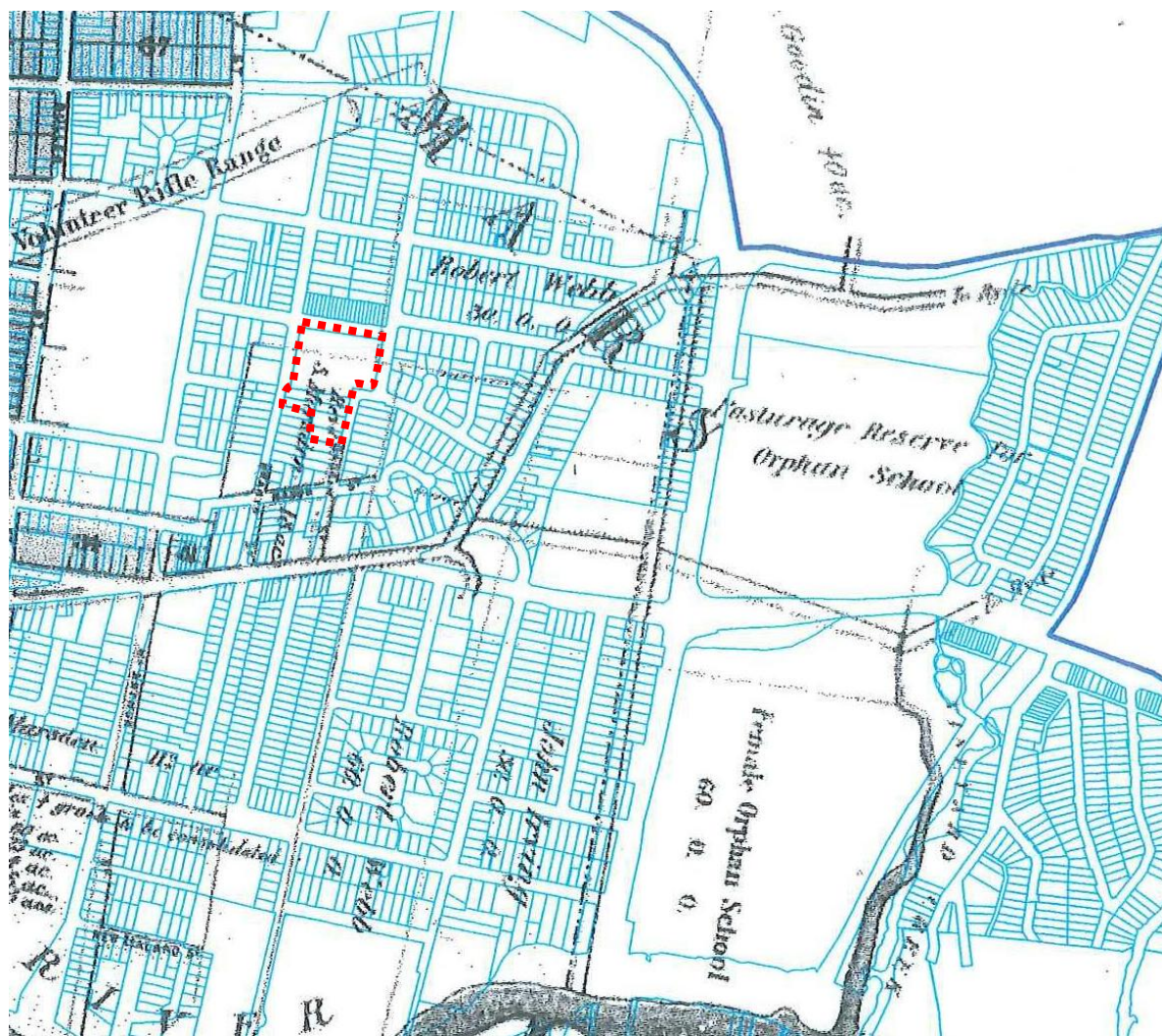


Figure 8: Detail of site (outlined) from c.1871 plan of the environs of Parramatta, County of Cumberland (source: Godden Mackay Logan (2000b). Note that the map shows the earlier boundary of Rev. Marsden's 18 acre grant

3.4 History of the Site

The site incorporates some of the land that was granted to Reverend Samuel Marsden in 1822 (refer to Section 3.3). After Marsden's death in 1838, the land was subdivided. The southern portions of the site were purchased by C. Spencer, Trustees of William Hamilton, and George Shephard (refer to Figure 7). The northern portion of the site, which was the original land purchase for the school was owned by Patrick Hayes (refer to Figure 9 and Figure 10).

According to an article in the 23rd August 1944 edition of *The Cumberland Argus and Fruitgrowers Advocate*, the site of East Parramatta had been purchased (*The Cumberland Argus and Fruitgrowers Advocate*, 1944b, p. 1). While the plan for the school was prepared in the mid-1920s, construction of the school was pushed back until after WWII (*The Cumberland Argus and Fruitgrowers Advocate*, 1938, p. 5; 1944a, p. 11) (refer to Figure 9). It should be noted that, while there are references to a "Parramatta East Public School" published as early as 1887, these references pertain to the Granville North Public School. Granville North Public School was, in its early stages, named "Parramatta East Public School"; however displeasure from the local Granville community regarding the suitability of that name caused the change (*The Cumberland Mercury*, 1887).

The first classroom at Parramatta East Public School (originally referred to as East Parramatta School) was opened in May 1949 (The Cumberland Argus and Fruitgrowers Advocate, 1949, p. 5).



Figure 9: Parish Field of Mars, County of Cumberland Sheet 2 (c.1910) (source: HLRV). Approximate location of the site is outlined in red

A tender request from the Department of Public Works for the "provision of improved toilet and abolition facilities" for the school was posted in the *Sydney Morning Herald* in September 1953 (Sydney Morning Herald, 1953, p. 16). In May the following year, there is a reference in the *Sydney Morning Herald* to the Department of Public Works inviting tenders for "Parramatta East: Supply and erection of double timber building" (Sydney Morning Herald, 1954, p. 22).

After WWII, education in New South Wales grew across all the State, Catholic and Private school sectors. This period saw major secondary and primary school expanded in the 1940's and 1950's. In Parramatta, this meant the opening of new schools and the re-invigoration of some of its older schools. The development of the Parramatta East Public School was part of this post-war push.

Figure 10 and historic aerial photographs indicates that land was progressively purchased and added in order to expand the school from the 1950s through to the late 1970s, until sometime in the 1980s when the current configuration was achieved.

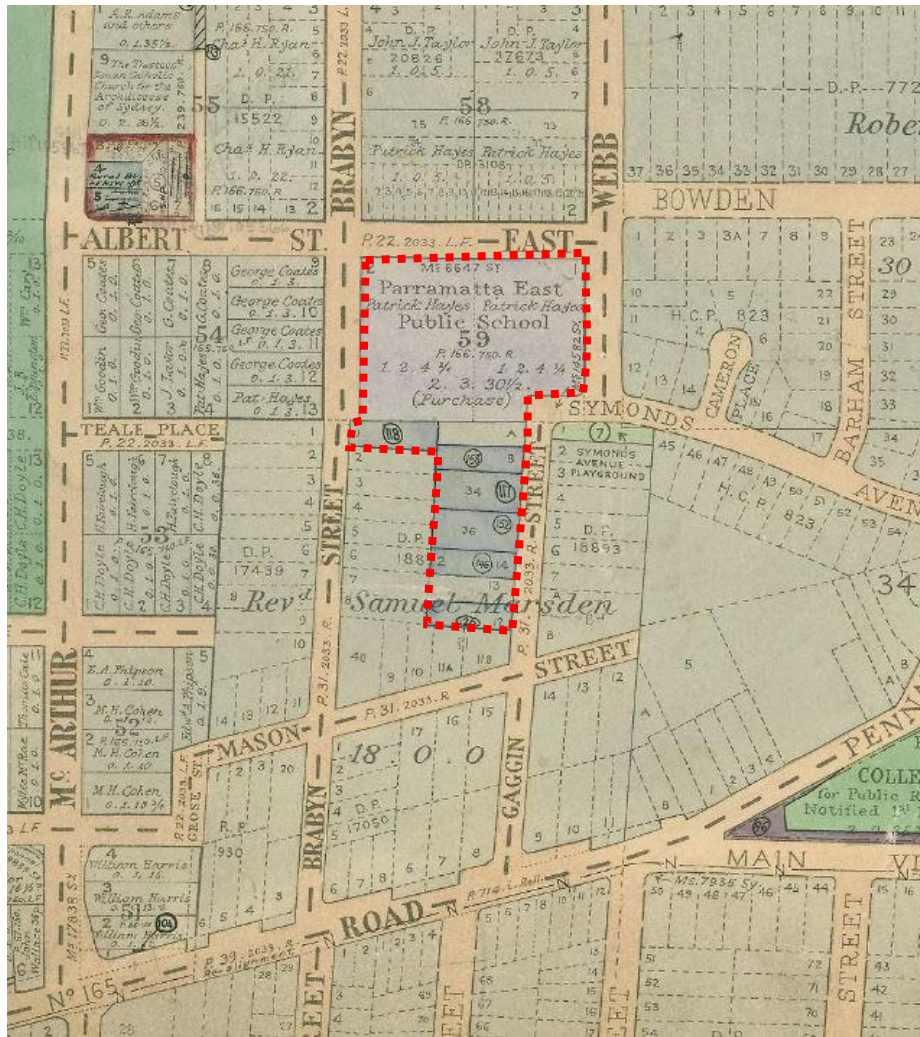


Figure 10: Map of Parramatta c.1961 (source: HLRV). Location of the site is outlined in red

Historical aerials and satellite images of the site dating 1930-2017 were reviewed as part of preparing this PHA (see Figure 11 to Figure 21). These aerials provide a summary of development at the site and within the surrounding area (refer to Table 2).

