

European Heritage Impact Assessments Summary Report of Initial Site Investigations for the upgrade of Vincentia High School 142 The Wool Road, Vincentia NSW 2540

Prepared for:



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Acronyms and Abbreviations

The following acronyms are used in this section.

Acronym	Description	
ACHAR	Aboriginal Cultural Heritage Assessment Report	
AHIMS	Aboriginal Heritage Information Management System	
APZ	Asset Protection Zone	
DCP	Development Control Plan	
DPE	Department of Planning and Environment	
НСА	Heritage Conservation Area	
LEP	Local Environmental Plan	
LGA	Local Government Area	
PAD	Potential Archaeological Deposits	
REF	Review of Environmental Factors	
SEPP	State Environmental Planning Policy	
SOHI	Statement of Heritage Impact	
SRISI	Summary Report of Initial Site Investigations	

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EXECUTIVE SUMMARY

City Plan Heritage were engaged by the NSW Department of Education (DoE) to prepare a Summary Report of Initial Site Investigation (SRISI) that specifically considered the European Heritage of Vincentia High School at 142 The Wool Road, Vincentia, NSW 2540 (subject site) to guide future development opportunities and constraints for the site. Specifically, DoE required an investigation into the future upgrades of the school.

This SRISI previously addressed a Feasibility Study prepared by NBRS (Rev 3 dated 20.07.23). This updated SRISI addresses the finalised drawings prepared by Fulton Trotter Architects (Rev 07 dated 10.01.2025), which will be used to support a Review of Environmental Factors (REF) for the DoE to upgrade Vincentia High School (the activity).

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*.

This SRISI has been prepared in accordance with the *Guidelines for Division 5.1 assessments* (the Guidelines) by the Department of Planning, Housing and Infrastructure (DPHI). The purpose of this updated report is to confirm whether the updated design impacts the proximate heritage items.

Vincentia High School is not listed as a heritage item under Part 1 of Schedule 5 of the *Shoalhaven Local Environmental Plan (LEP)* 2014, nor is it located within a Heritage Conservation Area. No buildings within Vincentia High School nor the school site itself have been assessed in this desktop SRISI as having potential for heritage significance. The proposed activity is however located in proximity to the heritage item 'Colonial road—remnants (former Wool Road)', item no. 218 listed under Part 1 of Schedule 5 of the *Shoalhaven LEP* 2014. Based on the proposed activity, there will be no impacts to this proximate heritage. This is because the activity is sufficiently distanced away from the heritage item (which are road remnants within the roadway). There are no identified significant views of the heritage item (being road remnants) and so there is no potential for the proposed activity to visually impact the heritage item

It is considered by City Plan Heritage that:

- 1. The extent and nature of potential heritage impacts from the proposed activity is minimal, and it will not 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.

No further heritage assessment is required to assess potential heritage impact of the proposed activity.

1 INTRODUCTION AND BACKGROUND

1.1 Background

City Plan Heritage (CPH) were engaged by the NSW Department of Education (DoE) to prepare a Summary Report of Initial Site Investigation (SRISI) which will be used to support a Review of Environmental Factors (REF) for the DoE for upgrades to Vincentia High School (the activity).

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*.

This SRISI has been prepared in accordance with the *Guidelines for Division 5.1 assessments* (the Guidelines) by the Department of Planning, Housing and Infrastructure (DPHI). The purpose of this updated report is to confirm whether the updated design impacts the proximate heritage items.

1.2 Site Background

1.2.1 Site Location

Vincentia High School is located at 142 The Wool Road, Vincentia, NSW, 2540 and has an approximate site area of 8.09 hectares. The site is comprised of two lots, legally referred to as Lot 1 Deposited Plan P809057 and Lot 1 Deposited Plan 550361 and is located within the Shoalhaven City Local Government Area (LGA). (Figure 1). A cadastral map of the site is provided at Figure 1.



For a more detailed description of the site and its surrounding context, see Section 2.0.

Figure 1: Cadastral map of the two parts of the subject site within surrounding context. Source: SIX Maps, accessed September 2023.

1.2.2 Legal Description

The subject site occupied by Vincentia High School comprises Lot 1 DP 809057 and Lot 1 DP 550361 as described on the records held by the NSW Land & Registry Services (Figure 2).



Figure 2: Aerial view of the subject site showing Lot 1 DP 809057 (indicated in red) and Lot 1 DP 550361 (indicated in blue). Source: Near Maps (2023 imagery).

1.2.3 Heritage Listing

The existing Vincentia High School is not listed as a heritage item under Part 1 of Schedule 5 of the *Shoalhaven Local Environmental Plan (LEP)* 2014, nor is it located within a Heritage Conservation Area.

The subject site is however in proximity to the following heritage item of local heritage significance:

Environmental Planning and Assessment Act, 1979

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

 'Colonial road—remnants (former Wool Road)', D3164 and D3200 Princes Highway and The Wool Road, item no. 218¹

¹ *NSW State Heritage Inventory*, 'Colonial Road – remnants (former Wool Road)', Item ID. 2390254, available from: https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=2390254.



Figure 3: Heritage Map of Vincentia, showing the school site at 142 The Wool Road (indicated in red) and the surrounding heritage context. Source: Shoalhaven LEP 2014, Heritage Map – Sheet HER_020C and HER_020D.

1.3 The Proposal

The proposed activity relates to upgrades to Vincentia High School. Specifically, the proposed activity comprises the following:

- Construction of a new two-storey homebase building.
- Installation of solar panels.
- Construction of new stairs and covered walkways.
- Internal road upgrade which involves providing a new drop off zone, parking spaces and pedestrian pathway.
- Relocation of existing shade structure.
- External landscape works.
- Tree removal.

