

26 March 2025

Our Ref: H-23092

Jodi Gleeson

NSW Department of Education
Level 8, 259 George Street
SYDNEY NSW 2000

Jodi.Gleeson2@det.nsw.edu.au

Dear Jodi,

RE: STATEMENT OF HERITAGE IMPACT FOR ULLADULLA PUBLIC SCHOOL

EXECUTIVE SUMMARY

This Statement of Heritage Impact (SOHI) has been commissioned to support a Review of Environmental Factors (REF) for the NSW Department of Education (DoE) upgrades to Ulladulla Public School (the activity), which is located at 241 Green Street, Ulladulla NSW 2539 (subject site).

The purpose of the REF is to assess the potential environmental impacts of the activity prescribed by *State Environmental Planning Policy (SEPP) Transport and Infrastructure 2021* 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 *SEPP (Transport and Infrastructure) 2021*.

Part of Ulladulla Public School is identified as a heritage item under Part 1 of Schedule 5 of the *Shoalhaven LEP 2014* as 'Victorian Georgian style Sandstone School and Schoolmaster's Residence', 241 Green Street, item no. 484. It is also listed on the Department of Education Section 170 Conservation Register as 'Ulladulla Public School - Building B00A'.

This SOHI has been prepared in accordance with the *Guidelines for Division 5.1 assessments (The Guidelines)* by the Department of Planning, Housing and Infrastructure. The purpose of the report is to assess the proposed activity in relation to the relevant control and provisions contained within the *Shoalhaven Local Environmental Plan (LEP) 2014*, *Shoalhaven Development Control Plan (DCP) 2014* and *State SEPP (Transport and Infrastructure) 2021*.

In conclusion, it is considered by City Plan Heritage that:

1. The extent and nature of potential impacts are low and will not have a significant impact on the heritage locality, community and environment.
2. There are no mitigation measures applicable to the proposal that need to be implemented as the proposed works have no identified heritage impacts.

The proposal has no physical impacts to the 'Victorian Georgian style Sandstone School and Schoolmaster's Residence' (item no. 484), with the proposed location for the new school building sufficiently distanced away from the heritage listed building. There are also no visual impacts on the heritage item as there are no sightlines between the item and the proposed location (due to the school's existing building

stock). The proposed activity also has no visual impacts on any heritage items in the vicinity of the school due to the distance away and lack of clear sightlines to the heritage item. As a result, the new homebase building was assessed as having no visual or physical impact on the school's heritage item.

1. THE SUBJECT SITE

Ulladulla Public School is located at 241 Green Street, Ulladulla NSW 2539. The site is located within the Shoalhaven Local Government Area (LGA) and has an approximate area of 3.5 hectares. An aerial photograph of the site is provided at Figure 1. The site is comprised of three lots, legally referred to as follows:

- Lot 1 in Deposited Plan 122514
- Lot 1 in Deposited Plan 529425
- Lot 1 in Section 16 in Deposited Plan 759018

The site is zoned 'SP2 Educational Establishment' and the existing development comprises various buildings, a car park, landscaping, a sports field and sports courts associated with Ulladulla Public School. Ulladulla Public School currently includes 22 Permanent Teaching Spaces (PTS) and 11 Demountable Teaching Spaces (DTS). The western portion of the site contains playing fields, sports courts and parking. Vegetation is interspersed throughout the site.

The site is irregularly shaped with a long frontage to Green Street to the south. Land to the north of the site is zoned RE1 which consists of natural bushland. Low density residential dwellings adjoin the site along the western boundary.

2. HERITAGE LISTING

Part of Ulladulla Public School is identified as a heritage item under Part 1 of Schedule 5 of the Shoalhaven LEP 2014 as 'Victorian Georgian style Sandstone School and Schoolmaster's Residence', 241 Green Street, item no. 484. This applies to only two allotments within the school including Lot 1 DP 122514 and Lot 3 DP 851748.

The subject site is also listed on the Department of Education Section 170 Conservation Register as 'Ulladulla Public School - Building B00A'.¹

Additionally, the subject site is in proximity to the following heritage items of local heritage significance (Figure 2):

Environmental Planning and Assessment Act, 1979

Shoalhaven Local Environmental Plan (LEP) 2014, Part 1 Heritage items

- Sandstone Weir – Millards Creek, St Vincent Street, item no. 492
- Relocated Victorian Georgian Timber Slab Worker's Cottage, 275 Green Street, item no. 485

¹ NSW State Heritage Inventory (SHI), 'Ulladulla Public School - Building B00A', Item ID 5065741, available from: <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=5065741>.

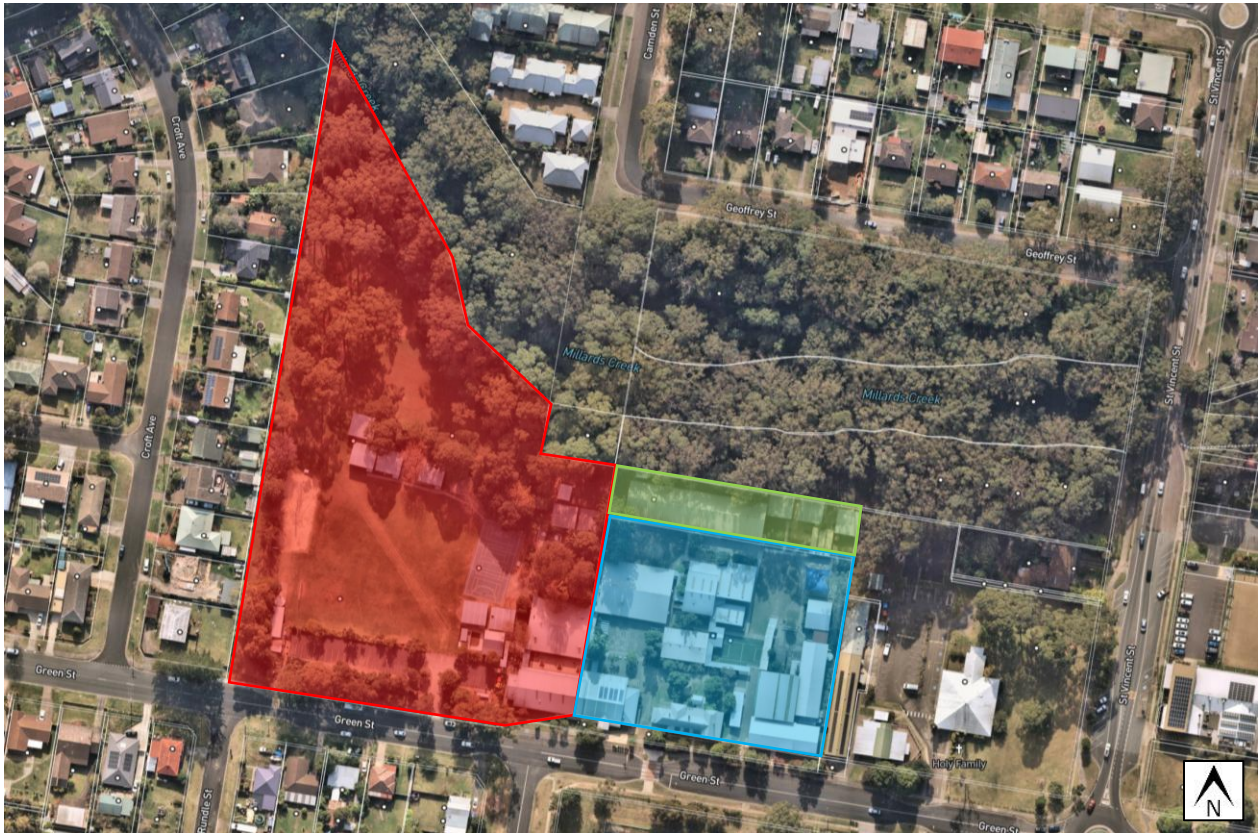


Figure 1: Aerial map with allotment boundaries indicated. Lot 1 DP 122514 (indicated in blue) and Lot 3 DP 851748 (indicated in purple) are identified as the heritage curtilage of heritage item 484 ("Victorian Georgian style Sandstone School and Schoolmaster's Residence"). Lot 1 DP 529428 (indicated in red) is not within the heritage curtilage. Lot 1 Section 16 DP 759018 (indicated in green) is also not identified as the heritage curtilage. Source: Overlay of Near Maps, 2023 Imagery.

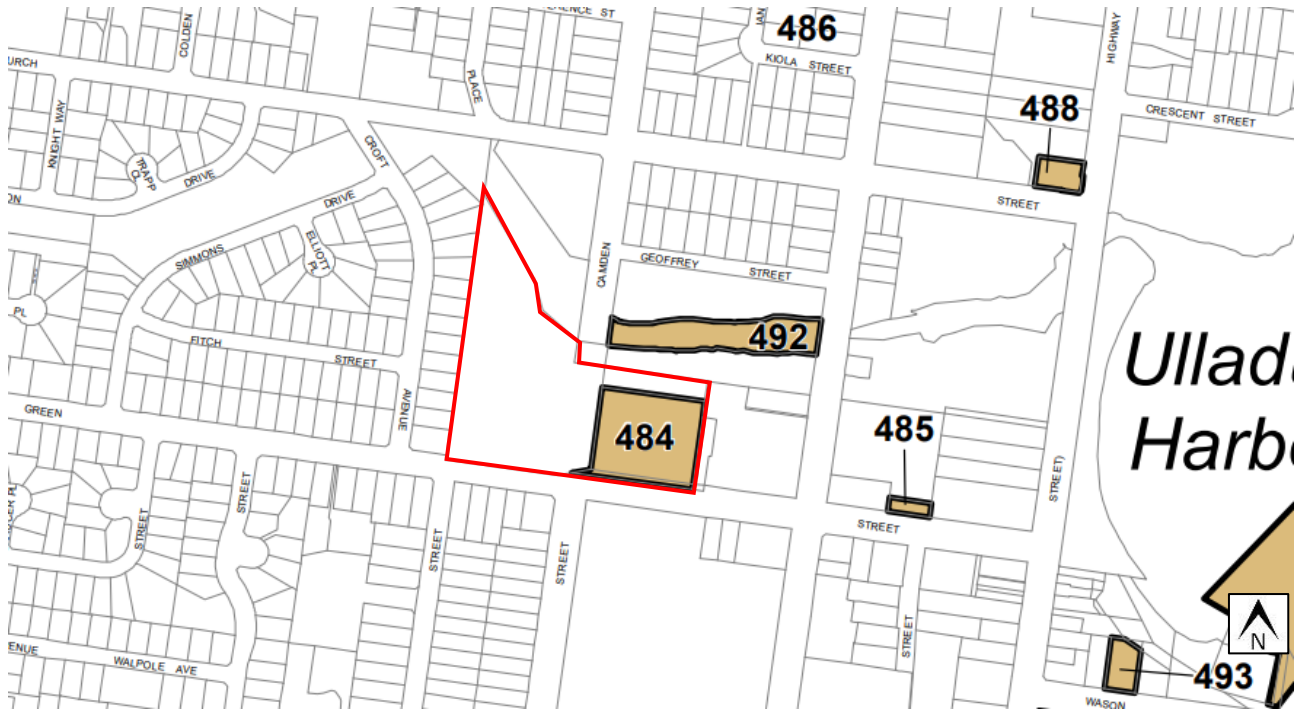


Figure 2: Heritage Map of Ulladulla, showing the school site at 241 Green Street (indicated in red) and the surrounding heritage context. Source: Shoalhaven LEP 2014, Heritage Map – Sheet HER_016D.