Date	Description
1930	The earliest aerial photograph displays an undeveloped site with residential development to the south. The current street layout is mostly present; the alignment of Webb Street is within the site.
1943	This aerial photograph shows the site as still being mostly undeveloped. Four (4) residential properties have been established in the southern portion of the site. The residential development surrounding the site has increased.
1951	This aerial image shows that the first of the existing school buildings (Blocks D and E) have been established. There are several small structures to the south of Blocks D and E. In the southern portion of the site, six (6) residential dwellings have been established.
1955	This aerial photograph shows that the existing layout of the campus begins to be formed. Block G has been constructed behind Block F. There are four (4) structures in the middle campus. There have been no changes to the residential properties in the southern portion of the site.
1965	The site appears relatively unchanged from the 1955 aerial.
1978	This aerial photograph shows the building between Block C and D has been demolished and that Block C has been extended westward. Block H has been constructed. A hardstand play area immediately south of the northern school buildings has been established. The two residential dwellings to the south of Block H had been demolished. The third dwelling down on the eastern side of the site has also been demolished.
1986	In this aerial photograph, all the residential dwellings in the site have been demolished.
1996	The site appears relatively unchanged from the 1986 aerial.
2005	In this aerial photograph the structures to the two structures furthest east of Block G appear to have been demolished. There has been a north-south extension has been established at the eastern end of Block A. A structure has been constructed at the eastern end of the hardstand play area. It appears that there could be a demountable building to the south of Block H.
2009	In this aerial photograph, a landscaped play area has been established between the Block A extension and the sheltered play area. Two (2) buildings at the southern end of the Block A have been established. An additional, two (2) buildings have been established south of the landscaped play area. Block Q (Hall) is being constructed to south of the covered and uncovered play areas. The grassed playground at the southern end of the campus appears unchanged.
2017	In this aerial photograph, Block Q has been constructed. There are three (3) rows of demountable buildings (totalling 8) to the south of Block J, with an uncovered concrete path connecting the buildings. A demountable building has been established between Blocks F and G. The grassed playground at the southern end of the campus appears unchanged.

Table 2: Summary of Historic Aerial Photographs



Figure 11: 1930 aerial photograph (source: Historical Aerial Photography – Foundation Spatial Data).
Approximate location of the site is outlined in red



Figure 12: 1943 aerial photograph (source: Historical Imagery Viewer). The site is outlined in red



Figure 13: 1951 aerial photograph (source: Historical Imagery Viewer). The site is outlined in red



Figure 14: 1955 aerial photograph (source: Historical Imagery Viewer). The site is outlined in red



Figure 15: 1965 aerial photograph (source: Historical Imagery Viewer). The site is outlined in red



Figure 16: 1978 aerial photograph (source: Historical Imagery Viewer). The site is outlined in red



Figure 17: 1986 aerial photograph (source: Historical Imagery Viewer). The site is outlined in red



Figure 18: 1996 aerial photograph (source: Historical Imagery Viewer). The site is outlined in red



Figure 19: 2005 aerial photograph (source: Historical Imagery Viewer). The site is outlined in red



Figure 20: 2009 aerial photograph (source: Nearmap). The site is outlined in red



Figure 21: 2017 aerial photograph (source: Nearmap). The site is outlined in red

4 PHYSICAL DESCRIPTION

Kayandel carried out a physical assessment of Parramatta East Public School and surrounds on the 28th September 2022. The assessment involved an investigation into the built form and landscape setting. The physical description is limited to the exterior of the buildings. It does not provide a detailed investigation of all fabric but an overview of the elements of the place to assist in determining significance.

4.1 Site Layout

The primary entrance to Parramatta East Public School is via Albert Street E with additional entrance on Brabyn and Webb Streets. The education institutional buildings are situated in the middle to northern parts of the campus, with a hardstand basketball court in the centre. The buildings at the northern end of the campus comprises a collection of closely spaced 1950s to 1970s education institutional buildings, with additional demountable buildings added to the central western part of the site. The buildings are connected by a series of uncovered and covered concrete paths.

The topography of the site gently slopes to the south/southeast. Open grounds are immediately located at the northern and southern end of the school complex. The trees at the northern end of the campus were planted between 1955 and 1965 (see Figure 14 and Figure 15). The majority of the trees at the southern end of the campus were planted post 1951 (see Figure 12 and Figure 13). The tree at the northeastern corner of Block H appears to have been planted between 1965 and 1978 (see Figure 15 and Figure 16).



Plate 1: General view of the playground at the northern end of the campus



Plate 2: View of the Large COLA



Plate 3: View of across the hardstand play area and COLA



Plate 4: View along uncovered path towards northern buildings



Plate 5: View towards the northern end of the Hall



Plate 6: The school vegetable gardens



Plate 7: General view of the built playground area



Plate 8: General view of the playground looking towards the school buildings



Plate 9: Looking east along covered walkway



Plate 10: Example of GSV in the playground



Plate 11: Example of the change in GSV between high traffic areas and the rest of the playground



Plate 12: Installed play equipment



Plate 13: Mature planting at the northeastern corner of Block H



Plate 14: Closeup of mature planting at the northeastern corner of Block H

4.2 Built Structures

Parramatta East School comprises structures that date from c.1940 to 2019. These structures have been grouped in according to their period of construction as known from historical aerial imagery and documentary sources.

4.2.1 The c. 1950s Classrooms

From the aerial photographs and site inspection it is evident that at least six of the original buildings survives on the site. During the site inspection, two different styles were identified: Blocks D and E; and Blocks A, B, C, F and G. It is considered likely that Blocks D and E represent an earlier phase of construction during the late 1940s and early/mid 1950s.

Blocks D and E originally each contained two classrooms (and still do), which opened off a long north facing verandah. They are of timber-framed construction, with a suspended timber floors on brick piers with a ventilated subfloor space (see Plate 15 to Plate 22).

The northern elevation of Block D is clad in a combination of sheet fibro, and kliplok sheeting. The rest of the building is clad in kliplok sheeting (see Plate 15 and Plate 16). The verandah for Block D is a skillion, and partly enclosed (see Plate 15 and Plate 17), while Block E is clad in kliplok sheeting (refer to Plate 19 and Plate 21). Block E has an open front verandah, with storage rooms at either end (see Plate 20).

Blocks A, B and F are of brick construction. The buildings are on piers with an enclosed subfloor. These blocks each have fully enclosed verandahs, which is internally clad with weatherboard and fibro board (refer to Plate 25 and Plate 42). Block A is being utilised as the library. The extension to the rear at the building, is modern in design (see Plate 27). Blocks B and F each have two classrooms which open off the verandah.

Block C is a brick construction. It has a south facing verandah (refer to Plate 31, Plate 35 and Plate 36).

Block G has been constructed with brick, with the northern elevation clad in weatherboard (see Plate 43 and Plate 44). The building is on piers with an enclosed subfloor. It has two classrooms, which are opened off a long verandah. On the verandah, timber seats are fixed to the wall. These appear to be an early feature which has been conserved. The verandah balustrades comprise timber posts and rails.

All the buildings have a gable roofs. In most cases the roofs are clad with sheet metal, although Block C has a tiled roof (refer to Plate 31). Most of the buildings appear to have been built to the same standard design and feature pairs of double hung timber windows and boarded doors with highlight sashes above.

It does appear that the buildings have undergone minimal external alteration, except for the rear extension to Block A, however review of the original drawings would be required in order to confirm this assessment. It is not clear whether the internal linings are original, although there is no evidence of the original blackboards, indicating that the linings may have been replaced. In addition, the fitouts have been updated to meet the changing requirements of the educational programs taught. Despite these modifications, the buildings form a cohesive group, which retains much of its original character and is representative of the type of school development that occurred across the state in the mid-1950s.