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

The following drawings from Fulton Trotter Architects have been utilised in the Heritage Impact Assessment (Section 6).

Fulton Trotter Architects					
Date	Title	Drawing No	Revision		
25.03.2025	Cover Sheet + Drawing List	DR A 0000	08		
25.03.2025	Specifications Schedule & Material Selection	DR A 0001	05		
25.03.2025	Existing Site Plan 01	DR A 1001	10		
25.03.2025	Existing Site Plan 02	DR A 1002	10		
25.03.2025	Site Analysis Plan	DR A 1003	05		
25.03.2025	Proposed Site Plan 01	DR A 1101	11		
25.03.2025	Proposed Site Plan 02	DR A 1102	10		
25.03.2025	Site Sections	DR A 1201	10		
25.03.2025	Shadow Diagrams	DR A 1301	05		
25.03.2025	Shadow Diagrams	DR A 1302	05		
25.03.2025	External Works Plan 01	DR A 1401	04		

25.03.2025	Staging Plan 01	DR A 1501	08
25.03.2025	Staging Plan 02	DR A 1502	08
25.03.2025	Playspace Calculation	DR A 1601	08
25.03.2025	Proposed Amenities Strategy	DR A 1602	08
25.03.2025	Indigenous Artwork Strategy	DR A 1604	08
25.03.2025	Proposed Level 1 Floor Plan	DR A 2102	12
25.03.2025	Proposed Level 1 Ceiling Plan	DR A 2202	07
25.03.2025	Proposed Ground Floor Plan	DR A 2101	12
25.03.2025	Proposed Ground Ceiling Plan	DR A 2201	07
25.03.2025	Proposed Roof Plan	DR A 2103	12
25.03.2025	Proposed Elevations	DR A 3201	07
25.03.2025	Proposed Elevations	DR A 3202	07
25.03.2025	Proposed Sections	DR A 3301	07
25.03.2025	Façade Strategy	DR A 3401	10
25.03.2025	External Materials and Finishes	DR A 3402	06
25.03.2025	External Wall Type Details	DR A 4001	07
25.03.2025	Internal Wall Type Details	DR A 4002	07
25.03.2025	Typical Detail Section 01	DR A 4201	07
25.03.2025	Typical Detail Section 02	DR A 4202	07
25.03.2025	Stair & Ramp Details	DR A 4401	04
25.03.2025	Handrail & Balustrade Details	DR A 4501	04
25.03.2025	Typical Covered Walkway Details	DR A 4801	05
25.03.2025	Typical Fascia Details	DR A 4901	05
25.03.2025	External Door & Window Schedule	DR A 6001	04
25.03.2025	Internal Door & Window Schedule	DR A 6002	04
25.03.2025	Perspectives 01	DR A 9001	08

1.4 Limitations

The following limitations have been identified in relation to this desktop feasibility report.

- A detailed historical archaeological assessment is not within the scope of this report. An assessment
 of Aboriginal cultural heritage values is also not within the scope of this report as it was investigated
 by Apex Archaeology.
- Historical research is based only on a desktop assessment and limited to the resources readily available through online platforms. Thus, the assessment is solely based on the primary and secondary resources readily available online, including Old Land Title records, general histories, historical aerial imagery, and online mapping platforms.
- The subject site was not inspected by CPH, instead relying upon site photographs undertaken by NBRS on 8 July 2024 to inform their understanding of the school and its surrounding heritage context.

2 SITE CONTEXT AND DESCRIPTION

2.1 Site Context

The subject site is located within the township of Vincentia, a suburb of the Shoalhaven Local Government Area (LGA). Vincentia is located approximately 25km southeast of Nowra and approximately 200km south of the Sydney CBD. The site is located within the bushland reserve of Jervis Bay National Park. The Bay and Basin Leisure Centre is located to the north directly opposite the school on The Wool Road.

The following images provide an overview of the site's context (Figure 4 - Figure 6).



Figure 4: Bay and Basin Leisure Centre, looking north-west from The Wool Road. Source: Google Street View (April 2018) accessed September 2023.



Figure 5: General view of The Wool Road, looking east, showing the subject site (right). Source: Google Street View (April 2018) accessed September 2023.



Figure 6: View facing north-east of the Home Co. Vincentia Shopping Centre, located approximately 600 metres north-west of the school. Source: Google Street View (April 2023), accessed September 2023.

2.2 Site Description

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 Vincentia High School. Vincentia High School currently includes 49 permanent teaching spaces (PTS) and 17 demountable teaching spaces (DTS). The eastern portion of the site contains natural bushland.

The site is an irregularly shaped lot. Vehicle access is provided to The Wool Road via a driveway that connects to a signalised intersection. There is a footpath and cycleway along The Wool Road. The surrounding land consists of extensive natural bushland (Jervis Bay National Park).

The following images provide an overview of the site (Figure 7 – Figure 10).



Figure 7: View of the sports oval within Vincentia High School.



Figure 8: View of the games court within Vincentia High School.



Figure 9: View of demountable buildings, as well as Building H within Vincentia High School.



Figure 10: View of Building A within Vincentia High School.



Figure 11: Existing site plan for Vicentia High School prepared by NBRS. Source: Vincentia High School Upgrade Study, 2023.



Figure 12: Proposed site plan for Vincentia High School, showing location of the proposed building. Source: Fulton Trotter Architects.