3. SCOPE OF WORKS

The proposed activity relates to upgrades to Ulladulla Public School. Specifically, the proposed activity comprises the following:

- Construction of a new two-storey homebase building over existing car park.
- Alterations to existing car park under new building.
- Construction of new stairs and covered walkways.
- Installation of new fencing.
- External landscape works.
- Installation of solar panels
- Installation of new pedestrian gate and fire brigade booster.
- Tree removal.

Any works relating to the demountables or works associated with substations will be undertaken via a separate planning pathway.

It is noted that the above works are situated within the two allotments of the school which are not identified within the heritage curtilage for item I484 (as identified above in Figure 2).

The following drawings prepared by Fulton Trotter Architects have been considered in preparation of this SOHI:

Date	Drawing Title	Drawing No.	Issue
18.03.2025	Cover Sheet + Drawing List	DR A 0000	07
18.03.2025	Specifications Schedule & Material Selection	DR A 0001	05
18.03.2025	Specifications Schedule & Material Selection	DR A 0002	02
18.03.2025	Specifications Schedule & Material Selection	DR A 0003	01
18.03.2025	Existing & Demolition Site Plan	DR A 1001	09
18.03.2025	Site Analysis	DR A 1002	04
18.03.2025	Proposed Site Plan	DR A 1101	11
18.03.2025	Site Sections	DR A 1201	09
18.03.2025	Shadow Diagrams	DR A 1301	04
18.03.2025	Shadow Diagrams	DR A 1302	04
18.03.2025	Shadow Diagrams	DR A 1303	01
18.03.2025	External Works Plan	DR A 1401	03
18.03.2025	Staging Plan	DR A 1501	07
18.03.2025	Playspace Calculation	DR A 1601	04
18.03.2025	Proposed Amenities Strategy	DR A 1602	04
18.03.2025	Access Strategy	DR A 1603	02
18.03.2025	Indigenous Artwork Strategy	DR A 1604	02
18.03.2025	Construction Management Plan	DR A 1605	02
18.03.2025	Public Domain Plan	DR A 1701	03
18.03.2025	Proposed Level 1 Floor Plan	DR A 2102	10
18.03.2025	Proposed Level 1 Ceiling Plan	DR A 2202	06

18.03.2025	Proposed Ground Floor Plan	DR A 2101	10
18.03.2025	Proposed Roof Plan	DR A 2104	10
18.03.2025	Proposed Level 2 Floor Plan	DR A 2103	10
18.03.2025	Proposed Level 2 Ceiling Plan	DR A 2201	06
18.03.2025	Proposed Elevations	DR A 3201	05
18.03.2025	Proposed Elevations	DR A 3202	05
18.03.2025	Proposed Sections	DR A 3301	05
18.03.2025	Façade Strategy	DR A 3401	08
18.03.2025	External Materials and Finishes	DR A 3402	04
18.03.2025	External Wall Type Details	DR A 4001	05
18.03.2025	Internal Wall Type Details	DR A 4002	05
18.03.2025	Typical Detail Section 01	DR A 4201	05
18.03.2025	Typical Detail Section 02	DR A 4202	05
18.03.2025	Stair & Ramp Details	DR A 4401	03
18.03.2025	Handrail & Balustrade Details	DR A 4501	03
18.03.2025	Typical Covered Walkway Details	DR A 4801	03
18.03.2025	Typical Fascia Details	DR A 4901	03
18.03.2025	Core Amenities Room Layout Plans - First Floor	DR A 5001	01
18.03.2025	Core Amenities Room Layout Elevations - First Floor	DR A 5002	01
18.03.2025	Core Amenities Room Layout Plans - Second Floor	DR A 5003	01
18.03.2025	Core Amenities Room Layout Elevations - Second Floor	DR A 5004	01

18.03.2025	Support Learning Unit Room Layout Plan	DR A 5005	01
18.03.2025	Support Learning Unit Room Layout Ceiling Plan	DR A 5006	01
18.03.2025	Support Learning Unit Room Layout - Elevations	DR A 5007	01
18.03.2025	Support Learning Unit Room Layout - Wet Areas	DR A 5008	01
18.03.2025	External Door & Window Schedule	DR A 6001	01
18.03.2025	Internal Door & Window Schedule	DR A 6002	01
18.03.2025	Perspectives 01	DR A 9001	04

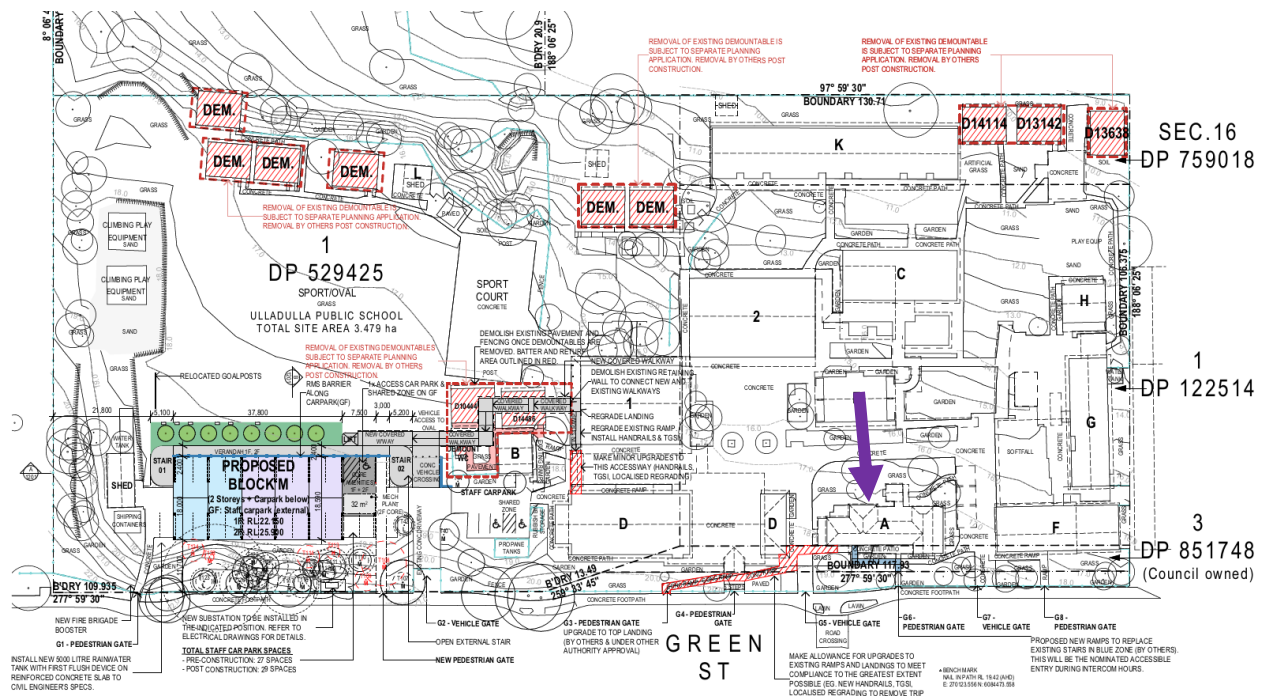


Figure 3: Proposed Site Plan for Ulladulla Public School, indicating location of proposed building. Heritage item is Building A (indicated by purple arrow). Prepared by Fulton Trotter Architects, 2025.

4. LIMITATIONS AND CONSTRAINTS

- A detailed historical archaeological assessment or an assessment of Aboriginal cultural heritage values is not within the scope of this report as it was investigated by Apex Archaeology.

- This assessment does not include a heritage landscape assessment.
- Historical research undertaken as part of the previous Summary Report of Initial Site Investigations (SRISI) prepared by CPH was based only on desktop research only and limited to the resources readily available through online platforms.
- The subject site was not inspected by CPH, however, detailed photography identifying the existing condition and setting of the subject site has been undertaken by DoE in August and October 2024. This report relies on the photography provided.

5. SITE CONTEXT AND DESCRIPTION

Ulladulla Public School is located within the suburb of Ulladulla, which is situated within the City of Shoalhaven Local Government Area (LGA), approximately 230 km south of Sydney. The area surrounding the subject site consists of low density residential, commercial and recreational development. Ulladulla Harbour is located approximately 400m east of the subject site, and the Ulladulla High School is located to the south opposite the public school.