Plate 15: Northern façade of Block D



Plate 16: Southern façade of Block D



Plate 17: View of the western end of Block D's verandah



Plate 18: Looking between Block D (left) and Block E (right)



Plate 19: Northern elevation of Block E



Plate 20: Looking along the Block E verandah



Plate 21: Southern façade of Block E



Plate 22: Looking towards the southern façade of Blocks D (right) and E (middle)



Plate 23: View of Block A



Plate 24: Eastern elevation of Block A



Plate 25: Exterior wall of Block A inside enclosed verandah

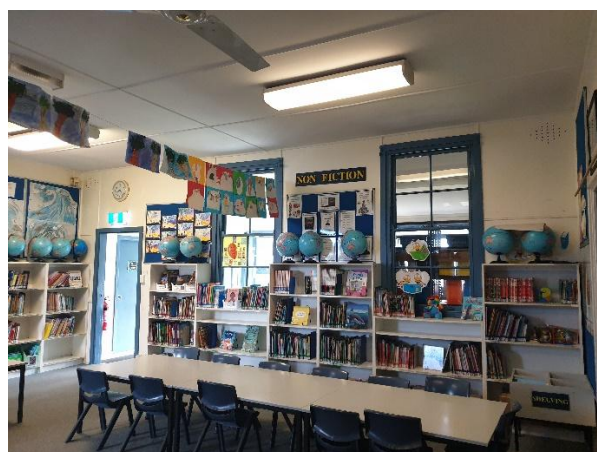


Plate 26: Example of interior wall in Block A



Plate 27: View towards the extension in Block A



Plate 28: View of Block B



Plate 29: Block B northern facade



Plate 30: Looking towards southern elevation of Block B



Plate 31: Northern elevation of Block C



Plate 32: Side steps to access the rear verandah



Plate 33: Close up of Block C northern façade – eastern end



Plate 34: Close up of Block C northern façade – western end



Plate 35: Block C southern façade – western end



Plate 36: Block C southern façade – eastern end



Plate 37: Example of section of Block C

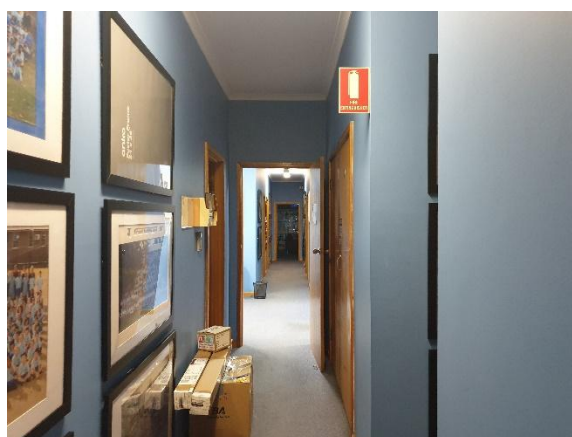


Plate 38: View along the corridor of Block C



Plate 39: View of workspace in Block C



Plate 40: View of Block F



Plate 41: Close up of the northern façade of Block F – eastern end



Plate 42: View of the enclosed verandah in Block F



Plate 43: Block G open verandah



Plate 44: View under Block G verandah



Plate 45: Example of internal windows in Block G



Plate 46: General view from inside Block G

4.2.2 The c. 1970s Buildings

Block H has been constructed in a style consistent with Block G, constructed with brick and clad with weatherboard along the northern elevation. It also features an open verandah on the northern elevation, and pairs of double hung timber windows and boarded doors with highlight sashes above. Overall, Block H compliments the earlier buildings, and the 1950s school design and construction.

Block J is a single storey brick building. It has a hipped roof, clad with sheet metal.



Plate 47: Looking towards Block H



Plate 48: General view of Block H open verandah



Plate 49: Block H open verandah



Plate 50: Looking towards Block H from Brabyn St



Plate 51: Rear of Block H



Plate 52: Looking towards the rear of Block H from Brabyn St



Plate 53: Block J



Plate 54: Eastern end of Block J

4.2.3 Demountable buildings (c. 2009-2019)

The collection of demountable buildings, located in the southwest and southeast of the campus, date between 2009 and 2019. They are simple, prefabricated metal structures built atop brick piers. They are accessed via an external metal stairs and ramps and are connected by a mixture of covered and uncovered concrete paths.

The demountable buildings are considered to be in good condition.



Plate 55: View east between the demountables



Plate 56: View west between the demountables



Plate 57: View of demountable classroom



Plate 58: View of demountable classroom in the south-eastern campus of the campus



Plate 59: Looking west between demountable buildings



Plate 60: View from Brabyn Street of demountable building between Blocks F and G



Plate 61: View from Brabyn Street of demountable buildings

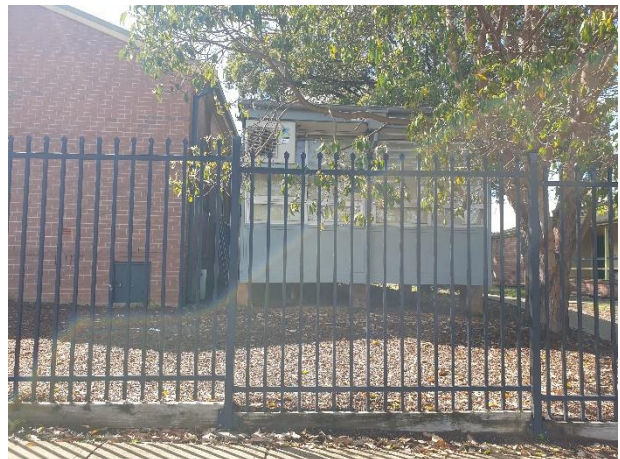


Plate 62: View from Brabyn Street of demountable building to the rear of Block G

4.3 Settings and Views

The site is an operational primary school within Parramatta East's residential landscape. The property is bounded by Albert Street E to the north, Brabyn Street to the west, Gaggin/Webb Streets to the east and residential development immediately south. The area surrounding the school is

characterised by early twentieth to twenty-first century low density residential development with discrete areas of medium density.

The buildings at the very northern end of the campus are orientated towards Albert Street E, with their primary views towards the street. Blocks G and H are orientated north, in the direction of Albert Street E. The view for Block G is obscured by Block F, while the view from Block H is obscured by Block G.

On the western side of the campus, Blocks G and H, and the demountable buildings obstruct views from Brabyn Street across the campus. Views are further shielded by the tall palisade fence surrounding the site.

4.4 Features

Outside of the Parramatta East Public School ground, at the corner of Brabyn St and Albert St E, a possible section of a sandstone marker was identified (refer to Plate 63 and Plate 64).



Plate 63: Remains of a possible sandstone marker at the corner of Brabyn St and Albert St E

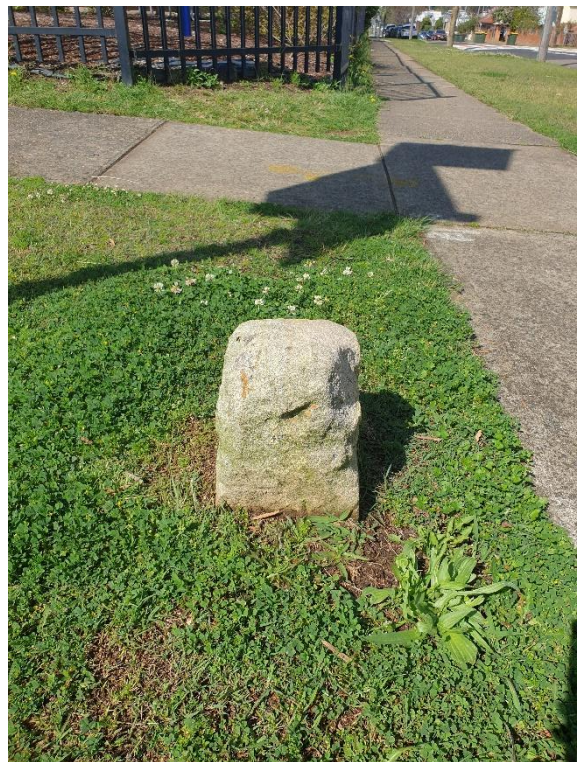


Plate 64: Closeup of the possible sandstone marker

4.5 Archaeological Potential

Archaeological research potential refers to the ability of archaeological evidence to provide information about a heritage item or archaeological site that could not be derived from any other source, and which contributes to the archaeological significance of that site. Archaeological research potential differs from archaeological potential in that the presence of an archaeological resource (i.e., archaeological potential) does not mean that it can provide any additional information that increases our understanding of a site or the past (i.e., archaeological research potential).

The research potential of a site is also affected by the integrity of the archaeological resource within a heritage item or archaeological site. If a heritage item or archaeological site is disturbed, then

vital contextual information that links material evidence to a stratigraphic sequence may be missing and it may be impossible to relate material evidence to activities on a site. This is generally held to reduce the ability of an archaeological site to answer research questions. Assessment of the research potential of a heritage item or archaeological site also relates to the level of existing documentation of a site and of the nature of the research done so far (the research framework), to produce a 'knowledge' pool to which research into archaeological remains can add.

4.5.1 Integrity of sub-surface/subfloor deposits

Sub-surface/sub-floor deposits can be disturbed or damaged by later development or taphonomic processes. The integrity of the sub-surface/subfloor deposits (archaeological potential) does not equate to archaeological research potential (the ability of the deposits to address research questions), or archaeological significance (the ability of the archaeological resource to address significance assessment criteria).

During the inspection of the southern playing field, remains of the former residential dwellings and associated gardens, established between the 1940s and the late 1970s (refer to Figure 12 to Figure 16), including brick foundations and sections of clay pipes were observed (refer to Plate 65 to Plate 70). This indicates that while the demolition has occurred as part of extending the school grounds to expand the playing field, there was likely to have been minimal ground disturbance as part of these works.

The integrity of any sub-surface deposits that could be present in the northern portion of the site will be impacted by the earthworks undertaken as part of establishing the hardstand surfaces, trenching for the establishment of services and earthworks for the establishment of building foundations.