3 LITERATURE REVIEW

There have been no previous studies or reports that could be provided or found during this desktop review. However, the following resources have been consulted and researched as part of this report:

- Heritage NSW State Heritage Inventory (SHI) database
- Shoalhaven Local Environmental Plan (LEP) 2014
- Shoalhaven Development Control Plan (DCP) 2014
- Shoalhaven City Council website
- NSW State Archives
- NSW Government Historical Aerial Imagery
- Heritage NSW Aboriginal Heritage Information Management System (AHIMS) database
- SIX Maps
- NSW Land Registry Services
- Australian Dictionary of Biography and various online newspapers

4 SITE HISTORY

4.1 Indigenous History

The following Aboriginal history has been extracted from the Wreck Bay Aboriginal Community Council website:²

The best description of the Aborigines of this era is provided by the Frenchman, Jules Sebastian Cesar Dumont d'Urville who visited Jervis Bay for a few days in November 1826 with a party of sailors, soldiers, naturalists and artists aboard the corvette, Astrolabe. He observed that the natives were of the same type as those from Port Jackson but better looking and stronger, possibly because of the abundance of food. He noted that several of them had a "tattoo of scars on their backs, the cartilage of the nosed pierced and their hair parted into strands decorated with Kangaroo teeth or paws". The French visitors entertained the Aborigines by bringing in a huge catch of fish from a single cast of a net. In his journal d'Urville also described two huts which were located near the party's observatory, as follows: "In form they were like an oblong beehive about six or seven feet high, built in wide strips of eucalyptus bark, set upright and brought together at the top, covered with grass and marine plants. Clean and spacious inside, each of them could easily house a family of eight to ten individuals and evidence a degree of intelligence on the part of these savages superior to any I had so far encountered."

When they visited the coast, the Aboriginal men and youths looked for rocks overhanging the water's edge and from this platform they would spear any fish lured to the area by morsels of shellfish scattered by the hunter. Their long, light fishing spears were constructed from several flower stalks from the grass tree, spliced together with bands of sinew and water proofed with an insoluble resin obtained from the same plant. The several hardwood prongs on these fishing spears were armed with needle sharp bone splinters firmly bound and water proofed in the same way.

While the men were hunting the women and children hunted small game, collected fruits, berries and nuts and dug for various root vegetables with a strong stick. Captain Cook sighted the Bay in April 1770 while sailing north along the coast, [sic] In his diary he wrote of a point of land which I had discovered on St George's Day and which therefore I called Cape George (Cape St George). While in the vicinity Cook noted 'smoke in several places near the beach' [sic] Arriving at the Bay he recorded that it 'promised shelter from the north east winds, but the wind was with us, it was not in my power to look into it without beating up, which would have cost me more time that I was willing to spare'. He named the northern point of the bay 'Long Nose', the whole resembled a face in profile.

The bay became 'Jervis Bay' in August 1791 when Lieutenant Richard Bowen, named it Port Jervis after naval officer and later, admiral of the British fleet, Sir John Jervis under whom Bowen had served. Whalers from Twofold Bay began to frequent Jervis Bay in the 1790's using it for anchorage.

In 1801 naturalist and explorer George Caley arrived aboard Lieutenant James Grant's ship 'Lady Nelson' and between them they made favourable reports of the flora, fauna and safety of the harbour. Governor Macquarie landed on Bowen Island in 1811 and subsequently recommended a settlement at the Bay. In 1818 he sent explorers Charles

² Wreck Bay Aboriginal Community Council, 'Aborigines of Jervis Bay', accessed September 2023 from: https://www.wbacc.gov.au/aborigines-of-jervis-bay/.

Throsby and Hamilton Hume to seek a route from the southern tablelands to Jervis Bay. Throsby completed the journey. In 1819 the surveyor-general John Oxley sailed to the Bay. He reported that there was not 'the smallest inducement for the foundation of a settlement on its shores, being for the most part Barren and generally deficient in Water'.



Figure 13: Map of Indigenous Australia, with approximate location of Vicentia indicated in blue. This appears to be on the borders of land occupied by the Dharawal and Yuin nations. 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.

There were no Aboriginal sites or places identified within the footprint of the subject site or within a 200m buffer zone around the school (based on the general information generated by the Aboriginal Heritage Information Management System – AHIMS). However, five (5) Aboriginal sites are identified within a 1 km buffer around the subject site. The lack of any identified sites within the grounds of the likely reflects the fact that the study area has not been subject to any detailed archaeological investigations, rather than indicating that there is no Aboriginal archaeology present on the study area.

4.2 History of Vincentia

The following history of the Jervis Bay area has been extracted from the Wreck Bay Aboriginal Community Council website:³

The first land grants were issued in 1827. It was the cedar in the area that provided the initial industry though dairying soon developed. When wool prices soared at the outset of the 1840's Governor Gipps sent 70 convicts to cut a track that has become known as the Wool Road from Braidwood to the Bay so that wool could be shipped to Sydney. As a result there was great optimism about the future of the district...

Vincentia was originally known as South Huskisson and The Old Township. It was established on the original 2,560-acre land grant issued to Edward Deas Thomson in 1830. In 1841 Edward Deas Thomson founded a

³ Ibid.

private township. The land was subdivided and "every one of 100 lots offered was sold by auction in a couple of hours, the total realising £3,519, at an average of 117/6/-per acre."⁴ The township was originally set up to become a shipping port for the wool from Braidwood. Soon after, another subdivision of 100 lots was put up for auction, with "a hotel built, licenced and opened for public accommodation, and a wool store erected, capable of storing 2,000 bales."⁵

Soon after this subdivision, a road from Nerriga to the newly established port was built. It appears, the town was successful with several early settlers such as Colonel Mackenzie using the port for wool transportation. The road that connected the Jervis Bay port with Nerriga and Braidwood would later become known as The Wool Road in commemoration of its historic usage.