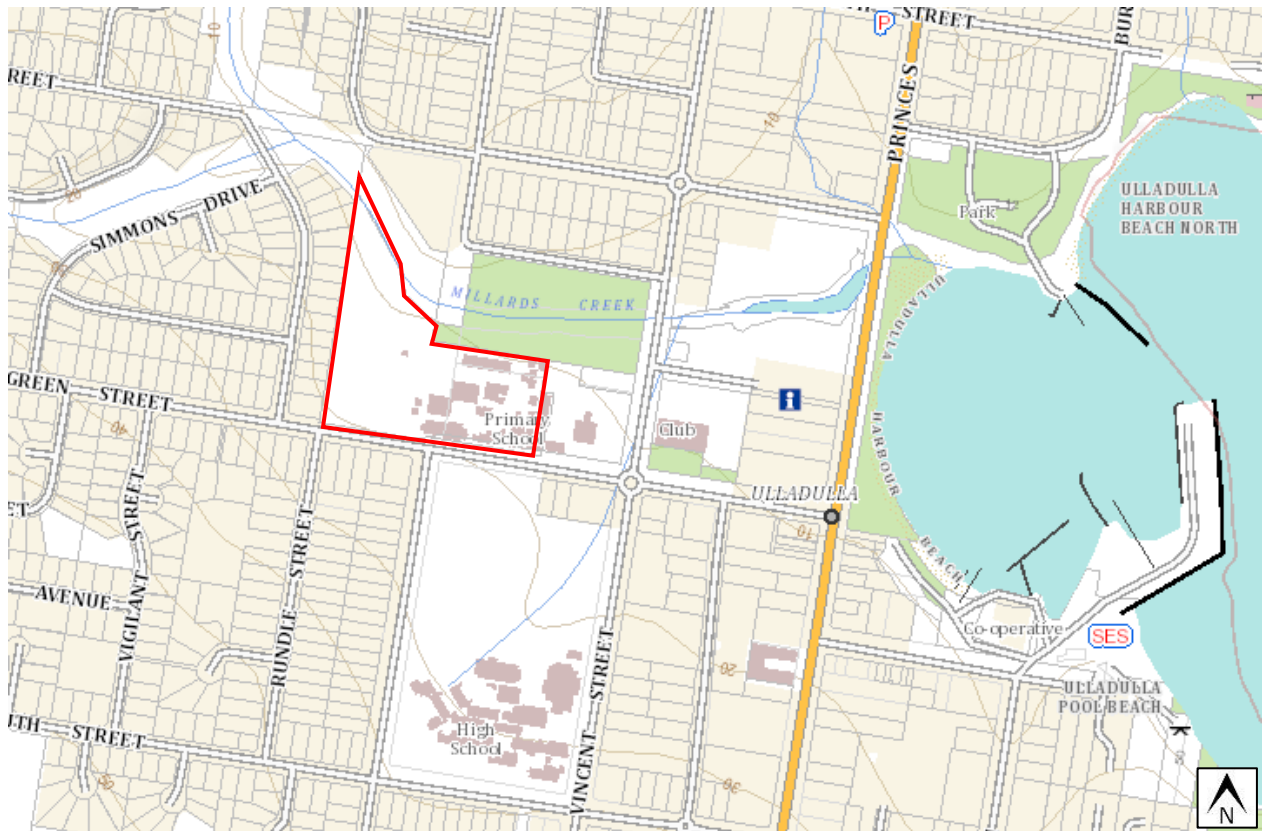


Figure 4: Cadastral map showing location of the subject site within its surrounding context. Source: SIX Maps, accessed October 2024.

The subject Ulladulla Public School site consists of a heritage listed sandstone school and residence building (Block A), several brick and weatherboard school blocks and demountable buildings that are primarily concentrated on the eastern part of the allotment (though some demountable buildings are located

on the western half of the school). Altogether, there are 22 permanent teaching spaces and 11 demountable teaching spaces occupying the site. The sport grounds and school carparking are located on the western elevation of the site, whilst the northern part of the school is occupied by mature trees and open grass areas.

Most of the permanent teaching spaces are under brick, single storey structures under gable corrugated iron roofs. Block B (Figure 11) and Block F (Figure 16) are single storey weatherboard buildings constructed on piers and Block C is a single storey U-shaped brick structure with a second storey extension (Figure 12 and Figure 13). Building D features two single storey brick structures connected by a covered outdoor area (Figure 14). The interiors of the buildings have a modern look.

The following description of the heritage listed sandstone school block has been extracted from the Department of Education s.170 listing:

The original building, designed in the Victorian Georgian style, is a single storey sandstone building with decorative quoining and a hip and gable colourbond roof. When the building was completed it comprised a rubble stone classroom with adjoining residence consisting of three rooms (Source: Robert Demkiw).

Photographic evidence suggests the original roof cladding was timber shingles. The current roofline is adorned with four simple, rendered chimneys, some with terracotta chimney pots. At least one original chimney has been removed. An additional chimney is located on the rear, northern timber section of the building. This chimney has a simpler form suggesting its original location was within a service room (possibly a kitchen). This chimney has been modified to increase its height and clearance above the apex of the roof.

The front, south elevation of the building, addressing Green Street, has a narrow verandah that runs the length of the original building. The main colourbond roof extends over the verandah with a slight change in pitch, the spreading verandah roofline is typical of Victorian Georgian buildings. The verandah is characterised by plain timber verandah posts and a later concrete floor (it is likely the original verandah floor was timber). The original building was symmetrical with the verandah running the full length of the front elevation. However, the subsequent stone and timber additions, at each end, have resulted in an asymmetrical form.

The window openings and joinery on the main, front elevation appear to be original. The window surround on the sandstone addition has a projecting, sandstone surround which differentiates it from those on the original building. The original windows have projecting sandstone sills with sandstone quoining to both sides. (The lintel treatment cannot be ascertained from the photographs). The doors and verandah ceiling lining are not visible and thus cannot be described.

Due to the slope of the land the projecting sandstone base of the building is deeper and thus more evident on the rear, north elevation. The base is characterised by larger sandstone blocks with a rock-faced finish as opposed to the sandstone above the floor level where the blocks are smaller, vary in size [sic] have a smoother finish and wider mortar joints.

The timber addition attached to the east elevation of the original building has a half gabled roofline, decorative timber gable brackets and raked eaves suggesting a Federation era construction date (1890-1915). The timber framed windows are double hung with multi faceted top panes. This section of the building is supported by sandstone piers/posts with a timber picket skirt to the foundation space. A skillion addition has been subsequently added which is distinguished from the earlier timber addition by its brick piers/posts, c1950 window joinery and chamfered weatherboard profile.

The timber addition to the north although it adjoins the main building has a separate, gabled colourbond roof and separate entrance. Access to this section of the building is through the sandstone building as well as a separate access via timber stairs and verandah on its eastern elevation. The lower set, relatively flat, verandah roof provides weatherproof access to the original building. This addition is supported by painted brick piers. There is a projecting brick chimney with a sandstone rubble base attached to the western elevation. The date of this modification is unclear, the pitch of the roof, piers and window joinery suggest the Inter-War period. Although it is possible that the building has been modified over time and this addition has an earlier construction date.

Two hoop pines planted in 1943 are significant landscape features on the site. There may be other significant elements such as honour boards, school bells etc that have not as yet been identified.

(This description has been carried out using photographs dating from 2011 and google maps. Therefore, this information may be out of date and no longer accurate if modifications to the building have taken place subsequent to 2011. A more detailed, accurate description would require a site visit). Internal elements have not been described.



Figure 5: General view of Ulladulla Public School from sports oval showing the area proposed for the construction of a new two storey block (above the existing carparking).



Figure 6: Heritage listed Block A, southern and eastern elevations.



Figure 7: Heritage listed Block A, southern elevation.



Figure 8: Heritage listed Block A, northern elevation.



Figure 9: Heritage listed Block A, interior (left) and blocked fireplace details (right).

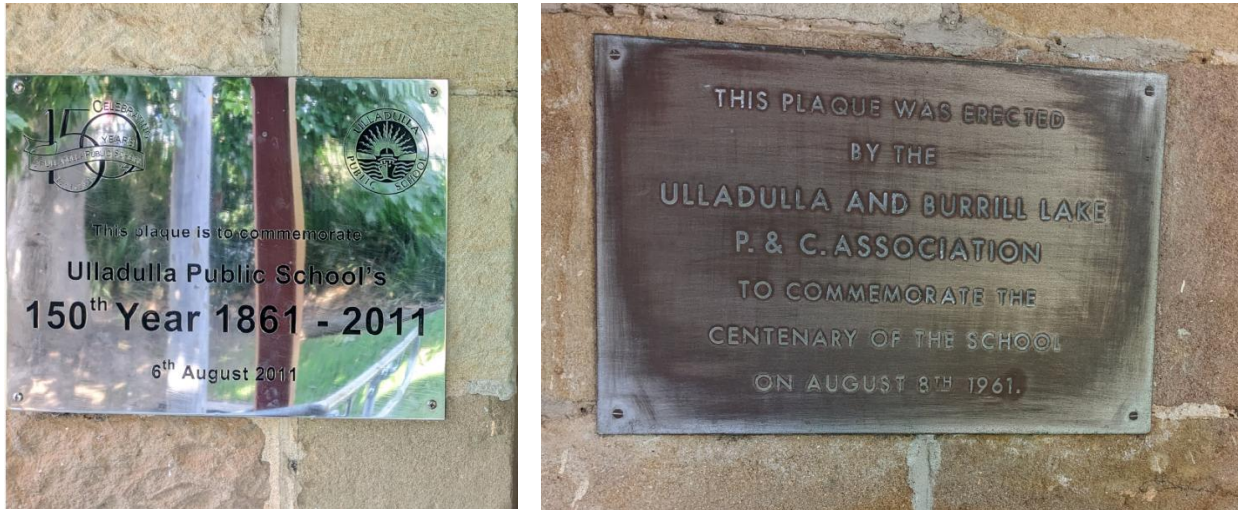


Figure 10: Commemorative plaques attached to façade of heritage listed Block A.



Figure 11: Building B, southern elevation.



Figure 12: Block C eastern elevation (left) and southern elevation with Block 2 (right).

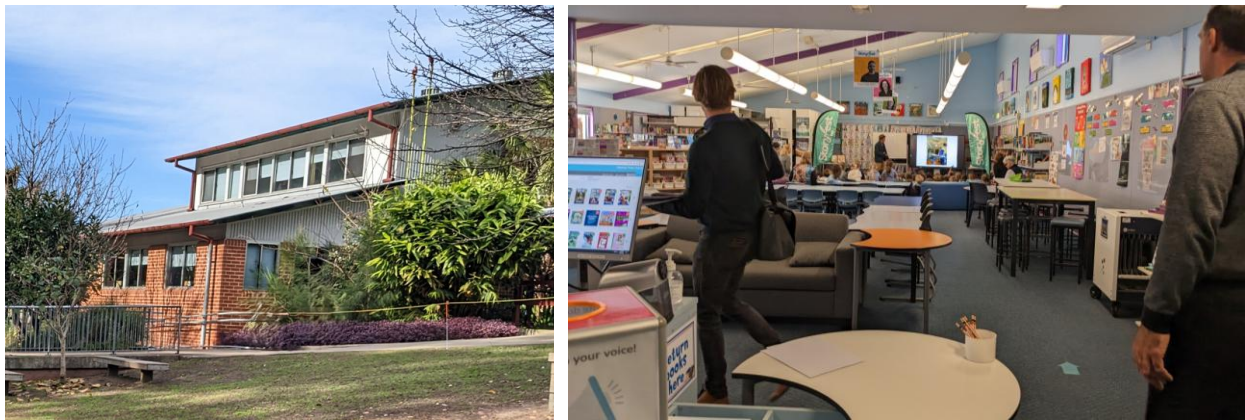


Figure 13: Block C northern and western elevations (left) and interior (right).