Blocks D and E have suspended timber floors on brick piers with a ventilated subfloor space; at the time of the site inspection, the floor coverings were vinyl tiles and carpet. Depending on whether there has always been some type of floor covering, and if not, the type of flooring underneath, there is potential that subfloor deposits may have accumulated. Any subfloor deposits that may have accumulated under Blocks D and E would have been associated with everyday use of the buildings. However, the subfloor space is exposed to the elements, and any subfloor deposits that may have accumulated are likely to have been washed away during rain events.

Blocks A, B, C, F, G, and H are on piers with an enclosed subfloor, and like Blocks D and E, the floor coverings were vinyl tiles and carpet. Depending on whether there has always been some type of floor covering, and if not, the type of flooring underneath, there is potential that subfloor deposits may have accumulated. Any subfloor deposits that may have accumulated under Blocks D and E would have been associated with everyday use of the buildings.



Plate 65: Remains of clay pipes



Plate 66: Remains of brick foundations



Plate 67: Remains of brick foundations (front) and concrete slab (middle)



Plate 68: Remains of former residential structures



Plate 69: Remains of former residential garden



Plate 70: Section of concrete garden retaining wall

4.5.2 Research Potential

Archaeological research potential refers to the ability of archaeological evidence to provide information about a site that could not be derived from any other source, and which contributes to

the archaeological significance of that site. Archaeological research potential differs from archaeological potential in that the presence of an archaeological resource (i.e. archaeological potential) does not mean that it can provide any additional information that increases our understanding of a site or the past (i.e. archaeological research potential).

The research potential of a site is also affected by the integrity of the archaeological resource within a site. If a site is disturbed, then vital contextual information that links material evidence to a stratigraphic sequence may be missing and it may be impossible to relate material evidence to activities on a site. This is generally held to reduce the ability of an archaeological site to answer research questions. Assessment of the research potential of a site also relates to the level of existing documentation of a site and of the nature of the research done so far (the research framework), to produce a 'knowledge' pool to which research into archaeological remains can add.

The PHALMS Archaeological Research Potential assessment of the site identified that the northern portion had little potential, while the southern portion, the play fields had moderate potential (refer to Figure 22). However, review of the research potential for PHALMS Unit 3068 (the northern portion of the site) has identified that the assessment in Figure 22 is inconsistent with the assessment of moderate archaeological research potential detailed in the State Heritage Inventory entry for the item (refer to Section 5.3).

In terms of research potential, the site's history suggests that any archaeological material present will vary as different parts of the site had different uses. While the site extends through the northwestern corner of the former Town Boundary Farm No. 7, which is from the early phase of settlement in the Parramatta (refer to Figure 5 and Figure 6), these maps do not indicate the presence of any built structures. Any archaeological remains associated with former Town Boundary Farm No. 7 would most likely be associated with the property boundaries and evidence of early farming practices dating from the late 18th century. Examples of these types of remains are also well documented elsewhere, such as in Parramatta Park.

The current flooring of the Blocks D, E, A, B, C, F, G, and H are a mixture of lino and carpet, these types of flooring will have reduced the amount of subfloor deposit that would normally accumulate under uncovered floors post their installation. Any archaeological remains associated with these buildings will most likely consist of day-to-day items discarded by users. It is unlikely that any of this material would contribute to any further knowledge about the use of the buildings.

Archaeological remains associated with the former mid-twentieth century residential dwellings in the southern portion of the site will most likely consist of footings or foundations, structural postholes, cut and fill deposits, and garden edging. These types of remains are also well documented elsewhere and is unlikely to contribute to any further knowledge about the site.

Parramatta Historical Archaeological Landscape Management Study

Archaeological
Research Potential

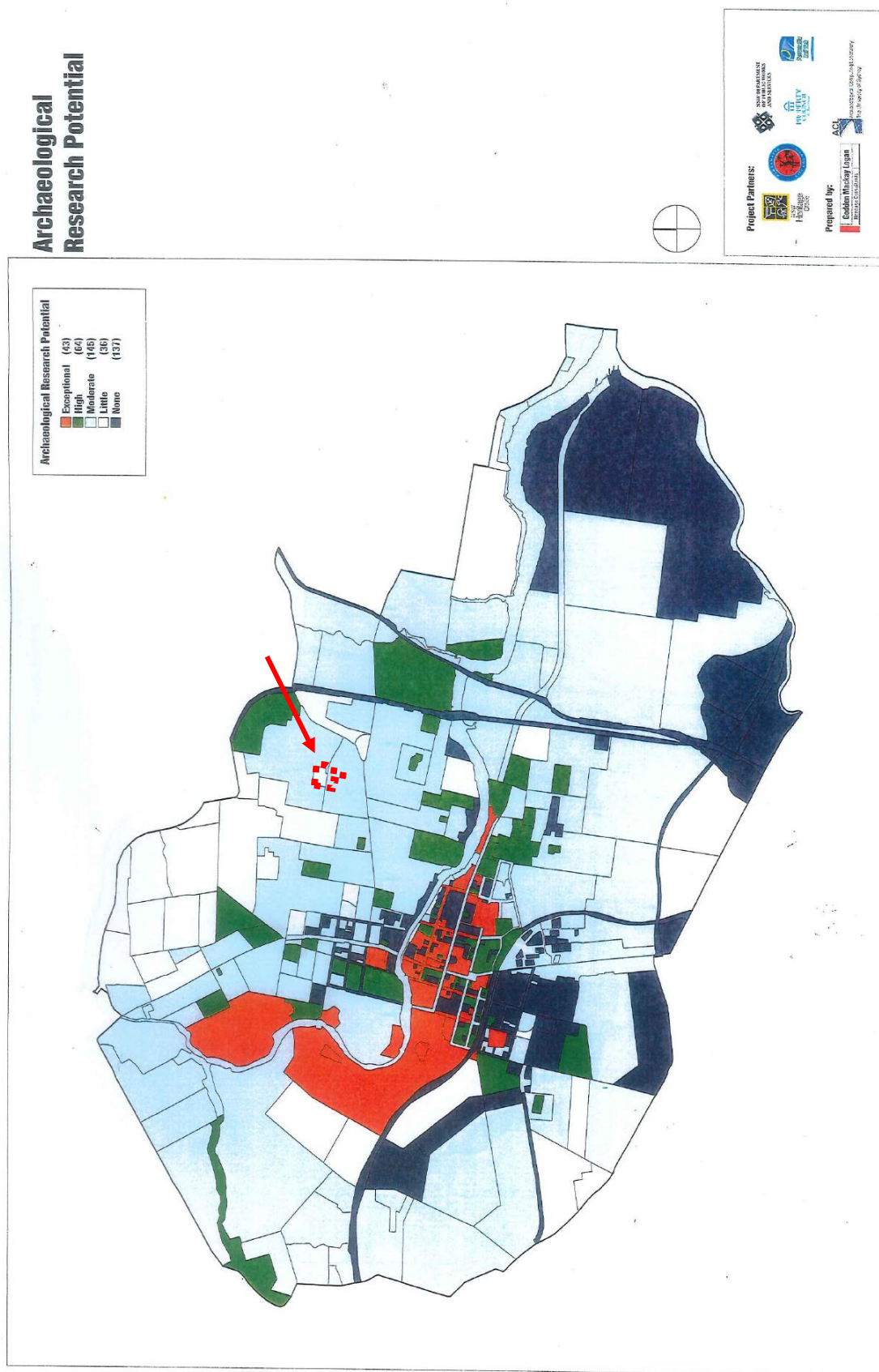


Figure 22: PHALMS Archaeological Research Potential with the site outlined in red (source: Godden Mackay Logan (2000b))

5 HERITAGE SIGNIFICANCE

The concept of 'cultural significance' or 'heritage value' embraces the value of a place or item which cannot be expressed solely in financial terms. Assessment of cultural significance endeavours to establish why a place or item is considered important and why it is valued by the community. Cultural significance is embodied in the fabric of the place (including its setting and relationship to other items), the records associated with the place and the response that the place evokes in the community.

Traditionally it has been the practice to consider archaeological significance purely in terms of a place's or item's research potential, usually by following the "three questions" outlined in Bickford and Sullivan (1984). The *Assessing heritage significance: Guidelines for assessing places and objects against the Heritage Council of NSW criteria* (NSW Department of Planning and Environment, 2023a) require that a broader assessment be undertaken recognising that an archaeological site may be significant for more than simply research reasons.

The Guidelines state (NSW Department of Planning and Environment, 2023a, p. 8):

Heritage significance is embodied in the place itself, its fabric, setting, use, associations, meanings, records, related places, and objects.

Places and objects can also be significant for their intangible values (for example, meaning, associations, connections), not just their physical attributes.

*Heritage significance is the **sum of the heritage values** that a place or object has, as assessed against the criteria, and can represent the aesthetic, historic, scientific, social or spiritual value for past, present or future generations.*

5.1 Significance Assessment Criterion

A detailed set of criteria for assessing the State's cultural heritage was published by Heritage NSW. These criteria are divided into two categories: nature of significance, and comparative significance.

Heritage assessment criteria in NSW fall broadly within the four significance values outlined in *The Burra Charter*. *The Burra Charter* has been adopted by state and Commonwealth heritage agencies as the recognised document for guiding best practice for heritage practitioners in Australia. The four significance values are:

- Historical significance (evolution and association);
- Aesthetic significance (scenic/architectural qualities and creative accomplishment);
- Scientific significance (archaeological, industrial, educational, research potential and scientific significance values); and,
- Social significance (contemporary community esteem).