In addition to whaling vessels and smaller craft, steamers, such as Sophia Jane and Tamar, ran regular trips to Jervis Bay via Wollongong. However, when the railway was extended to Goulburn allowing easier transportation of wool from Braidwood, the settlement at Jervis Bay was abandoned. By 1885, the former settlement was in ruins "...the largest being that of an extensive brick-built public house. A few gigantic pines remain as evidence of former cultivation."⁶

The following description of the township has been extracted from an article published in 1931 in the *Sydney Mail*:⁷

The actual site of the old township, where formerly there stood a substantial hotel, a commodious wool store, and many other buildings, is now represented by a mass of weed-covered mounds of building material, whilst the bush has totally obliterated all signs of anything resembling a township. One solitary Norfolk Island pine rears its lofty head amongst its humbler brethren, as though disdaining the association that it has been compelled to put up with for all those years. There are no signs of a wharf or landing-place, and over the place broods a desolation that can be almost seen as well as felt. The old wool-road, in the construction of which men laboured in chains, has almost vanished and degenerated into a cart track, and it is many a long day since the creaking drays, with their valuable loads, descended from the high lands and discharged their cargo at this old, forgotten township.

In 1952 the Vincentia township was established by landowner Henry Halloran. In a September 1952 article in the *South Coast Times and Wollongong Argus*, Mr Halloran offered to finance half the costs of construction of a road to his recent subdivision of "*Vincentia, South Huskisson*."⁸ This road would be constructed by late 1953 and early 1954, and advertisements for the sale of allotments at Vincentia were commonplace in Sydney newspapers like that of *The Sun* (Figure 14 and Figure 15).

⁴ Sydney Mail, 'Jervis Bay: An Old Settlement', 20 May 1931, p. 50, available from:

https://trove.nla.gov.au/newspaper/article/159791273.

⁵ Ibid.

⁶ Australian Town and Country Journal, 'Jervis Bay', 31 October 1885, p. 28, available from:

https://trove.nla.gov.au/newspaper/article/70985803/5046354

⁷ Above n 4.

⁸ South Coast Times and Wollongong Argus, 'Now Council May Reject Road Finance Offer', 15 September 1952, p. 5, available from: https://trove.nla.gov.au/newspaper/article/143096676.



Figure 14: Advertisement for new land allotments at Vincentia. Source: The Sun, 'Advertising', 7 October 1953, p. 19, available from: https://trove.nla.gov.au/newspaper/article/230749966.



Figure 15: Advertisement for new land allotments at Vincentia. Source: The Sun, 'Advertising', 6 January 1954, p. 13, available from: https://trove.nla.gov.au/newspaper/article/231328501.

4.3 History of Vincentia High School

The existing town of Vincentia was previously called South Huskisson. It was established on the original 2,560acre land grant issued to Edward Deas Thomson in 1830 (Serial 34 Page No 61). In 1841, the entire estate was sold to George Kenyon Holden and William Macpherson (Book Z Page No 633). Part of the land was subdivided and sold or leased to different purchasers; however, the area where the school would be designated would remain unsubdivided at that time (see Figure 16). In 1922, 1,789 acres 11 perches of land were transferred to the Perpetual Trustee Company Ltd (Volume 3357 Folio 106). In 1927 part of the land was resumed for public roads (Volume 3964 Folio 241). In 1972 the site was resumed by the Crown for high school purposes (Figure 18).



Figure 16: Undated map of Bherwerre, County of St Vincent, Land District of Nowra, Eastern Division NSW, fourth edition showing the approximate location of the subject site (indicated with red star). Source: NSW Land Registry Services Historical Land Records Viewer ('NSW LRS HLRV'), AO Map 44602.



Figure 17: Undated map of Parish of Bherwerre, County of St Vincent showing approximate location of the subject site (circled in yellow). Source: NSW LRS HLRV.



Figure 18: Undated map of Parish of Bherwerre, County of St Vincent, showing location of the subject site (indicated in yellow). The note number 19 indicates the land was resumed for a high school in 1972. Source: NSW LRS HLRV.

As shown in the available historical aerial images, the subject site remained undeveloped in 1987 (Figure 19), except for a small track that led from The Wool Road. The school would be officially established in 1993, with the construction works captured in the 1993 aerial imagery. The site featured Blocks A, B and C, several presumably demountable buildings, carparking and sport grounds (Figure 20). By 1997, the subject site was further developed. Several demountable buildings were demolished and Blocks H, J, F, K, D, G, E, L and I were erected (Figure 21). By 2011, the site was further developed into with the construction of Blocks N, M and several more demountable buildings (Figure 22).



Figure 19: 1987 aerial image showing approximate location of the subject site (circled in yellow) with no development on site. Source: NSW Government Historical Aerial Imagery, 1987.



Figure 20: 1993 aerial image showing the school under construction. The approximate modern boundary of the school is indicated in red. Source: NSW Government Historical Aerial Imagery, 1993.



Figure 21: 1997 aerial image showing the school extensively developed. Source: NSW Government Historical Aerial Imagery, 1997.



Figure 22: 2011 aerial image showing Vincentia High School, with Blocks M and N erected in the 2000s. Source: SIX Maps, 2011.

5 SITE SIGNIFICANCE

5.1 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.