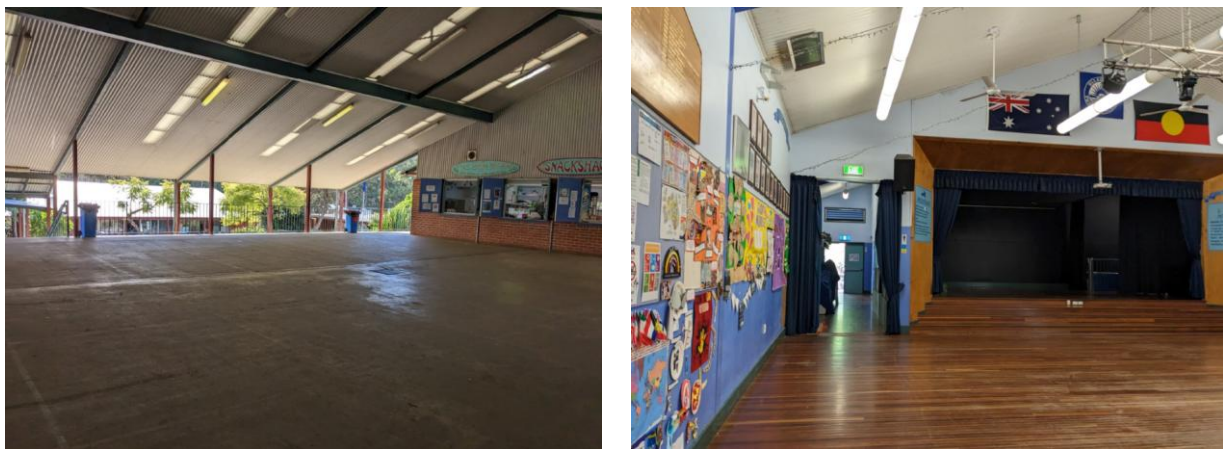


Figure 14: Block D exterior with covered outdoor area (left) and interior (right).



Figure 15: Block E exterior (left) and interior (right).



Figure 16: Block F exterior (left) and interior (right).



Figure 17: Block G western elevation looking north (left) and interior (right).



Figure 18: Block H southern elevation (left) and interior (right).



Figure 19: Block K, southern elevation.



Figure 20: Block 1 southern elevation looking east (left) and Block D northern elevation (right).



Figure 21: Block 2 eastern elevation (left) and northern elevation (right).



Figure 22: Building L (shed) proposed for demolition (left) and play area (right).



Figure 23: Undeveloped north-western part of the Ulladulla Public School.

6. BRIEF HISTORY

The following brief historical information has been sourced from the previous European Heritage SRISI prepared by CPH (December 2023).

6.1. Indigenous History

As per the Milton Ulladulla Historical Society website:²

The Milton-Ulladulla district is a unique part of Australian and New South Wales heritage. First Nations people, the Murramarang of the Yuin Nation thrived in its tall forests and coastal waters and enriched the local landscape with their art and cultural practices. British colonists arrived from 1828, and the district's towns reflect the early expansion of the timber industry and later dairying, followed by silica mining and then tourism.



Figure 24: Map of Indigenous Australia, with Ulladulla (identified in blue) within the lands of the Yuin Nation. Source: Australian Institute of Aboriginal and Torres Strait Islander Studies (AIATSIS), 'Map of Indigenous Australia', available from: <https://aiatsis.gov.au/explore/map-indigenous-australia>.

² Milton Ulladulla Historical Society (MUHS), 'Our History', available from: <https://muhsinc.org.au/>.

6.2. History of Ulladulla

The following history of the suburb of Ulladulla has been extracted from the Milton Ulladulla Historical Society website:³

In 1828 Alexander Macleay, a Scottish migrant, selected 8,100 acres of land in the County of St Vincent just south of Reverend Kendall's land. He described the land as lying:

"west, and southwest of a boat harbour, called Nulla Dollo"

The name 'Nulla Dollo', or 'Nulladolla' or 'Wollahderrah' (used by Surveyor Florance in 1828) as it was variously spelled has several possible derivations but is most likely an attempt to transcribe the local Aboriginal name into English.

When European settlers first arrived in this area of the New South Wales South Coast, spreading out from settlements in the Southern Highlands, coastal roads were virtually non-existent south of Shoalhaven (Nowra) due to the large number of lakes, lagoons and estuaries that needed to be crossed. Supplies and exports all had to be shipped via 'Boat Harbour' as it became known. At that time, the name 'Ulladulla' did not mean the current town but was applied to the whole area between the coast and the mountains and from Conjola to Burrill.



Figure 25: Photograph of Millards Creek Bridge at Ulladulla in c1900. Source: MUHS, 'Towns of Milton-Ulladulla', available from: <https://muhsinc.org.au/our-places/towns-of-milton-ulladulla/>.

As the commercial centre around the harbour expanded with the shipping of farming produce and timber, the arrival of new settlers and the start of a ship-building industry, government services were established, with a Post Office in 1842. By 1856 The Settlement (Milton) and Boat Harbour had a

³ MUHS, 'Towns of Milton-Ulladulla', available from: <https://muhsinc.org.au/our-places/towns-of-milton-ulladulla/>.

combined population of about 400, and several stores and churches and a public house but no constable, magistrate or doctor. Boat Harbour, although a safe haven for coastal shipping (there are no shipwrecks around Ulladulla) lacked jetty facilities, with stores still being loaded via the beach.

By March 1857, the Surveyor General had completed a survey of the Village Reserve of Ulladulla and in 1858 the harbour's facilities improved with a timber jetty that was then replaced by a 75m long stone pier in 1865.



Figure 26: Ulladulla Harbour as captured in c1873, showing lighthouse and the remains of an old wooden wharf from 1858. Source: MUHS, 'Towns of Milton-Ulladulla', available from: <https://muhsinc.org.au/our-places/towns-of-milton-ulladulla>.

6.3. History of the Subject Site

Ulladulla Public School is situated within 2 acres of land (being part Lot 1 DP 122514 and containing the heritage listed sandstone school block) that was granted to the Council of Education in 1870 (Volume 122 Folio 48). The land title document identifies that the lands were dedicated "*as the site for a School House under the control and management of the Council of Education.*" The land title document also identifies that an existing "*school*" and "*dwelling*" were situated to the east of the current site, north of the Roman Catholic Church. Indeed, newspaper articles that predate this dedication show that a "*day and boarding school at Ulladulla*" was intended to be opened in February 1861 by Mr and Mrs L. L. Rutter.⁴ A birth notice in the Sydney Morning Herald from 1868 also identifies that the wife of Mr D T Lewis gave birth "*at her residence,*

⁴ *Illawarra Mercury*, 'Advertising', 15 January 1861, p. 3, available from: <https://trove.nla.gov.au/newspaper/article/132224317>.

Public School, Ulladulla” to a son.⁵ This suggests that education was provided to children at Ulladulla prior to 1870.

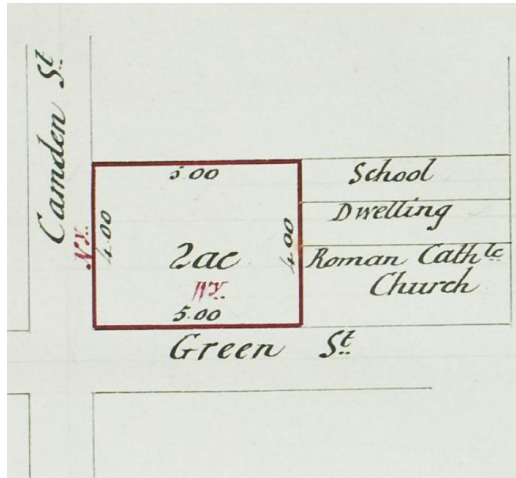


Figure 27: Schedule attached to the certificate of title issued to the Council of Education in 1870. Source: NSW Land Registry Services Historical Land Records Viewer (NSW LRS HLRV), Volume 122 Folio 48.

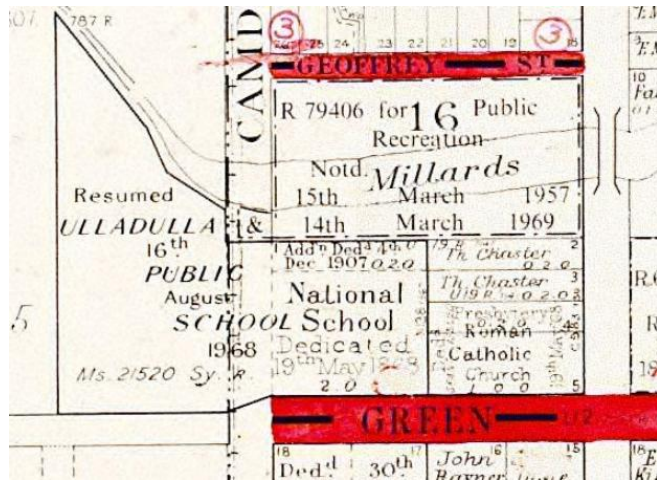


Figure 28: 1969 map of Town of Ulladulla and Adjoining Lands. Source: NSW LRS HLRV, AO Map No.38862.



Figure 29: Undated image of Ulladulla Public School. Source: Wollongong City Library, 'Ulladulla - Schools and Colleges - Ulladulla Public School', available from: <https://wollongong.spydus.com/cgi-bin/spydus.exe/ENQ/WPAC/BIBENQ?IRN=17548058&FMT=IMG&SETLVL=>.

⁵ Sydney Morning Herald, 'Family Notices', 24 September 1868, p. 1, available from: <https://trove.nla.gov.au/newspaper/article/13173287>.

The following history of the subject site has been extracted from Department of Education s.170 listing for the site:

The increasing industry and associated population [at Ulladulla] generated the need for a local school. A privately owned school established in 1858 by John Spurgin was the first organised school in the area. It was a small building on the highway. A national school was established in 1861 in rented premises, enrolment being 41. However it wasn't till 1878 that the stone building on the present site, now used as the administration office was built, with residence attached. The architect for the building has not been definitively established, the design of the original sandstone building has been attributed to George Allen Mansfield, Schools Architect. (Further historical research from primary sources is recommended to confirm the architect of the building).