NSW Department of Planning and Environment (2023a) sets out a detailed process for conducting assessments of heritage significance. The Manual provides a set of specific criteria for assessing the significance of an item, including guidelines for inclusion and exclusion.

The Heritage Council of NSW has adapted specific criteria for heritage assessment, based on *The Burra Charter*, which have been gazetted pertinent to the *Heritage Act 1977*. The criteria are outlined below:

Criterion (a)	An item is important in the course, or pattern, of NSW's cultural or natural history (or the cultural or natural history of the local area).
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Criterion (b)	An item has strong or special association with the life or works of a person, or group of persons, of importance in NSW's cultural or natural history (or the cultural or natural history of the local area).
Criterion (c)	An item is important in demonstrating aesthetic characteristics and/ or a high degree of creative or technical achievement in NSW (or the local area).
Criterion (d)	An item has strong or special association with a particular community or cultural group in NSW (or the 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 cultural or natural history (or the cultural or natural history of the local area).
Criterion (f)	An item possesses uncommon, rare, or endangered aspects of NSW's cultural or natural history (or the cultural or natural history of the local area).
Criterion (g)	An item is important in demonstrating the principal characteristics of a class of NSW's cultural or natural places; or cultural or natural environments (or a class of the local area's cultural or natural places; or cultural or natural environments).

5.2 Levels of Heritage Significance

Items, places, buildings, works, relics, movable objects, or precincts can be of either local or state heritage significance or have both local and state heritage significance. Places can have different values to different people or groups.

Local heritage items

Local heritage items are those of significance to the LGA. In other words, they contribute to the individuality and streetscape, townscape, landscape, or natural character of an area and are irreplaceable parts of its environmental heritage. They may have greater value to members of the local community, who regularly engage with these places and/or consider them to be an important part of their day-to-day life and their identity. Collectively, such items reflect the socio-economic and natural history of a local area. Items of local heritage significance form an integral part of the State's environmental heritage.

State heritage items

State heritage items, places, buildings, works, relics, movable objects, or precincts of state heritage significance include those items of special interest in the state context. They form an irreplaceable part of the environmental heritage of NSW and must have some connection or association with the state in its widest sense.

5.3 Established Significance Assessment of Parramatta Archaeological Management Unit 3068

The following Statement of Significance and Physical Description for PHALMS Unit 3068 has been sourced from the NSW Heritage Inventory (Heritage NSW, 2024a).

Statement of Significance:

This AMU has moderate archaeological research potential.

Little is known of the development of the land which is now the Parramatta East Public School, however, it was near one of the original Parramatta farms and remained largely undeveloped until the second half of the twentieth century.

The physical archaeological evidence within this area may include built landforms, structural features, intact subfloor deposits, open deposits and scatters, ecological samples and individual artefacts which have potential to yield information relating to major historic themes including Agriculture, Environment, Industry and Labour.

Archaeological evidence at this site is likely to be largely intact.

This AMU is of Local significance.

Criterion	Assessment of Significance
Criterion (a)	This AMU provides evidence of a range of historical processes and activities relating to the history of Parramatta. Specific historical and associated values have not been assessed.
Criterion (c)	The archaeological resources of this AMU have no known aesthetic significance although it is recognised that exposed in situ archaeological remains may have distinctive/attractive visual qualities.
Criterion (d)	The potential social values of this AMU have not been assessed. However, some places take on high social values as a result of community interest in archaeological investigations.
Criterion (e)	The archaeological resources of this AMU provide evidence of past human culture and activity and therefore have potential to yield scientific and historical information.
Criterion (f)	This AMU is likely to include scarce physical evidence relating to early colonial settlement.
Criterion (g)	This AMU includes archaeological resources which, as a set, provide a physical chronicle of the history of Parramatta.

Table 3: Established Assessment of Significance for PHALMS Unit 3068 (source: Heritage NSW (2024a))

Physical Description:

The subject area includes above-ground brick and demountable (on piers) classrooms, with open school yards. The area slopes down to the south.

Physical Condition:

The subject area has high potential to contain intact subsurface deposits.

This area may contain archaeological evidence related to the use of this area prior to the establishment of Parramatta East Public School though there is little historical documentation of this period. As much of this AMU remains relatively undisturbed, this area may also contain archaeological deposits associated with the pre-Contact environment and pre-European occupation of this area.

This evaluation is based on historical resources available to, and field survey undertaken for, the Parramatta Historical Archaeological Landscape Management Study 2000 (PHALMS). Analysis of available information has been extensive but not exhaustive. Some elements of the site represented in historical records may not have been discussed within the parameters of the PHALMS project. A comprehensive archaeological assessment of this AMU has not been undertaken.

5.4 Established Significance Assessment of Parramatta Archaeological Management Unit 3196

The following Statement of Significance and Physical Description for PHALMS Unit 3196 has been sourced from the NSW Heritage Inventory (Heritage NSW, 2024b).

Statement of Significance:

This AMU has moderate archaeological research potential.

In 1790, part of this AMU was within the boundary of Farm No. 7 and was later owned by the Marsden Family. In the mid- to late-twentieth century this AMU has been developed for low- and medium- density housing.

The physical archaeological evidence within this area may include built landforms, structural features, intact subfloor deposits, open deposits and scatters, ecological samples and individual artefacts which have potential to yield information about early colonial agriculture relating to major historic themes including Agriculture, Convicts, Technology, Cultural Sites, Townships, Land Tenure and Housing.

Archaeological evidence at this site is likely to have been subject to minor disturbance, with major disturbance in some areas.

This AMU is of Local significance.

Criterion	Assessment of Significance
Criterion (a)	This AMU provides evidence of a range of historical processes and activities relating to the history of Parramatta. Specific historical and associated values have not been assessed.
Criterion (c)	The archaeological resources of this AMU have no known aesthetic significance although it is recognised that exposed in situ archaeological remains may have distinctive/attractive visual qualities.
Criterion (d)	The potential social values of this AMU have not been assessed. However, some places take on high social values as a result of community interest in archaeological investigations.
Criterion (e)	The archaeological resources of this AMU provide evidence of past human culture and activity, and therefore have potential to yield scientific and historical information.
Criterion (f)	This AMU is likely to include scarce physical evidence relating to early agriculture and colonial life in Parramatta.
Criterion (g)	This AMU includes archaeological resources which, as a set provide a physical chronicle of the history of Parramatta.

Table 4: Established Assessment of Significance for PHALMS Unit 3196 (source: Heritage NSW (2024b))

Physical Description:

This AMU predominantly contains brick and fibro housing, which dates from the mid- to late-twentieth century, and several recent town-house complexes. Some of the properties fronting and backing onto Victoria Road are commercial in nature and include a tyre shop, old petrol station, garage, offices, shops and a synagogue.

The topography to the east of Doyle Ground is variable, with a number of quite sloped blocks in this area.

Physical Condition:

This AMU has potential to contain archaeological relics relating to late-eighteenth and early-nineteenth farming practices and other uses of the site up to the twentieth century, which are not well documented in historical records. These archaeological resources are likely to have been subject to disturbance from nineteenth- and twentieth-century development.

This evaluation is based on historical resources available to, and field survey undertaken for, the Parramatta Historical Archaeological Landscape Management Study 2000 (PHALMS). Analysis of available information has been extensive but not exhaustive. Some elements of the

site represented in historical records may not have been discussed within the parameters of the PHALMS project. A comprehensive archaeological assessment of this AMU has not been undertaken.

The 'Recommended Management' actions listed below indicate what may be required to manage archaeological resources within this AMU. Please note that all requirements may not be required for all parts of this AMU.

5.5 Significance Assessment of Buildings within the Site

While the PHALMS Units have been identified as having local heritage significance, there has been no assessment as to whether the existing buildings within the site have heritage significance.

A five-tier system has been adopted to clarify the significance of elements within the site and is based upon the grading listed in *Assessing Heritage Significance* (NSW Department of Planning and Environment, 2023a). In this context, an element is a specific heritage item that contributes to the overall heritage significance of the site. The term interpretation or interpretability is used in the sense of the ability to explain the meaning of the place/item, so as the significance of the place understood.

The five-tier system is outlined in Table 5 and used in Table 6 to assess the extent of significance for the built fabric, landscape features, settings and views which is separate to its heritage significance as stated in the *Assessing Heritage Significance* (NSW Department of Planning and Environment, 2023a).

Grading	Justification	Status
Exceptional	Rare or outstanding element directly contributing to an item's local or State listing.	Fulfils criteria for local and State significance.
High	High degree of original fabric. Demonstrates a key element of the item's significance. Alterations do not detract from significance.	Fulfils criteria for local or State listing.
Moderate	Altered or modified elements. Elements with little heritage value, but which contribute to the overall significance of the item.	Fulfils criteria for local or State listing.
Little	Alterations detract from significance. Difficult to interpret.	Does not fulfil criteria for local or State listing.
Intrusive	Damaging to the item's heritage significance.	Does not fulfil criteria for local or State listing.

Table 5: Grading of Significance

Table 6 presents an evaluation and subsequent statements of significance of the buildings within the site.