The subject site Vincentia High School is not listed as a heritage item under the *Shoalhaven LEP* 2014, nor is it listed on the Section 170 Department of Education Conservation Register. As such, there are no existing or relevant Statements of Significance for the site.

As there are no known previous heritage significance assessments or Conservation Management Plans/Strategies (CMP or CMS) for the subject site, the following assessment of significance for the subject site has been prepared by City Plan Heritage. This assessment addresses the criteria endorsed by the Heritage Council of NSW and is in accordance with the State of NSW and Department of Planning and Environment (DPE) *Assessing Heritage Significance* 2023 guidelines.

It is important to consider that the following assessment is based on the desktop resources, including Old Land Title records, general histories, historical aerial imagery, and online mapping platforms. The subject site would require a site inspection to confirm the information gathered from these online resources.

5.2 Assessment of Significance Criteria

Criterion (a) Historic Significance: 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).

The subject site does not possess any strong historical significance. For much of its history, the site remained bushland and within the Jervis Bay National Park. The land on which the school would be constructed was first acquired by the Crown in 1972; however, construction of the school did not occur until 1992-1993.

The site does not meet the criterion in this regard.

Criterion (b) Historical Association: an item has strong or special associations 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).

There is no historical association with Vincentia High School. There are no known significant figures associated with the construction of the school, nor with its operation over the last 30 years.

The site does not meet the criterion in this regard.

Criterion (c) Aesthetic/creative/technical achievement: an item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (or the local area).

The subject site does not possess aesthetic, creative, or technical significance. The oldest surviving structures on site are 1993 school classroom buildings (A, B and C), which do not appear to display any distinctive architectural creativity or technique.

The site does not meet the criteria in this regard.

Criterion (d) Social, cultural, and spiritual: 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.

There is no known social significance associated with Vincentia High School. Consultation with the local Vincentia community would inform the social significance of the site, if any.

The site does not meet the criterion in this regard.

Criterion (e) Research potential: 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).

There is not likely to be potential for research significance for the site due to the site's limited archaeological potential (as informed by Apex Archaeology).

The site does not meet the criterion in this regard.

Criterion (f) Rare: 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).

The subject site is not considered rare as it is one of a number of secondary schools in the Shoalhaven area and represents one of a number of schools that were built across the state in the 1990s.

This site does not meet the criterion in this regard.

Criterion (g) Representative: 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).

The subject site is not representative of the local area's cultural or natural environment, with the school having only been constructed in the 1990s.

This site does not meet the criteria in this regard.

5.3 Assessed Statement of Significance

The subject site does not have any identifiable heritage significance. The site formerly consisted of uncleared land that was not developed until 1993. This is despite the land being acquired in 1972 by the Crown for high school purposes. The oldest buildings on site are Buildings A, B and C; however, none of these contain any significant fabric worthy of retention nor are they architecturally distinctive or important to the local community. Vincentia High School is not a rare or representative example of a school in the Shoalhaven LGA.

Overall, the site does not meet the threshold for having local historic heritage significance.

5.4 Statement of Significance for Proximate Heritage Items

The following statement of significance for the adjacent heritage item 'Colonial road—remnants (former Wool Road)', at D3164 and D3200 Princes Highway and The Wool Road, (*Shoalhaven LEP* 2014 item no. 218) has been extracted from its NSW State Heritage Inventory (SHI) form.⁹

An important route explored by Charles Throsby in 1821. The need for a route from Braidwood to the coast for wool was instrumental in its adoption and clearing by convicts in 1841 under Dr Wilson, founder of Braidwood, and Colonel Mackenzie, grazier of Nerriga. The first public road in the Shoalhaven district of which sections remain in use as part of the State road network. Local significance (Shoalhaven).

⁹ *NSW State Heritage Inventory*, 'Colonial Road – remnants (former Wool Road)', Item ID. 2390254, available from: https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=2390254..

6 HERITAGE IMPACT ASSESSMENT

6.1 Legislative Requirements

Due to the known heritage values of the nearby heritage item, the following statutory instruments will apply. Though the proposed activity is being undertaken through a REF pathway, the heritage provisions and controls of the Shoalhaven LEP and DCP have been considered when assessing the potential heritage impact as they identify considerations which are relevant for this heritage impact assessment.

6.1.1 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 proximity to 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. Development consent is required for ant of the following-

6.1.1.1 Discussion

Though the subject site at Vincentia High School is not listed as a heritage item itself, 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 SRISI has identified that the proposed activity is not likely to have any physical or visual impacts to the Colonial Road remnants – former Wool Road heritage item that is in proximity to the school site. This is because of the physical distance between the proposed location of the new school building / works and the heritage item itself, thus any archaeological remnants of the former road will not be physically impacted. There are no identified significant views of these former Wool Road remnants and thus the construction of the new school building will not compromise any significant views or vistas of the heritage item.

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.

6.1.2 Environmental Planning and Assessment (EP&A) Regulation 2021

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.

6.1.2.1 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.

Though not established, the specific significance criteria that are relevant to the heritage significance of the 'Colonial road—remnants (former Wool Road)' heritage item are archaeological, historical and scientific significance. This is because as per the Statement of Significance (extracted at Section 5.4), the heritage item is significant for being the first public road in the Shoalhaven, and of which sections of this road remain in use today.

It is considered that the archaeological, historical and scientific significance of the heritage item will not be impacted by the proposed activity. This is due to the physical distance between the Wool Road remnants and the area proposed for the new homebase building within the schoolgrounds. The history, archaeological and scientific potential of the former colonial road will not be compromised with the proposed activity, thus there is no environmental impact from a heritage perspective.