In 1925 enrolment was 58, by 1937 it had risen to 75.

After WW2 wooden portables were added as the enrolment by 1950 was 120. Ulladulla's centenary was celebrated in 1961, with visits by ex-students and teachers. Ex pupil, Mr John Mison, aged 90, assisted by his great granddaughter, Elaine Backhouse, planted a Silver Pittosporum tree.

By 1987, a staff of 24 teachers and 7 ancillary staff were necessary, with an enrolment of 560.

In 2000 the Government approved funds for 3.2 million dollars of building upgrade to be allocated. This saw the adaptive reuse of the original sandstone building as an administration area.

The school's student population reached its peak in 1999 with an enrolment of 810.

In 2001 the oval was extended to incorporate an area down towards Millard's Creek. In 2010 the Labour Government's BER (Building Education Revolution) spent 3 million dollars building 6 new permanent classrooms at the bottom of the school near the creek. As a result 7 demountables were made redundant and removed from the site.

In 2011 the school celebrated its sesquicentenary. Two trees were planted - one by the oldest living ex-student and one by one of the youngest. The school enrolment at this time was 635 including 3 special education classes.

In records held by the State Archives of NSW, correspondence in 1877 shows that the original court house building in Ulladulla was proposed to be converted into a school building. This proved unpopular with the local community, with the Council of Education backtracking and commissioning tenders for new buildings to be constructed (Figure 30). An Inspectors report (Figure 31) identifies the early dimensions of the school – the school room was to accommodate 50 pupils, it was to be constructed of “cobble stone (or brick), shingle roof”, and a teacher's residence was to include four rooms including a kitchen. A sketch of this plan was attached to the Inspector's Report (Figure 32).

Ulladulla
20th March 1877

Sir,

In reply to your letter of the 6th instant, I have the honor to inform you that a Meeting of the Ulladulla Public School Board was held today at which it was determined that the question of converting the Court House into a Public School be abandoned, as the local Magistrate is now of opinion that it would be inexpedient to recommend the vesting of the premises for the purpose named.

The local Board would therefore respectfully ask the Council of Education to be so good as to call for tenders for new Buildings as early as possible.

I have the honor to be
Sir,
Your obedient Servant
J. J. [Signature]
Hon Sec.

H. Williams Esq.
Secretary
Council of Education
Sydney.

Figure 30: Correspondence from Council of Education in 1877 highlighting the original plans to convert the court house building were to be scrapped, and that tenders were to be called for a new building. Source: State Archives NSW, 'Administrative File (2 bundles, A and B)', School Records 1876-1979, item no. [5/17928.1].

Note.—In cases where the portions of this Report in italics do not apply, they may be obliterated.

PUBLIC SCHOOL at Ulladulla

I advise that schoolroom accommodation should be provided for 50 pupils, in ONE department... [the estimated average number in each department being as follows:—

Boys
Girls

in accordance with the Model Plans in addition to the above, class-rooms will be necessary for 25 pupils.

A Teacher's residence, consisting of four rooms including Kitchen, is required, as shown on plan N° 10.

(No. of pupils in actual attendance 33 Boys, 18 Girls, 51 Total.
No. of pupils expected to attend 40 Boys, 25 Girls, 65 Total.

There is reason to believe that the population of the School district will be permanent, but not likely to increase.

The buildings should be constructed of rubble stone (or brick), shingle roof.

I estimate the cost, including out offices, sanitation shed, water supply, fencing and furniture, at £ 900.

The cost per child of the actual attendance is £ 57 or 17 13-0 nearly
The cost per child of the expected attendance is £ 65 or 13 17-0 nearly

Water should be supplied by means of an underground tank.

Fencing, to the extent of 72 rods, should be of the following description:— 3-rail fence round the playground, and also palings fence round garden area for teacher's use—say 25 rods.

On the back of this memorandum I have given a rough plan of the school site, showing the best position for the school buildings, closets, and tank [and Teacher's residence.]

D. Sheehan
Inspector of
South Coast District.
Office.

Figure 31: Inspector's Report for the new school at Ulladulla. Source: State Archives NSW, 'Administrative File (2 bundles, A and B)', School Records 1876-1979, item no. [5/17928.1].

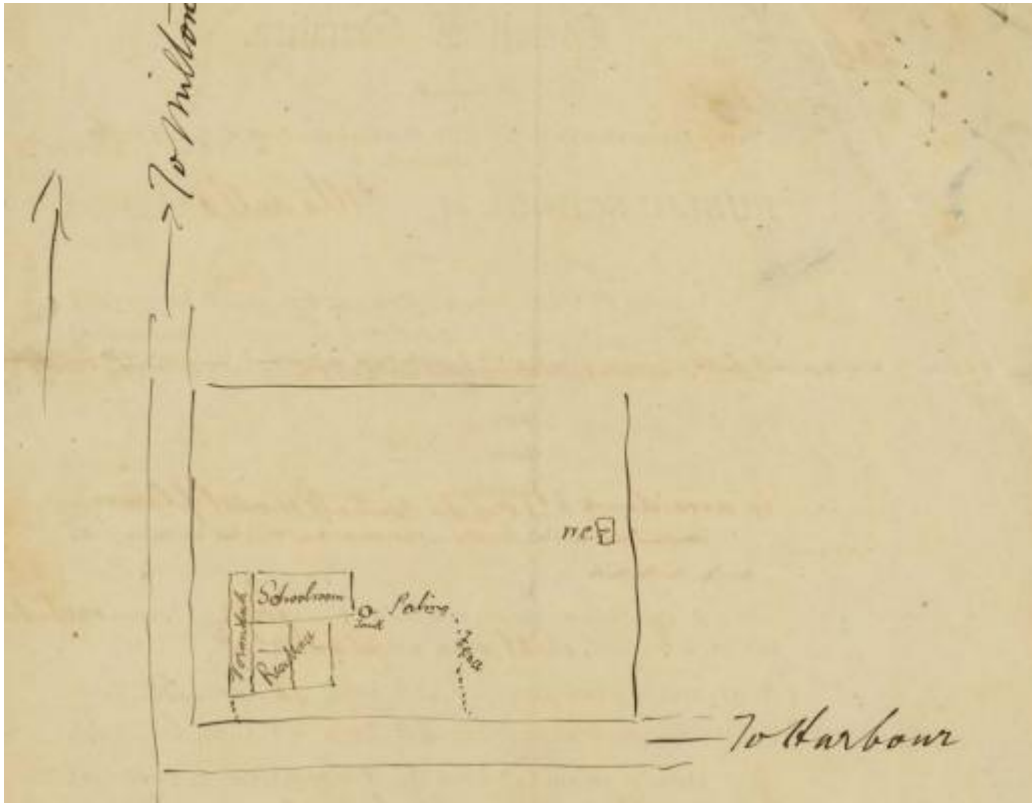


Figure 32: Sketch attached to Inspector's Report, showing planned residence, school room and fencing. Source: State Archives NSW, 'Administrative File (2 bundles, A and B)', School Records 1876-1979, item no. [5/17928.1].

In 1907, an extension was approved to the teacher's residence, with two additional rooms constructed (Figure 33).

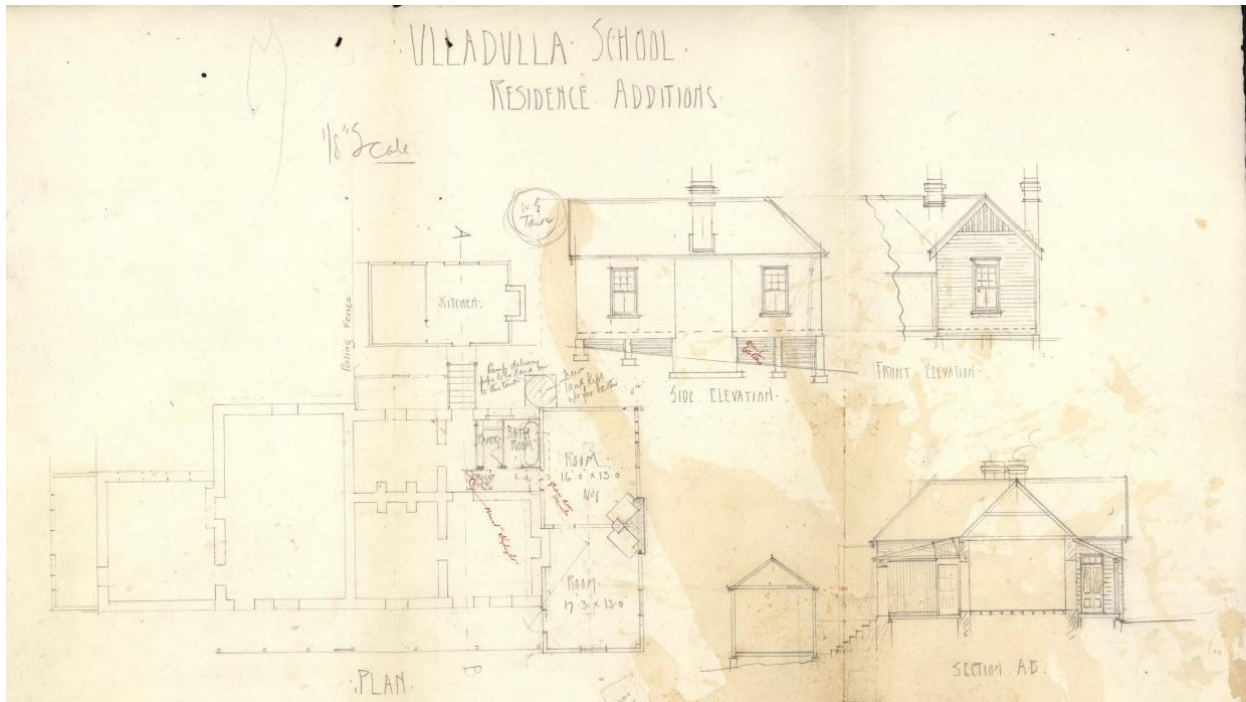


Figure 33: 1907 plans of additions at Ulladulla Public School residence. Source: State Archives NSW, 'Administrative File (2 bundles, A and B)', School Records 1876-1979, item no. [5/17928.1].