Feature Name		Assessment of Significance					Statement of Significance
		E	H	M	L	I	
Block D	Built fabric			x			<p>Block D is one of the earliest school buildings that was established on the Parramatta East school campus. Block D is an example of the "efficient and economic" construction of post-war school buildings that are in the Department of Education's holding.</p> <p>The building is not considered an important component of or will yield information that will contribute to an understanding of the cultural history of NSW or Parramatta. While the site includes land that was once owned by Reverend Samuel Marsden, Block D is not associated with him.</p> <p>Block D is not considered to demonstrate aesthetic characteristics or a high degree of creative or technical achievement in NSW or for the Parramatta district, and it does not hold a strong or special association with a community or cultural group in NSW or the Parramatta district for social, cultural or spiritual reasons.</p> <p>While the style of Block D, as a post-war school building is not common in the Parramatta LGA; overall, it is not assessed as being rare or representative example of late 1940s and early/mid 1950s Department of Education school buildings.</p> <p>If any subfloor deposits were present in Block D, the archaeological remains would likely be associated with everyday use. The subfloor deposits do not hold State or Local heritage significance.</p> <p>Block D is assessed to have no heritage significance separate to its moderate assessment of fabric (refer to Table 5).</p>
	Landscape features				x		
	Settings				x		
	Views				x		
Block E	Built fabric			x			<p>Block E is one of the earliest school buildings that was established on the Parramatta East school campus. Block E is an example of the "efficient and economic" construction of post-war school buildings that are in the Department of Education's holding.</p> <p>The building is not considered an important component of or will yield information that will contribute to an understanding of the cultural history of NSW or Parramatta. While the site includes land that was once owned by Reverend Samuel Marsden, Block E is not associated with him.</p> <p>Block E is not considered to demonstrate aesthetic characteristics or a high degree of creative or technical achievement in NSW or for the Parramatta district, and it does not hold a strong or special association with a community or cultural group in NSW or the Parramatta district for social, cultural or spiritual reasons.</p> <p>While the style of Block E, as a post-war school building is not common in the Parramatta LGA; overall, it is not assessed as being rare or representative example of late 1940s and early/mid 1950s Department of Education school buildings.</p> <p>If any subfloor deposits were present in Block E, the archaeological remains would likely be associated with everyday use. The subfloor deposits do not hold State or Local heritage significance.</p> <p>Block E is assessed to have no heritage significance separate to its moderate assessment of fabric (refer to Table 5).</p>
	Landscape features				x		
	Settings				x		
	Views				x		

Feature Name		Assessment of Significance					Statement of Significance
		E	H	M	L	I	
Block A	Built fabric			x			<p>Block A represents a second phase of construction of school buildings on the Parramatta East school campus during the early 1950s. The building is not considered an important component of or will yield information that will contribute to an understanding of the cultural history of NSW or Parramatta. While the site includes land that was once owned by Reverend Samuel Marsden, Block A is not associated with him.</p> <p>Block A is not considered to possess uncommon, rare, or endangered aspects of NSW or the Parramatta district's cultural history, nor does it demonstrate the principal characteristics of a class.</p> <p>Block A is not considered to demonstrate aesthetic characteristics or a high degree of creative or technical achievement in NSW or for the Parramatta district, and it does not hold a strong or special association with a community or cultural group in NSW or the Parramatta district for social, cultural or spiritual reasons.</p> <p>If any subfloor deposits were present in Block A, the archaeological remains would likely be associated with everyday use. The subfloor deposits do not hold State or Local heritage significance.</p> <p>Block A is assessed to have no heritage significance separate to its moderate assessment of fabric (refer to Table 5).</p>
	Landscape features				x		
	Settings				x		
	Views				x		
Block B	Built fabric			x			<p>Block B represents a second phase of construction of school buildings on the Parramatta East school campus during the early 1950s. The building is not considered an important component of or will yield information that will contribute to an understanding of the cultural history of NSW or Parramatta. While the site includes land that was once owned by Reverend Samuel Marsden, Block B is not associated with him.</p> <p>Block B is not considered to possess uncommon, rare, or endangered aspects of NSW or the Parramatta district's cultural history, nor does it demonstrate the principal characteristics of a class.</p> <p>Block B is not considered to demonstrate aesthetic characteristics or a high degree of creative or technical achievement in NSW or for the Parramatta district, and it does not hold a strong or special association with a community or cultural group in NSW or the Parramatta district for social, cultural or spiritual reasons.</p> <p>If any subfloor deposits were present in Block B, the archaeological remains would likely be associated with everyday use. The subfloor deposits do not hold State or Local heritage significance.</p> <p>Block B is assessed to have no heritage significance separate to its moderate assessment of fabric (refer to Table 5).</p>
	Landscape features				x		
	Settings				x		
	Views				x		

Feature Name		Assessment of Significance					Statement of Significance
		E	H	M	L	I	
Block C	Built fabric			x			<p>Block C represents a second phase of construction of school buildings on the Parramatta East school campus during the early 1950s. The building is not considered an important component of or will yield information that will contribute to an understanding of the cultural history of NSW or Parramatta. While the site includes land that was once owned by Reverend Samuel Marsden, Block C is not associated with him.</p> <p>Block C is not considered to possess uncommon, rare, or endangered aspects of NSW or the Parramatta district's cultural history, nor does it demonstrate the principal characteristics of a class.</p> <p>Block C is not considered to demonstrate aesthetic characteristics or a high degree of creative or technical achievement in NSW or for the Parramatta district, and it does not hold a strong or special association with a community or cultural group in NSW or the Parramatta district for social, cultural or spiritual reasons.</p> <p>If any subfloor deposits were present in Block C, the archaeological remains would likely be associated with everyday use. The subfloor deposits do not hold State or Local heritage significance.</p> <p>Block C is assessed to have no heritage significance separate to its moderate assessment of fabric (refer to Table 5).</p>
	Landscape features				x		
	Settings				x		
	Views				x		
Block F	Built fabric			x			<p>Block F represents a second phase of construction of school buildings on the Parramatta East school campus during the early 1950s. The building is not considered an important component of or will yield information that will contribute to an understanding of the cultural history of NSW or Parramatta. While the site includes land that was once owned by Reverend Samuel Marsden, Block F is not associated with him.</p> <p>Block F is not considered to possess uncommon, rare, or endangered aspects of NSW or the Parramatta district's cultural history, nor does it demonstrate the principal characteristics of a class.</p> <p>Block F is not considered to demonstrate aesthetic characteristics or a high degree of creative or technical achievement in NSW or for the Parramatta district, and it does not hold a strong or special association with a community or cultural group in NSW or the Parramatta district for social, cultural or spiritual reasons.</p> <p>If any subfloor deposits were present in Block F, the archaeological remains would likely be associated with everyday use. The subfloor deposits do not hold State or Local heritage significance.</p> <p>Block F is assessed to have no heritage significance separate to its moderate assessment of fabric (refer to Table 5).</p>
	Landscape features				x		
	Settings				x		
	Views				x		

Feature Name		Assessment of Significance					Statement of Significance
		E	H	M	L	I	
Block G	Built fabric			x			<p>Block G represents a third architectural style of school buildings on the Parramatta East school campus during the early 1950s. The building is not considered an important component of or will yield information that will contribute to an understanding of the cultural history of NSW or Parramatta. While the site includes land that was once owned by Reverend Samuel Marsden, Block G is not associated with him.</p> <p>Block G is not considered to possess uncommon, rare, or endangered aspects of NSW or the Parramatta district's cultural history, nor does it demonstrate the principal characteristics of a class.</p> <p>Block G is not considered to demonstrate aesthetic characteristics or a high degree of creative or technical achievement in NSW or for the Parramatta district, and it does not hold a strong or special association with a community or cultural group in NSW or the Parramatta district for social, cultural or spiritual reasons.</p> <p>If any subfloor deposits were present in Block G, the archaeological remains would likely be associated with everyday use. The subfloor deposits do not hold State or Local heritage significance.</p> <p>Block G is assessed to have no heritage significance separate to its moderate assessment of fabric (refer to Table 5).</p>
	Landscape features				x		
	Settings				x		
	Views				x		
Block H	Built fabric			x			<p>Block H, constructed in the 1970s, represents a third phase of developed at the Parramatta East school campus. The building is not considered an important component of or will yield information that will contribute to an understanding of the cultural history of NSW or Parramatta. While the site includes land that was once owned by Reverend Samuel Marsden, Block H is not associated with him.</p> <p>Block H is not considered to possess uncommon, rare, or endangered aspects of NSW or the Parramatta district's cultural history, nor does it demonstrate the principal characteristics of a class.</p> <p>Block H is not considered to demonstrate aesthetic characteristics or a high degree of creative or technical achievement in NSW or for the Parramatta district, and it does not hold a strong or special association with a community or cultural group in NSW or the Parramatta district for social, cultural or spiritual reasons.</p> <p>If any subfloor deposits were present in Block H, the archaeological remains would likely be associated with everyday use. The subfloor deposits do not hold State or Local heritage significance.</p> <p>Block H is assessed to have no heritage significance separate to its moderate assessment of fabric (refer to Table 5).</p>
	Landscape features				x		
	Settings				x		
	Views				x		
Demountable classrooms	Built fabric					x	<p>The demountable classrooms are not considered an important component of or will yield information, posts, are not considered an important component of or will yield information that will contribute to an understanding of the cultural history of NSW or Parramatta.</p>
	Landscape features					x	

Feature Name		Assessment of Significance					Statement of Significance
		E	H	M	L	I	
	Settings					x	<p>The demountable buildings do not demonstrate aesthetic characteristics or a high degree of creative or technical achievement in NSW or Parramatta.</p> <p>While the demountable buildings do not hold a strong association, with a community or cultural group in NSW or Parramatta for social, cultural or spiritual reasons.</p> <p>The demountable are not considered to possess uncommon, rare, or endangered aspects of NSW or Parramatta's cultural history, nor do they demonstrate the principal characteristics of a class.</p> <p>The demountable buildings do not hold heritage significance.</p>
	Views					x	

Table 6: Evaluation and statements of significance of buildings within the Site

6 HERITAGE IMPACT ASSESSMENT

6.1 Criteria for Quantifying Heritage Impact(s)

Based upon the discussion of impacts to heritage items, impact to these items can be quantified under three main categories: direct impacts, indirect impacts and no impact. These kinds of impacts are dependent on the proposed impacts, nature of the heritage item and its associated curtilage.