6.1.3 Shoalhaven Local Environmental Plan 2014

Though the proposed activity is going through an REF pathway, the relevant clauses of the Shoalhaven LEP 2014 have been considered to provide a framework for the assessment of the activity.

5.10 Heritage Conservation

- (1) **Objectives** The objectives of this clause are as follows
 - a) to conserve the environmental heritage of Shoalhaven,
 - *b)* to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,
 - c) to conserve archaeological sites,
 - *d)* to conserve Aboriginal objects and Aboriginal places of heritage significance.

(2) Requirement for consent

Development consent is required for any of the following:

•••

(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,

(d) disturbing or excavating an Aboriginal place of heritage significance,

(e) erecting a building on land:

- (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,
- (3) When consent not required However, development consent under this clause is not required if

- (a) the applicant has notified the consent authority of the proposed development and the consent authority has advised the applicant in writing before any work is carried out that it is satisfied that the proposed development—
 - (i) is of a minor nature or is for the maintenance of the heritage item, Aboriginal object, Aboriginal place of heritage significance or archaeological site or a building, work, relic, tree or place within the heritage conservation area, and
 - (ii) would not adversely affect the heritage significance of the heritage item, Aboriginal object, Aboriginal place, archaeological site or heritage conservation area, or

(c) the development is limited to the removal of a tree or other vegetation that the Council is satisfied is a risk to human life or property, or

- (d) the development is exempt development.
- (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.

6.1.3.1 Discussion

The subject site is not listed as a heritage item, however, it is adjacent to the local heritage item 'Colonial road—remnants (former Wool Road)' (item no. 218 on the *Shoalhaven LEP* 2014). Because it is in vicinity of the heritage item, development at the school may have required development consent from Shoalhaven City Council (Section 5.10 (5) (c)), with a heritage management document to be submitted to assess the proposed development against the heritage values of the heritage item in vicinity.

A heritage management document means:

- (a) a heritage conservation management plan, or
- (b) a heritage impact statement, or
- (c) any other document that provides guidelines for the ongoing management and conservation of a heritage item, Aboriginal object, Aboriginal place of heritage significance or heritage conservation area

If it was required, a Statement of Heritage Impact (SOHI) (formerly Heritage Impact Statement) would need to address the potential visual impacts and overshadowing the proposed activity at Vincentia High School would have on the proximate heritage item. However, as the development is undergoing a REF pathway and not requiring consent from Shoalhaven City Council, a SOHI is not required for the proposal. Instead, the previous SRISI has been updated, utilising the provisions of the LEP as a guide for heritage appropriate development.

Ultimately, the proposed activity is sufficiently distanced from the heritage item 'Colonial road—remnants (former Wool Road)' and so there is no discernible physical or visual impact to the heritage item.

Major excavation on the subject site for future development would require development consent and the preparation of an archaeological assessment in accordance with the archaeological provisions of the *Shoalhaven LEP* 2014 and the *NSW National Parks and Wildlife Act 1974*. The advice of an appropriately qualified archaeologist should be sought at the time prior to any impacts associated with earthworks on the subject lands.

6.1.4 Shoalhaven Development Control Plan 2014

The following addresses the relevant heritage controls within Section 3 - European Heritage and Section 4 - Aboriginal Cultural Heritage of the Shoalhaven DCP 2014. It is noted that the proposal is undergoing an REF pathway and thus addressing these DCP controls is not a requirement for receiving development consent. Regardless, these heritage controls have been considered in this SRISI to illustrate the proposal's minimal heritage impact.

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 Advisory Information

3.3.1 Assessment Considerations

Council must give consideration to a range of matters when assessing an application relation to any heritage items or within any heritage conservation areas including natural and pastoral landscapes. Council will make an assessment of:

- the heritage significance of the item as a heritage item or as a component of a heritage conservation area of the City of Shoalhaven (urban, pastoral or natural); and

- the impacted the proposed development will have on the historic, scientific, cultural, social, archaeological, architectural, natural or aesthetic significance of the heritage item and its site or the heritage conservation area (urban, pastoral, or natural); and

- the impacted the proposed development will have to any stylistic, horticultural or archaeological features of the heritage item or its site or the heritage conservation area (urban, pastoral or natural); and

- the measures proposed to conserve the heritage significance of the item and its setting or the conservation area; and

- the extent to which the carrying out of the proposed development would affect the form of a historic subdivision.

••••

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

6.1.4.1 Discussion

The above heritage controls of the *DCP* (included as a guide for heritage appropriate development) identify that a Statement of Heritage Impact (SOHI) may be required for development that is in the vicinity of a heritage item (Clause 3.3.3). As the heritage item 'Colonial road—remnants (former Wool Road)' (item no. 218) is adjacent to the north of the high school site, development of the site's northern border may be deemed as *"in the vicinity"* and therefore require the preparation of a SOHI. However, considering that the proposal is undergoing an REF, the SOHI to Shoalhaven City Council is not required for the proposed activity, with the SRISI instead updated to provide the assessment of the activity.

Considering that the proposed location of the new two storey homebase building within Vincentia High School is away from the road, the proposed activity would not physically impact the significance of the heritage item in the vicinity. The proposed site for the activity is ~30 metres south of the heritage item, and there are trees situated between the two sites. Likewise, it is likely that there are no significant views or vistas associated with the roadway as the heritage item is archaeological in nature (remnant of a former roadway) which does not require the protection of significant views. Due to the distance and obstruction of view corridors, and the lack of any significant views of the heritage item, the proposed new homebase building at Vincentia High School is unlikely to require the preparation of a SOHI for the subject lands. As such, this SRISI has been updated to provide heritage comments to inform the REF assessment.