The following description of the school residence has been sourced from a letter or report from headmaster R.J. Woodhouse to chief inspector of schools dated 4 May 1936 (Figure 34):⁶

The residence is semi-detached and 60 years old with no modern conveniences of any kind, No structural alterations of any kind have been made, in fact the laundry is a disgrace to the Department, being built away from the house and the front wall of which is 6ft. 6ins. high... There is no departmental garage or shed of any kind and buildings are situated on 4sq. chains of land all the rest being playground...

Two rooms are very badly lighted due to the fact that the front verandah is too low. The floor of this verandah is rotting away. The kitchen leaks in heavy rain...

⁶ State Archives NSW, 'Administrative File (2 bundles, A and B)', School Records 1876-1979, item no. [5/17928.1].

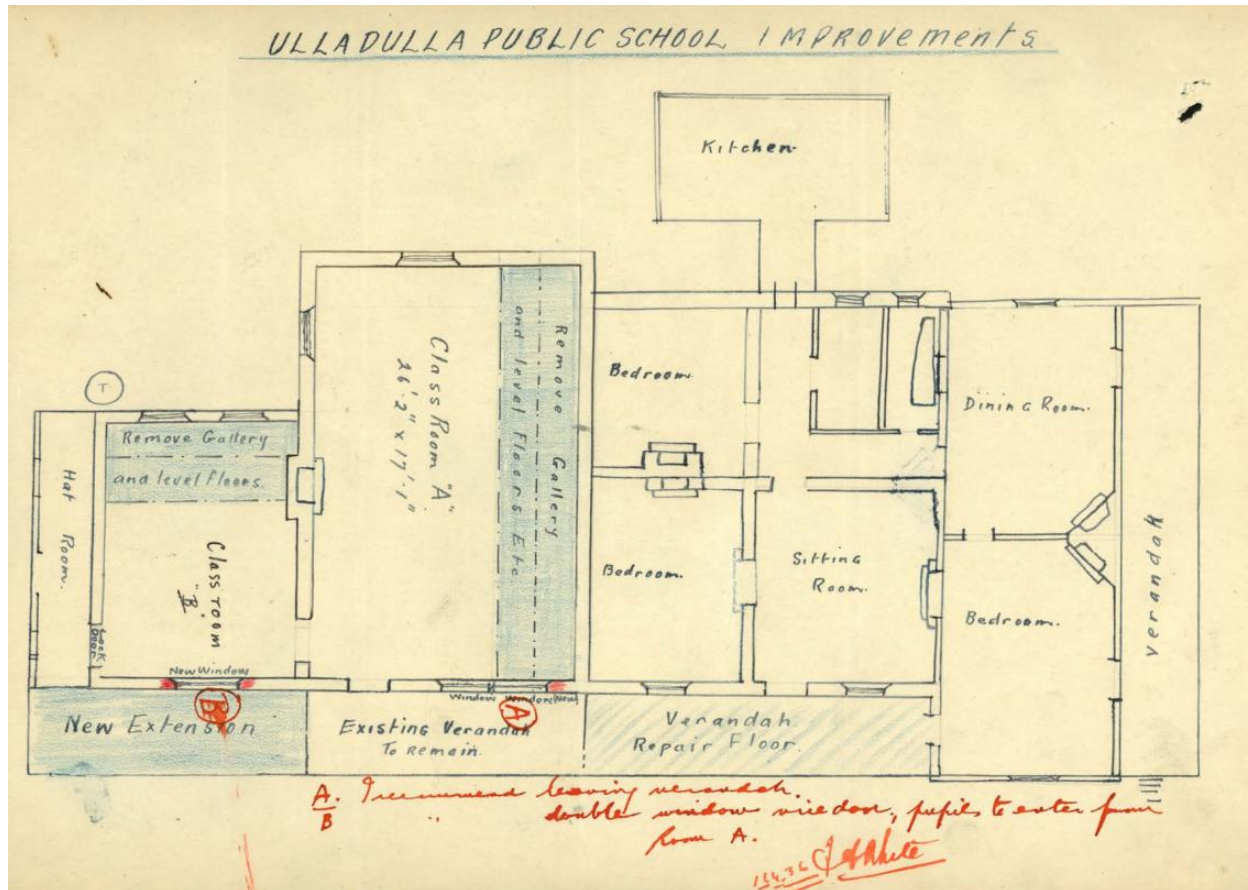


Figure 34: 1936 sketch of Ulladulla Public School residence. Source: State Archives NSW, 'Administrative File (2 bundles, A and B)', School Records 1876-1979, item no. [5/17928.1].

In 1962 approval was given for the '...erection of two new brick veneer primary classrooms, to new standards, together with any necessary additions to the toilet and ablution blocks, and other associated ancillaries...' However, it appears that the school could not find funds and it was decided to construct two classrooms '...in timber in lieu of brick veneer and erected as an extension to the existing timber building.' Approval was also given to erect a new combined toilet/ablution block.⁷

In 1963, the school was "...organised in 7 class groups. With only five classrooms available, one class has had to be accommodated in an unsatisfactory rented hall while other is housed in the school library. It is mentioned that the library has dimensions of only 26 ft. by 17 ft. and is located in a stone building approximately 100 years old and which is devoid of natural lighting."⁸

In 1964 a plumbing plant was installed on Millards Creek for the Ulladulla Public School.

⁷ State Archives NSW, 'Administrative File (2 bundles, A and B)', School Records 1876-1979, item no. [5/17928.1].

⁸ State Archives NSW, 'Additional Accommodation at Ulladulla Public School', 1963, M12820, B3302-9, Administrative file, School Records 1876-1979, item no. [14/7893].

Lot 1 DP 529425 (to the west, now occupied by sporting fields) was purchased in 1968. This was originally owned by Frederick Colin Fitch and Kevin Fitch, who requested \$22,500 for the allotment based on its subdivision potential. According to a letter from their solicitor to the Department of Education, the land, which was slightly over 4 acres and “mostly creek, swamp and quarry” was capable of 21 allotments (see sketches at Figure 35– Figure 36).

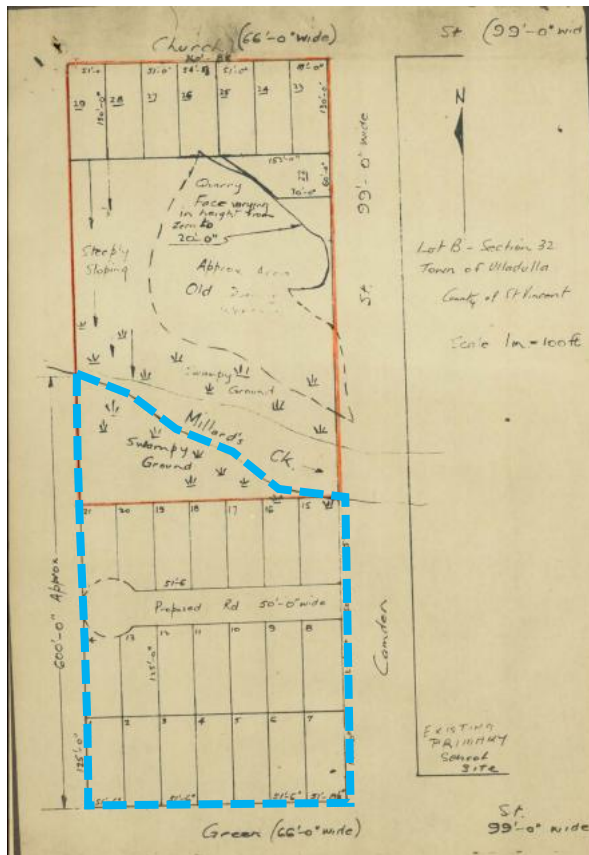


Figure 35: Sketch attached to correspondence between G S Lewis Solicitors and Department of Education, showing land to be purchased for the school (indicated in blue) was capable of residential subdivision.

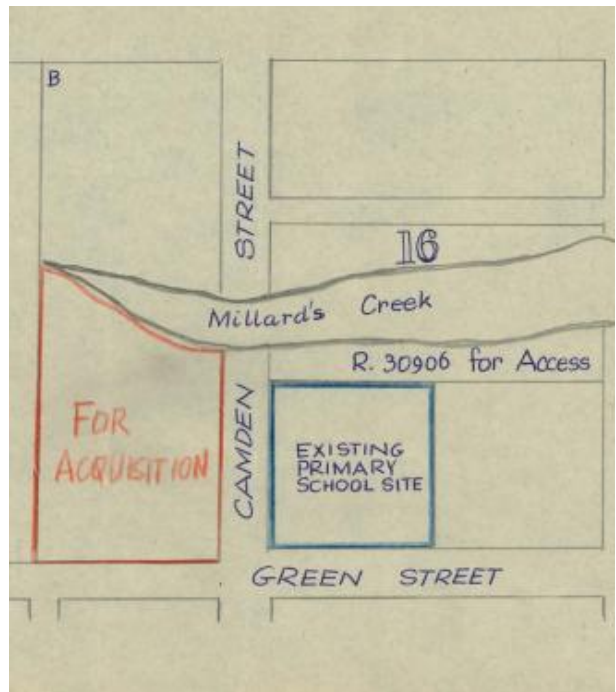


Figure 36: Sketch showing land acquired by the Crown in 1968 to extend Ulladulla Public School. It is noted that Camden Street was designated and not extended north of Green Street.

The earliest aerial image of the subject site dates back to 1959. Unfortunately, due to the quality of the image, it is difficult to identify school blocks and the schoolgrounds' layout (Figure 37). By 1979, several new blocks were erected, these likely associated with the 1960 works identified above (Figure 38). By 1987, the school site was further altered with more new structures erected (Figure 39). Further development of the school site is illustrated in Figure 40 and Figure 41, with a variety of additional teaching spaces erected by 2010. Further demountable buildings were erected on the site's western half in recent years.



Figure 37: 1959 aerial image showing approximate boundaries of the subject site (indicated in yellow). Source: NSW Government Historical Aerial Imagery.



Figure 38: 1979 aerial image showing approximate boundaries of the subject site (indicated in yellow). Source: NSW Government Historical Aerial Imagery.



Figure 39: 1987 aerial image showing approximate boundaries of the subject site (indicated in yellow). Source: NSW Government Historical Aerial Imagery.



Figure 40: 1997 aerial image showing approximate boundaries of the subject site (indicated in yellow). Source: NSW Government Historical Aerial Imagery.



Figure 41: 2010 aerial image showing approximate boundaries of the subject site (indicated in yellow). Source: Six Maps.