Direct impacts

Direct impacts are where the completion of the proposed development will result in a physical loss or alteration to a heritage item which will impact the heritage value or significance of the place. Direct impacts can be divided into whole or partial impacts. Whole impacts essentially will result in the removal of a heritage item as a result of the development where as partial impacts normally constitute impacts to a curtilage or partial removal of heritage values. For the purposes of this assessment direct impacts to heritage items have been placed into the following categories:

- Physical impact - whole: where the development will have a whole impact on a heritage item resulting in the complete physical loss of significance attributed to the item.
- Physical impact - partial: where the project will have a partial impact on an item which could result in the loss or reduction in heritage significance. The degree of impact through partial impacts is dependent on the nature and setting of a heritage item. This typically these impacts are minor impacts to a small proportion of a curtilage of an item or works occurring within the curtilage of a heritage item which may impact on its setting (i.e., gardens and plantings).

Indirect impacts

Indirect impacts to a heritage item relate to alterations to the environment or setting of a heritage item which will result in a loss of heritage value. This may include permanent or temporary visual, noise or vibration impacts caused during construction and after the completion of the development. Indirect impacts diminish the significance of an item through altering its relationship to its surroundings; this in turn impacts its ability to be appreciated for its historical, functional or aesthetic values.

Cumulative impacts

Cumulative impacts relate to minimal or gradual impacts from a single or multiple developments upon heritage values. A cumulative impact would constitute a minimal impact being caused by the proposed development which over time may result in the partial or total loss of heritage value to the site or associated heritage item. Cumulative impacts may need to be managed carefully over the prolonged period of time.

No impact

This is where the project does not constitute a measurable direct or indirect impact to the heritage item.

6.2 Assessment against Local Planning Controls

As previously stated the proposed activity will occur as “development permitted without consent” in accordance with Chapter 3, Part 3.4, Section 3.37 of the *T&I SEPP*, as such an assessment of the proposed activity against Clause 5.10 (Heritage Conservation) of *Parramatta Local Environmental Plan (LEP) 2023*, and Section 7.7 Archaeology of the *Parramatta Development Control Plan 2023* is

not required. However, consideration of the relevant clauses of the LEP and DCP have been undertaken as part of a full assessment of any impacts that the proposed activity may have on PHALMS Units 3068 and 3196 (refer to Sections 6.2.1 and 6.2.2).

6.2.1 Assessment against the Parramatta LEP 2023

The following table addresses Clause 5.10 of the LEP.

Please note that the development pathway is under *the T&I SEPP* and therefore consideration of Clause 5.10 of the LEP have been undertaken as part of a full assessment, however they are not relevant to the planning pathway utilised for this project.

Clause 5.10: Heritage Conservation	This proposal relates to these matters as follows:
<p>(2) Requirement for consent:</p> <p>(a) demolishing or moving any of the following or altering the exterior of any of the following (including, in the case of a building, making changes to its detail, fabric, finish or appearance):</p> <ul style="list-style-type: none"> (i) a heritage item, (ii) an Aboriginal object, (iii) a building, work, relic or tree within a heritage conservation area, <p>(b) altering a heritage item that is a building by making structural changes to its interior or by making changes to anything inside the item that is specified in Schedule 5 in relation to the item,</p> <p>(c) disturbing or excavating an archaeological site while knowing, or having reasonable cause to suspect, that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed,</p> <p>(d) disturbing or excavating an Aboriginal place of heritage significance,</p> <p>(e) erecting a building on land:</p> <ul style="list-style-type: none"> (i) on which a heritage item is located or that is within a heritage conservation area, or (ii) on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance, <p>(f) subdividing land:</p> <ul style="list-style-type: none"> (i) on which a heritage item is located or that is within a heritage conservation area, <p>or</p> <ul style="list-style-type: none"> (ii) on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance. 	<p>The site is not identified as or adjacent to a heritage item on Schedule 5 of the LEP, nor is it located within a Conservation Area (refer to Figure 3). However, it extends across two PHALMS Units, 3068 (Parramatta East Public School) and 3196 (Urban area bounded by Victoria Road, Pennant and Macarthur Streets, Symonds Avenue, Teale Place, the Parramatta East Public School), which are considered to have local heritage significance (refer to Sections 5.3 and 5.4).</p>
<p>(4) Effect of proposed development on heritage significance</p> <p>The consent authority must, before granting consent under this clause in respect of a heritage item or heritage conservation area, consider the effect of the proposed development on the heritage significance of the item or area concerned. This subclause applies regardless of whether a heritage management document is prepared under subclause (5) or a heritage conservation management plan is submitted under subclause (6).</p>	<p>In accordance with this clause, this SoHI has given careful consideration to the proposed works and its likely impact on the assessed heritage significance PHALMS Units No 3068 and 3196, which the site extends across. Included in this SoHI is also an assessment of heritage significance for the existing buildings within the site (refer to Table 6).</p>
<p>(5) Heritage assessment</p>	<p>This SoHI has been prepared in line with Heritage NSW's <i>Guidelines for preparing a statement of</i></p>

Clause 5.10: Heritage Conservation	This proposal relates to these matters as follows:
<p>The consent authority may, before granting consent to any development:</p> <ul style="list-style-type: none"> (a) on land on which a heritage item is located, or (b) on land that is within a heritage conservation area, or (c) on land that is within the vicinity of land referred to in paragraph (a) or (b), <p>require a heritage management document to be prepared that assesses the extent to which the carrying out of the proposed development would affect the heritage significance of the heritage item or heritage conservation area concerned.</p>	<p><i>heritage impact</i> (NSW Department of Planning and Environment, 2023b).</p>
<p>(7) Archaeological sites</p> <p>The consent authority must, before granting consent under this clause to the carrying out of development on an archaeological site (other than land listed on the State Heritage Register or to which an interim heritage order under the <i>Heritage Act 1977</i> applies):</p> <ul style="list-style-type: none"> (a) notify the Heritage Council of its intention to grant consent, and (b) take into consideration any response received from the Heritage Council within 28 days after the notice is sent. 	<p>Based upon the historical context and documentary evidence presented within this assessment, the site has been assessed as having low archaeological potential (refer to Section 4.5.2).</p>

6.2.2 Assessment against the Parramatta Development Control Plan 2023

The following table addresses the relevant controls of the DCP.

Please note that the development pathway is under the T&I SEPP and therefore consideration of the DCP controls have been undertaken as part of a full assessment, however they are not relevant to the planning pathway utilised for this project

Section 7.7 Archaeology	This proposal relates to these matters as follows:
<p>C.02 The SEE must refer to the management recommendations set out in the PHALMS in relation to the subject site, and must show how the applicant intends to comply with those recommendations. If PHALMS recommends further assessment and/or documentation, then such information shall be included in the SEE.</p>	<p>While the PHALMS Indicative Requirements Recommended for Archaeological Investigation for the site includes monitoring, test trenching or sampling (refer to Figure 23), the assessment of archaeological potential detailed in Section 4.5 has assessed that there is low potential for archaeological remains or relics, either of State or local significance, to be encountered during the activity. On this basis, it has been assessed that none of the recommended managements are necessary for the proposal.</p> <p>A mitigation measure for unexpected historic heritage relics or remains has been included in Table 7 (European Heritage Mitigation Measures).</p>

6.3 Consideration of Heritage NSW's Guidelines

Heritage NSW has published a series of criteria for the assessment of impacts to non-Indigenous heritage. The relevant 'questions to be answered' in Heritage NSW's *Guidelines for preparing a statement of heritage impact* (NSW Department of Planning and Environment, 2023b), provided below, have been considered in the preparation of our assessment.

6.3.1 Alterations and additions

The following table assesses the proposal (refer to Section 1.1) in relation to relevant 'considerations for specific types of work' in Heritage NSW's *Guidelines for preparing a statement of heritage impact* (NSW Department of Planning and Environment, 2023b).