6.1.5 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 this project and those applicable to 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

(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),

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.

6.1.5.1 Discussion

As a school is categorised within the educational establishment category, SEPP (Transport and Infrastructure) 2021 is applicable for the proposed activity to take place at Vincentia High School.

Under Section 3.9 of the SEPP, where there is potential for the works to impact on a local heritage item, the impact must be no more than a minimal impact (3.9 (1) (a)) and they must be works which qualify as 'development permitted without consent' (3.9 (1) (b)). The local heritage item that has the potential to be impacted by the activity is the 'Colonial road—remnants (former Wool Road)' (item no. 218 on the *Shoalhaven LEP* 2014), located adjacent to the northern boundary of the subject site. This impact is considered minimal, if any, as the proposed development is sufficiently distanced away from the heritage item and there are no clear sightlines between the two. As the proposed construction of the new two storey building qualifies as 'development permitted without consent' under Section 3.37 (1) (a) (iii) of the *SEPP (Transport and Infrastructure)* 2021, section 3.9 applies to the proposed activity.

Under Section 3.9 (2), the authority undertaking the works need a heritage impact assessment prepared that assesses the proposed works. This SRISI has been modified to accommodate this impact assessment, with this confirming the works to have no heritage impacts. Written notice must be provided to the local Shoalhaven City Council about the proposed works, and any response received within 21 days from Council must be taken into consideration before the works are undertaken.

6.2 Site Fabric

The intent of the original SRISI was to establish the extent to which the development of new teaching spaces to replace existing demountable buildings could be undertaken within Vincentia High School. The following sections address the types of development and appropriateness of future works in relation to Vincentia High School with regard to its heritage context.

6.2.1 Demolition

Vincentia High School contains contemporary 1990s school blocks and structures across both Lot 1 DP 809057 and Lot 1 DP 550361. The oldest buildings on site were constructed in the 1990s (Buildings A, B and C), and these are not deemed to be of heritage significance (not satisfying the criterion set out at *Section 5.2* of this report). As there is no identified heritage significance within the subject site, the complete or partial demolition of any of the school buildings at Vincentia High School would not be opposed from a heritage perspective.

6.2.2 Future Design

There is no height of building control for the subject site under the *Shoalhaven LEP* 2014 (Figure 23). The area located to the northwest across The Wool Road has a maximum building height of 3 metres (A) whilst areas to northeast, east, south and southwest also have no specific height controls.

Considering the distance between the heritage item to the north and the built form of Vincentia High School on the southern area of the allotment, there are no specific heritage recommendations or considerations required in the future design of the proposed homebase building within the school. There is also no identified significant views or vistas of the former Wool Road archaeological remnants, and so development at the school does not need to be specifically articulated to address the heritage item in proximity.



Figure 23: Height of Buildings Map for the area, showing Vincentia High School (identified in red) with no maximum height control. Source: Shoalhaven Local Environmental Plan 2014, Height of Buildings Map HOB_020C and HOB_02DD.

6.2.3 Conservation & Maintenance – what are the items / fabric that should be conserved?

From this desktop SRISI, there appear to be no buildings within the Vincentia High School complex that possess significant fabric that are worthy of retention and conservation. As a result, there are no specific buildings or items which are deemed necessary to conserve.

In general, the archaeological remnants of the former Wool Road need to be conserved, however as the heritage item is not within the subject site and the proposed activity does not physically impact on it, this is not considered relevant.

6.2.4 What are the items / fabric that can be altered?

As discussed previously, the existing buildings at the subject site were built between 1990s-2023, and these are assessed as not having any heritage significance. As a result, all the buildings within the school could be altered or modified to accommodate future development at the school, including the construction of new teaching spaces and facilities.

6.2.5 Other Matters

A basic AHIMS database search was undertaken on Wednesday 13 September 2023 with a 1km buffer zone around the subject lands (Figure 24). The AHIMS search indicated that there are no (0) Aboriginal sites recorded within the footprint of the study area, but there are four (4) registered Aboriginal sites within a 1km radius of the study area located to the north. This is likely to reflect the fact the study area itself has not been

subject to any previous archaeological investigations rather than indicating that there is no Aboriginal archaeology present on or near the study area.

Apex Archaeology Due Diligence Assessment

Apex Archaeology undertook an Aboriginal archaeological due diligence assessment for the subject lands:

• Apex Archaeology. November 2023. *PRELIMINARY INDIGENOUS HERITAGE ASSESSMENT AND IMPACT REPORT FOR VINCENTIA HIGH SCHOOL, VINCENTIA, NSW.* Unpublished Report Submitted to NSW Education School Infrastructure.

The results of the background research and site inspection indicated that (ibid: 1):

"A desktop assessment identified that the site is considered disturbed and is situated within an existing school in a semi-rural residential environment with no previously registered Aboriginal sites within 200m, or any previously identified landforms in close proximity that may result in sub surface Aboriginal archaeological deposits.

A site inspection identified that ground disturbance is prevalent across the majority of the study area, as existing buildings and play areas have been benched into the original ground surface to create level areas. There are some areas of open space (oval and periphery), however this area has seen ground surface modification activities over the last 100 years. Evidence of vegetation clearance (historic and recent), landscaping, building, landscape modification and ongoing land use practices are evident within the entire study area. It is considered highly unlikely that archaeological material will be present within the study area due to the level of disturbance within the site, as well as topographical features of the area being unlikely to have been a focus of occupation by Aboriginal people in the past.