7. SITE SIGNIFICANCE

7.1. Basis for Assessment

In assessing the cultural significance of a place, it is necessary to adequately research and consider all the information relevant to an understanding of the place and its fabric. *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance, 2013* (Burra Charter) defines the cultural significance as being “aesthetic, historic, scientific or social value for past, present or future generations.”

The assessment of cultural significance is undertaken because it is necessary to understand the values of the subject lands before making decisions about the future of the subject site. This then leads to decisions that will manage, mitigate, or retain these heritage values in the future.

The ‘Statement of Significance’ indicates what heritage values of a place should be conserved and is used as a basis for the formulation of specific guidelines for the development of conservation policies of a place. *The Conservation Plan* by J. S. Kerr (seventh edition, 2013, published online by Australia ICOMOS), considers the following three criteria as a useful starting point in assessing the nature of significance:

- Ability to demonstrate a process, a custom or style
- Associational (historic) links for which there is or is not surviving physical evidence
- Formal or aesthetic qualities

7.2. Established Significance - Ulladulla Public School

The subject site (Ulladulla Public School) is identified as a heritage item ‘Victorian Georgian style Sandstone School and Schoolmaster’s Residence’, 241 Green Street, item no. 484 under Part 1 of Schedule 5 of the *Shoalhaven LEP 2014* having local significance.

The following statement of significance is extracted from the SHI form for ‘Victorian Georgian style Sandstone School and Schoolmaster’s Residence’:⁹

Rare early Victorian Georgian period school residence built as part of the first non-denominational school in the district. Altered and enlarged but original character retained. Considerable social and historical value to the local community. One of the few pre-1900 buildings at Ulladulla with a major streetscape contribution. Local significance (Shoalhaven).

8. ASSESSMENT OF HERITAGE IMPACT

In accordance with the known heritage values of Ulladulla Public School, the proposed works are subject to the heritage controls and policies contained within the *Shoalhaven LEP 2014*, *Shoalhaven DCP 2014* and the *SEPP (Transport and Infrastructure) 2021*. The impact of the proposed activity is assessed below in relation to their potential impact on heritage.

⁹ *NSW State Heritage Inventory*, ‘Victorian Georgian style Sandstone School and Schoolmaster’s Residence’, Item ID 2390616, available from: <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=2390616>.

8.1. Environmental Planning and Assessment (EP&A) Act 1979

The following provision contained within the *EP&A Act* is relevant to the subject proposal due to the site's listing as a heritage item.

5.5 Duty to consider environmental impact

(1) For the purposes of attaining the objects of this Act relating to the protection and enhancement of the environment, a determining authority in its consideration of an activity shall, notwithstanding any other provisions of this Act or the provisions of any other Act or any instrument made under this or any other Act, examine and take into account to the fullest extent possible all matters affecting or likely to affect the environment by reason of that activity.

Discussion

Though the area where the works are being undertaken are not within the curtilage of the heritage item 'Victorian Georgian style Sandstone School and Schoolmaster's Residence' (item 484), they are adjacent to the heritage item. As such, there is a duty for a Review of Environmental Factors (REF) to consider the impact of an activity on the environment as a whole, with this including an activity that is in proximity to a heritage item. This SOHI has identified that the proposed activity is not likely to have any physical or visual impacts to the Victorian Georgian style Sandstone School and Schoolmaster's Residence (item 484). This is due to the physical distance between the proposed location of the new school building / works and the heritage item itself, as well as the obstruction of any views between the two buildings by the school's existing building stock (Building D). No significant views or vistas of the heritage item will be obstructed by the proposal, and the new building will be in accordance with DoE standardised designs so as to not be a visually intrusive or dominant feature in the school.

The *EP&A Regulation 2021* further identifies requirements for assessing environmental impacts through an REF pathway, with the heritage considerations of this regulation extracted below.

8.2. Environmental Planning and Assessment (EP&A) Regulation 2021

The following regulations provide guidance for considering the potential environmental impact of a proposal.

171 Review of environmental factors – The Act, s5.10(a)

(1) When considering the likely impact of an activity on the environment, the determining authority must take into account the environmental factors specified in the environmental factors guidelines that apply to the activity.

(2) If there are no environmental factors guidelines in force, the determining authority must take into account the following environmental factors--

(e) The effects on any locality, place or building that has

(i) Aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific or social significance, or

(ii) Other special value for present or future generations.

Discussion

In determining environmental impact, the *EP&A Regulation 2021* identifies that various criteria of heritage significance are relevant for consideration. These are highlighted above in regulation 171 (2) (e). These significance considerations are mostly taken from the Heritage Council of NSW's significance assessment criteria.

The specific significance criteria that are relevant to the heritage significance of the 'Victorian Georgian style Sandstone School and Schoolmaster's Residence' heritage item are its historical, architectural and aesthetic significance. This is because as per the Statement of Significance (extracted at Section 7.2), the heritage item is significant for being one of the only pre-1900 buildings in the township that has a major streetscape contribution, having retained much of its original character. It is also identified as significant for its social and historical value to the community, being an operational school since the late 1870s.

It is considered that the aesthetic, architectural, historical and social significance of the heritage item will not be impacted by the proposed activity. This is due to the physical distance between the heritage building and the area proposed for the new homebase building within the schoolgrounds. The historical and aesthetic significance of the heritage item will not be compromised with the proposed activity, thus there is not environmental impact from a heritage perspective.

8.3. Shoalhaven LEP 2014

Note that the following heritage provisions contained within the Shoalhaven LEP 2014 are not binding on the proposed activity as it is going through an REF development pathway. Instead these have been included as a guide to frame the heritage impact assessment of the proposal.

Clause 5.10 Heritage Conservation

(2) Requirement for consent

Development consent is required for any of the following:

(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):

- (i) a heritage item,*
- (ii) an Aboriginal object,*
- (iii) a building, work, relic or tree within a heritage conservation area,*

...

(e) erecting a building on land-

- (i) on which a heritage item is located or that is within a heritage conservation area, or*

...

(4) Effect of proposed development on heritage significance

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).

(5) Heritage assessment

The consent authority may, before granting consent to any development—

- (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),

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.

(7) Archaeological sites

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 Heritage Act 1977 applies)—

- (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.

(8) Aboriginal places of heritage significance

The consent authority must, before granting consent under this clause to the carrying out of development in an Aboriginal place of heritage significance—

- (a) consider the effect of the proposed development on the heritage significance of the place and any Aboriginal object known or reasonably likely to be located at the place by means of an adequate investigation and assessment (which may involve consideration of a heritage impact statement), and

notify the local Aboriginal communities, in writing or in such other manner as may be appropriate, about the application and take into consideration any response received within 28 days after the notice is sent.

Discussion

The proposal involves the erection of a new two storey building with associated infrastructure and amenities within Ulladulla Public School. This would normally satisfy section 5.10 (2) (e) (i), however, as noted previously, only the eastern portion of the subject site (Lot 1 DP 122514 and Lot 3 DP 851748) contains the heritage item 'Victorian Georgian style Sandstone School and Schoolmaster's Residence'. As the proposal does not include any alterations to the heritage building itself, nor any works including erecting buildings on land that are within the heritage listed allotments, the proposed works are to be assessed for their potential heritage impact on heritage items in the vicinity, as outlined under section 5.10 (5) (c) of the *LEP*.

As per section 5.10 (5) (c), a heritage management document is required to assess the potential impact the proposed works would have on the heritage significance of the heritage item in the vicinity. This SOHI has therefore been prepared to accompany an internal REF planning approval pathway under Division 5.1 of the *EP&A Act*. It assesses the subject proposal in relation to its potential impact on the setting, use, views, fabric and appreciation of heritage items in the vicinity.

In general, it is concluded by CPH, that the proposal will have minimal impacts on the established heritage significance of the closest heritage item - 'Victorian Georgian style Sandstone School and Schoolmaster's Residence'. This is discussed further in section 8.6 of this report. Likewise, heritage items that are at a further distance away from the proposed new building, like item no. 492 (Sandstone weir) will not be visually impacted by the proposal.

The potential Aboriginal heritage significance for the site was assessed in the Preliminary Indigenous Heritage Assessment and Impact Report for Ulladulla Public School, prepared by Apex Archaeology in

November 2023. This report concluded that the majority of the study area is disturbed, with the modern footprint of the school and associated infrastructure likely to have destroyed or removed any preexisting Aboriginal archaeological signatures. There are no Aboriginal archaeological constraints to the development of this area.

8.4. Shoalhaven DCP 2014

Though acknowledged that the development of Ulladulla Public School will be investigated through a REF pathway, the following heritage controls within the *Shoalhaven DCP 2014* were considered relevant to consider as they provide guidance on what should be considered in an assessment of potential heritage impact.

Chapter 2: General and Environmental Considerations

3. European Heritage

3.1 Application

This section applies to heritage items and heritage conservation areas identified in the Shoalhaven LEP 2014.

3.2 Objectives

The objectives are to:

- (i) to ensure the significance of heritage items is identified and retained;*
- (ii) to ensure the special streetscape, pastoral or natural character of the conservation areas is maintained;*
- (iii) to ensure alterations and extensions to existing buildings respect those buildings and do not compromise the significance and character of the individual items or of the conservation areas;*
- (iv) to ensure new development respects its context and is sympathetic in terms of form, scale, bulk, fabric, colours and textures and does not mimic or adversely affect the significance of heritage items and conservation areas and their settings;*
- (v) to encourage a high quality of design for any new development in achieving compatibility with the heritage significance of individual heritage items and conservation areas;*
- (vi) To provide guidelines for assessment of demolition applications.*

...

3.3.3 Development in the Vicinity of a Heritage Item

Where development is to occur within the vicinity of a heritage item Council must make an assessment of the effect the carrying out of that development would have on the significance of the heritage item, its site and its setting. Such developments will need to provide a heritage impacted statement addressing the effect of the development.

...

3.3.5 Heritage Impact Statements

The key objective of your application is to provide clear information in drawings, text and photographs which will explain your intentions in the simplest way. Council is required to assess the impact of the proposed

works on the heritage significance of any heritage item or conservation area. This is best addressed in a Heritage Impact Statement as part of your development application.