Questions to be answered	This proposal relates to these matters as follows:
Are the proposed alterations/additions sympathetic to the heritage item? In what way (e.g. form, proportion, scale, design, materials)?	<p>Parramatta East Public School is not identified as a heritage item, adjacent to a heritage item, or within a Conservation Area (refer to Figure 3). This SoHI has been prepared because the school includes two PHALMS Units, 3068 and 3196 (refer to Figure 4). These units were identified based on their potential to contain archaeological deposits (refer to Sections 4.5, 5.3 and 5.4).</p> <p>Block A is not assessed as having any heritage significance. The refurbishment works for this Block will involve removal of existing internal and external fabric for new openings, new exterior ramp and stairs, and new floor, wall and ceiling finished. The refurbishment and reconfiguration of Block A is designed to allow continued use of the building as part of the day-to-day operation of the school. As these works are limited to the footprint of the existing building, it has been assessed that they will have nil impact on any archaeological remains associated with former Town Boundary Farm No. 7, should they be present.</p> <p>Block B is not assessed as having any heritage significance. The refurbishment works for this Block will involve construction of an internal wall, and new floor, wall and ceiling finished. The refurbishment and reconfiguration of Block C is designed to allow continued use of the building as 2 general learning spaces (GLS). As these works are limited to the footprint of the existing building, it has been assessed that they will have nil impact on any archaeological remains associated with former Town Boundary Farm No. 7, should they be present.</p> <p>Block G is not assessed as having any heritage significance. The refurbishment of this block is designed to allow continued use of the building as a GLS. As these works are limited to the footprint of the existing building, it has been assessed that they will have nil impact on any archaeological remains associated with former Town Boundary Farm No. 7, should they be present.</p> <p>The refurbishment of Block H will involve new furniture, fixtures and equipment. As these works are limited to the footprint of the existing building, it has been assessed that they will have nil impact on any archaeological remains associated with former Town Boundary Farm No. 7, should they be present.</p> <p>Blocks C, D, E and F will be demolished in order to construct Block R, a 3-storey building. The footprint of Block R is larger than the previous buildings; however, it is necessary as part of providing more GLS spaces in order to accommodate an anticipated growth in the number of students. It is possible that if archaeological remains associated with former Town Boundary Farm No. 7 are present, that they may be</p>

Questions to be answered	This proposal relates to these matters as follows:
	<p>exposed as part of demolition of Blocks C, D, E and F, and earthworks for the establishment of the footings and services for Block R.</p> <p>The existing demountable buildings do not have heritage significance. The removal of these structures will also involve removal of any services, such as powers.</p>
Will the proposed works impact on the significant fabric, design or layout, significant garden setting, landscape and trees or on the heritage item's setting or any significant views?	<p>There are no significant views to or from the site. The construction of Block R will not impact any view lines. The existing school buildings were not assessed as having heritage significance. On this basis it has been assessed that the proposed refurbishments to Blocks A, B, G and H would not impact any significant fabric, design, or layout. Nor will the demolition of Blocks C, D, E, and F impact any significant fabric or design of these buildings.</p> <p>No significant garden setting, landscape or trees were identified as part of the background research or site inspection.</p>
Are the additions sited on any known or potentially significant archaeological relics? If yes, has specialist advice from archaeologists been sought? How will the impact be avoided or mitigated?	<p>Block R will be constructed on the location of Blocks C, D, E and F. The background research has not identified any structures associated with former Town Boundary Farm No. 7 being present within the site. Any archaeological remains associated with former Town Boundary Farm No. 7 would most likely be associated with the property boundaries and evidence of early farming practices dating from the late 18th century. Examples of these types of remains are also well documented elsewhere, such as in Parramatta Park.</p> <p>A mitigation measure for unexpected historic heritage relics or remains has been included in Table 7 (European Heritage Mitigation Measures).</p>

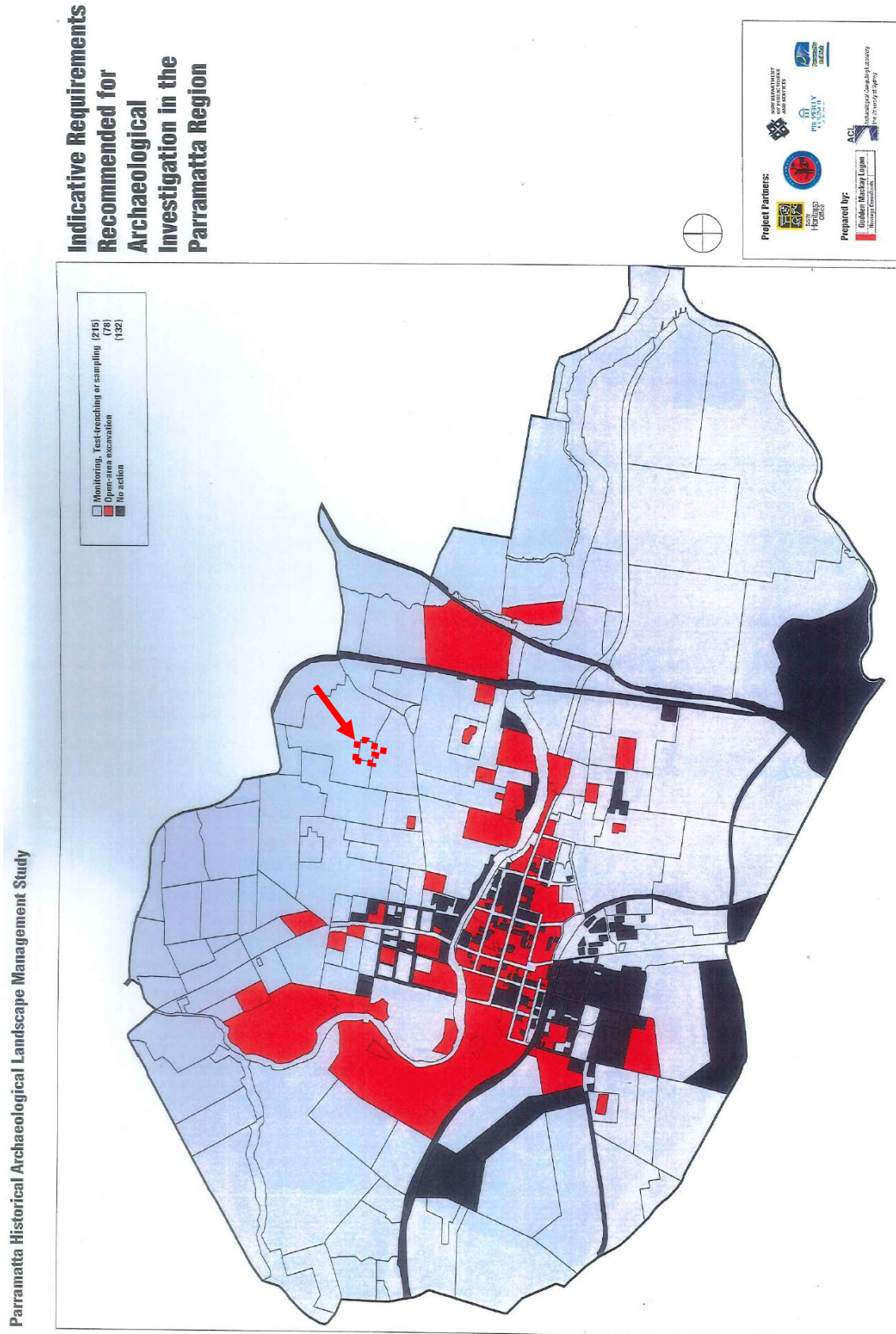


Figure 23: PHALMS Indicative Requirements Recommended for Archaeological Investigation in the Parramatta Region with the site outlined in red (source: Godden Mackay Logan (2000b))

7 MITIGATION MEASURES

This SoHI has assessed that there is low potential for archaeological remains or relics associated with former Town Boundary Farm No. 7 (PHALMS Unit 3196) to be present within the Project Area (refer to Section 4.5). In addition, this SoHI has also assessed that there is low potential for archaeological remains or relics associated with early use of PHALMS Unit 3068 to be present.

It has been assessed that the extent and nature of the potential impacts that proposed activity may have is low.

The European heritage mitigation measures that apply to the project are presented below (Table 7).

Project Stage ¹	Mitigation Measure	Reason for Mitigation Measure	Relevant section of report
C	If relics of local heritage significance are identified an excavation permit under Section 140 of the <i>Heritage Act 1977</i> may need to be sought prior to works recommencing.	An excavation permit under Section 140 of the <i>Heritage Act 1977</i> is required if an activity will have a major impact on relics of local heritage significance. As part of addressing any unexpected historic find there would be an assessment of the potential impact that the activity would have on the relic.	2
C	Prior to the commencement of works, all relevant staff and contractors should be made aware of their statutory obligations for heritage under the <i>Heritage Act 1977</i> , which may be implemented as a heritage induction. If suspected historic cultural heritage material are uncovered during the course, work must cease immediately in that area. A suitably qualified archaeologist must undertake a site visit to inspect and assess the object(s). If relics are found, notification of the relic's location under section 146 of the <i>Heritage Act 1977</i> is required.	To manage unexpected Aboriginal heritage finds, prevent against inadvertent harm, and to comply with legal obligations under the <i>Heritage Act 1977</i> .	2

Table 7: European Heritage Mitigation Measures

¹ Design (D)
Construction (C)
Operation (O)

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