A site visit was undertaken on 1 August 2023. No surface Aboriginal artefacts were identified within the site and no areas of potential archaeological deposit were noted."

The recommendations of the report are referenced in the section below.



Figure 24: Basic AHIMS search with a 1km radius for 142 The Wool Road, Vincentia, 2540, showing there are no registered Aboriginal sites within the study area, but there are four registered Aboriginal sites or places north of the study area.

Management

The results of the Apex Archaeology (November 2023) due diligence assessment recommended that (ibid: 1-2):

- "There are no areas within the study area considered likely to have Aboriginal cultural heritage values. No further Aboriginal archaeological assessment is necessary for development within the site. No Aboriginal Heritage Impact Permit (AHIP) will be necessary prior to works commencing within the site.
- This due diligence assessment must be kept by School Infrastructure NSW so that it can be presented, if needed, as a defence from prosecution under Section 86(2) of the National Parks and Wildlife Act 1974.
- Should unanticipated archaeological material be encountered during site works, all work must cease and an archaeologist contacted to make an assessment of the find. Further archaeological assessment and Aboriginal community consultation may be required prior to the recommencement of works. Any objects confirmed to be Aboriginal in origin must be reported to Heritage NSW.
- It is noted that educational development projects may be assessed as State Significant Development (SSD), which generally require preparation of an Aboriginal Cultural Heritage Assessment (ACHA) report to inform the application. In this instance, given the level of disturbance across the site and the lack of archaeological potential identified, it is recommended that in the event of an SSD Planning pathway being utilised, Heritage NSW and the Department of Planning and Environment do not require preparation of an ACHA as part of the Secretary's Environmental Assessment Requirements (SEARs) for the project."

The Aboriginal archaeological due diligence undertaken by Apex Archaeology (2023) 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. CPH supports the recommendations of the Apex Archaeology report for the study area.

Any proposed impacts to the study area should generally proceed with caution. Should any unexpected Aboriginal – or suspected – objects, features or deposits be identified during construction works, the proponent should follow the unexpected finds protocol.

6.3 Early Trees

The 1987 aerial imagery of the subject site indicates that the site was extensively covered in trees and vegetation before its clearing in the 1990s to accommodate the school. The school today contains several trees within the school's boundaries, however some of these trees appear to have been replanted following the 1993 construction of school buildings. Trees on the site's eastern boundaries may potentially be surviving early trees, however this could not be confirmed in this report.

It is acknowledged that the site's bushfire risk means it is likely that the Asset Protection Zone (APZ) would need expanding, which would require some clearing of vegetation along the site's north-eastern corner. The vegetation between the buildings and the eastern boundary are also managed via a Vegetation Management Plan. The findings of the arborist report by Allied Tree Consultancy should inform which trees can be cleared from the site to expand the APZ and accommodate the proposed activity.



Figure 25: Early Trees (indicated in yellow) within the subject site (marked in red). Source: Overlay by City Plan Heritage over 1959 Aerial Imagery retrieved from NSW Historical Imagery Viewer (accessed September 2023). Note the image quality is not clear.



Figure 26: Early Trees (indicated in yellow) still present on site within the subject site (outlined in red). Their clearance should be advised by the arborist report undertaken for the school. Source: Overlay by City Plan Heritage over Aerial Imagery retrieved from SIX Maps (accessed August 2023).

6.4 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 SRISI has assessed that the proposal will have no impact on the heritage significance of the heritage item in proximity. The 'Colonial road—remnants (former Wool Road)' (item no. 218 on the *Shoalhaven LEP* 2014) will retain its heritage values and therefore there are no mitigation measures recommended.

7 HIGH RISK AREAS

The purpose of the SRISI is to identify areas within Vincentia High School that are suitable and unsuitable for the construction of the new teaching spaces and facilities based upon the heritage considerations for the site.

Based on the above heritage assessment, it is evident that Vincentia High School does not possess heritage significance due to it being constructed in the early-1990s and not having any aesthetically distinctive qualities. The school was designated by 1972 and would open in 1993, with it receiving additional alterations classrooms and structures over the first five years of its operation. As a result of the site not having heritage significance, there is no High Risk Area identified for the site from a European heritage perspective.

8 CONCLUSION AND EVALUATION OF ENVIRONMENTAL IMPACTS

In conclusion, the existing Vincentia High School is not listed as a heritage item under Part 1 of Schedule 5 of the *Shoalhaven LEP* 2014, nor under the Department of Education Section 170 Conservation Register. The school is however in proximity to the heritage item 'Colonial road—remnants (former Wool Road)' (Item 218), which is listed as a local heritage item on the *Shoalhaven LEP* 2014.

No buildings within Vincentia High School nor the school site itself have been assessed in this desktop SRISI as having potential for heritage significance. This SRISI has identified that the site may contain a number of potentially significant trees that were likely not cleared during the construction of the school. The Allied Tree Consultancy arborist report should inform of any significant trees within the site requiring retention.

It is considered by City Plan Heritage that:

- 1. The extent and nature of potential heritage impacts from the proposed activity is minimal, if any, and it will not 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 or visual impacts to the proximate "Colonial road—remnants (former Wool Road)" (item no. 218 on the *Shoalhaven LEP* 2014). This is because the proposed location for the new homebase building within Vincentia High School is sufficiently distanced away from the heritage item which is within the roadway. There are no identified significant views of the heritage item (being road remnants) and so there is no potential for the proposed activity to visually impact the heritage item.

No further heritage assessment is required to assess potential heritage impact of the proposed activity.

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