The Heritage Impact Statement should be prepared in accordance with NSW Heritage Manual “Statements of Heritage Impact” and “Assessing Heritage Significance Guidelines” and the principles of The Burra Charter. It should include a Statement of Significance which is a concise summary of the cultural significance of a place and includes an assessment of aesthetic, historic, scenic and cultural values and comparative criteria. The Heritage Impact Statement should address:

- the history and development of the place*
- the fabric of the place in terms of its original configuration and later alterations*
- the cultural significance of the place*
- a description of the proposed works*
- an assessment of the impact of the proposed works on the cultural significance of the item or place*

Discussion

The above heritage controls of the DCP would normally confirm that a Statement of Heritage Impact (SOHI) is required to assess the potential heritage impacts caused by the development within the school complex. This SOHI has been prepared in accordance with the Department of Planning and Environment (DPE) publications, *Guidelines for preparing a Statement of Heritage Impact, 2023* and *Assessing Heritage Significance, 2023*. It is also guided by the philosophy and processes included in The Burra Charter: *The Australia ICOMOS Charter for Places of Cultural Significance, 2013* (Burra Charter). The assessment of the heritage impact is provided below at Section 8.6.

8.5. State Environmental Planning Policy (SEPP) (Transport and Infrastructure) 2021

Under Part 3.4 'Schools - specific development controls' of the SEPP (Transport and Infrastructure) 2021, there are various consent requirements for development works (including exempt development, complying development, development permitted with consent and development permitted without consent), however only those associated with heritage are considered below.

3.9 Consultation with councils – development with impacts on local heritage

1. This section applies to development carried out by or on behalf of a public authority if the development—

(a) is likely to affect the heritage significance of a local heritage item, or of a heritage conservation area, that is not also a State heritage item in a way that is more than minimal, and

(b) is development that this Chapter provides may be carried out without development consent.

2. A public authority, or a person acting on behalf of a public authority, must not carry out development to which this section applies unless the authority or the person has—

(a) had an assessment of the impact prepared, and

(b) given written notice of the intention to carry out the development, with a copy of the assessment and a scope of works, to the council for the area in which the local heritage item or heritage conservation area (or the relevant part of such an area) is located, and

(c) taken into consideration any response to the notice that is received from the council within 21 days after the notice is given.

Part 3.4 Schools – Specific Development Control

3.37 Schools—development permitted without consent

1. Development for any of the following purposes may be carried out by or on behalf of a public authority without development consent on land within the boundaries of an existing or approved school—

(a) construction, operation or maintenance, more than 5 metres from any property boundary with land in a residential zone and more than 1 metre from any property boundary with land in any other zone, of—

(iii) a permanent classroom that is not more than 2 storeys high to replace an existing portable classroom and that is used for substantially the same purpose as the portable classroom, or

(vi) a car park that is not more than 1 storey high,

(b) minor alterations or additions, such as—

(i) internal fitouts, or

(ii) alterations or additions to address work health and safety requirements or to provide access for people with a disability, or

(iii) alterations or additions to the external facade of a building that do not increase the building envelope (for example, porticos, balcony enclosures or covered walkways),

(d) security measures, including fencing, lighting and security cameras,

2. Subsection (1) applies only if the development does not require an alteration of traffic arrangements, for example, a new vehicular access point to the school or a change in location of an existing vehicular access point to the school.

3. Subsection (1)(a) applies only if the development does not result in a prohibited increase in student or staff numbers.

Discussion

This SOHI has been prepared to accompany a REF under Division 5.1 of the *EP&A Act 1979*. It has considered the potential heritage impacts of the proposed construction of the two storey homebase building and associated works within Ulladulla Public School.

The construction of the 2 storey homebase building above the existing carparking within the schoolgrounds is acceptable from a heritage perspective. The physical distance between it and the heritage-listed Block A building (approximately 100 metres) means that there will be no physical impacts to the heritage item's fabric or appearance. The two-storey height of the proposed building is too far away from the heritage item for it to overshadow it, and there are no clear sightlines between the two due to the obstruction of Block D (Hall and covered outdoor learning area - Cola) in between both sites. The design of the new homebase building is standard in accordance with the School Infrastructure Pattern Book, with no architectural features

or detailing proposed that attempts to mimic the significant aesthetic values of the heritage item. The scale of the proposed building is appropriate for the context of the school and the surrounding neighbourhood, with it not considered to be visually dominating or overwhelming to the amenity and visual qualities of the heritage item.

The proposal includes the removal of some trees concentrated in the area proposed for construction of the new homebase building. This area is slightly setback from the street and is visually separated from Green Street by cluster of mature trees that are to be retained. As part of the previous SRISI, CPH performed a desktop assessment of the trees that may have potential heritage or ecological significance based on their age and maturity, informed by aerial historical imagery. None of the trees proposed for removal were visible in the 1959 aerial imagery of the school, therefore the removal of these trees will have no impact on the established heritage values and visual qualities of the subject site. Likewise, none of the trees are registered as significant trees on the Shoalhaven LEP 2014, and no association with historical or commemorative events has been identified for the flagged trees. It is noted that some trees within the schoolgrounds may have Aborigicultural significance, with this to be informed by the arborist report.



Figure 42: Early Trees (indicated in yellow) within the subject site (marked in red). Area for proposed construction of new school block is indicated in green. Source: Overlay by City Plan Heritage over 1959 Aerial Imagery retrieved from NSW Historical Imagery Viewer (accessed November 2023).

The proposed activity will continue to maintain the characteristics of the school and not have any adverse effect on the appreciation and usage of the heritage item on site, nor on its amenity or visual setting. This is due to the physical distance between the area proposed for the new homebase building and the existing heritage item. The lack of any clear sightlines between the two sites due to existing building stock within the school is also a factor that contributes to the proposal being assessed as having no heritage impact. This is also true for the sandstone weir heritage item to the north (item 92), which is further away and obstructed by trees along Millards Creek.

The design qualities principles at Schedule 8 of the *SEPP (Transport and Infrastructure) 2021* would need to be referred to when undertaking the development permitted with consent pathway. The most relevant principle of Schedule 8 is that of Principle 1 - context, built form and landscape:

Schools should be designed to respond to and enhance the positive qualities of their setting, landscape and heritage, including Aboriginal cultural heritage. The design and spatial organisation of buildings and the spaces between them should be informed by site conditions such as topography, orientation and climate.

It is concluded that the proposed works are respectful to heritage item within the subject site as they have been designed to utilise contemporary materials that are sympathetic to the aesthetic values of the heritage buildings. In addition to the design of the building, the placement of the new building away from Block A is also a factor that is sympathetic to the heritage values of the heritage item.

8.6. Potential Heritage Impact: Matters for Consideration

The following 'Matters for consideration' are provided in the Department of Planning and Environment publication, *Guidelines for preparing a Statement of Heritage Impact, 2023*.

Do the proposed works include removal of unsympathetic alterations and additions? How does this benefit or impact the heritage item and its significance?

- The proposed works do not physically affect the heritage listed Block A building within the subject site, nor are they within the heritage-listed allotments within the school. Additionally, due to the established landscape and setting, along with the scale of proposed new development, there will be no impact on the established aesthetic values of the heritage items in proximity (item no. 484 and 92 on the *Shoalhaven LEP 2014*).

Do the proposed works affect the setting of the heritage item, including views and vistas to and from the heritage item and/or a cultural landscape in which it is sited? Can the impacts be avoided and/or mitigated?

- As noted above, due to the established landscape and setting along with the school, no visual impact is anticipated on the established heritage values of the heritage items in proximity ('Victorian Georgian style Sandstone School and Schoolmaster's Residence', item 484, and 'Sandstone weir', item 92).

Are the proposed works part of a broader scope of works?

Does this proposal relate to any previous or future works? If so, what cumulative impact (positive and/or adverse) will these works have on the heritage significance of the item?

- The proposed works are limited to the construction of a new two-storey building and associated landscaping.

Are the proposed works to a heritage item that is also significant for its Aboriginal cultural heritage values? If so, have experts in Aboriginal cultural heritage been consulted?

Has the applicant checked if any other approvals or a separate process to evaluate the potential for impacts is required?

- Based on the *Preliminary Indigenous Heritage Assessment and Impact Report for Ulladulla Public School and Aboriginal Archaeological Due Diligence*, both prepared by Apex Archaeology (2023) the majority of the study area is disturbed, with the modern footprint of the school and associated infrastructure likely to have destroyed or removed any pre-existing Aboriginal archaeological signatures. There are no Aboriginal archaeological constraints to the development of this area.

Do the proposed works trigger a change of use classification under the National construction code that may result in prescriptive building requirements? If so, have options that avoid impact on the heritage values been investigated?

- Not applicable.

If the proposed works are to a local heritage item, are the requirements of the development control plans or any local design guidelines that may apply to the site considered?

- The controls of the *Shoalhaven DCP 2014* have been considered and addressed in detail in Section 8.4 - Shoalhaven DCP 2014, though they are not binding given the proposed activity will be assessed through an internal REF pathway.

Will the proposed works result in adverse heritage impact? If so, how will this be avoided, minimised or mitigated?

- As discussed above, there will be no physical or visual impacts by the proposed development on the heritage values of the adjacent heritage item. This is because the heritage item is physically distanced from the area proposed for the construction of the new homebase building, with no direct sightlines due to the existence of Building F in between the two sites.

8.7. Mitigation Measures

As a result of the above assessment of the potential heritage impact of the proposed activity, there are no mitigation measures required from a heritage perspective. This SOHI has assessed that the proposal will have no impact on the heritage significance of the heritage item on site. The 'Victorian Georgian style Sandstone School and Schoolmaster's Residence' (item no. 484 on the *Shoalhaven LEP 2014*) and 'Ulladulla Public School – Building B00A' (listed on the Department of Education Section 170 Heritage Conservation Register) will retain their heritage values.

9. CONCLUSION AND EVALUATION OF ENVIRONMENTAL IMPACTS

In conclusion, it is considered by City Plan Heritage that:

1. The extent and nature of potential impacts are low and will not have a significant impact on the heritage locality, community and environment.
2. There are no mitigation measures applicable to the proposal that need to be implemented as the proposed works have no identified heritage impacts.

The proposal has no physical impacts to the 'Victorian Georgian style Sandstone School and Schoolmaster's Residence' (item no. 484 on the *Shoalhaven LEP 2014*), with the proposed location for the new school building sufficiently distanced away from the heritage listed building. There are also no visual

impacts on the heritage item as there exists no sightlines between the item and the proposed location due to the school's existing building stock. As a result, the new homebase building was assessed as having no visual or physical impact on the school's heritage item.

The development will also have no visual impacts on any heritage items in the vicinity of the school due to the distance away and lack of clear sightlines to the heritage item.

Yours Sincerely,



Kerime Danis
Director - Heritage