

# European Heritage Impact Assessments

## Summary Report of Initial Site Investigations

### for the upgrade of Ulladulla High School at 55 South Street, Ulladulla NSW 2539

Prepared for:



Education  
School Infrastructure



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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
DCP	Development Control Plan
DoE	Department of Education
HCA	Heritage Conservation Area
LEP	Local Environmental Plan
LGA	Local Government Area
MUHS	Milton Ulladulla Historical Society
PAD	Potential Archaeological Deposits
REF	Review of Environmental Factors
SEPP	State Environmental Planning Policy
SHI	State Heritage Inventory
SOHI	Statement of Heritage Impact

# Table of Contents

EXECUTIVE SUMMARY .....	7
1 INTRODUCTION AND BACKGROUND .....	8
1.1 Background .....	8
1.2 Site Background .....	8
1.3 The Proposal .....	10
1.4 Limitations .....	11
2 SITE CONTEXT AND DESCRIPTION .....	12
2.1 Site Context .....	12
2.2 Site Description .....	14
3 LITERATURE REVIEW .....	18
4 SITE HISTORY .....	19
4.1 Indigenous History .....	19
4.2 History of Ulladulla .....	19
4.3 History of the Subject Site .....	22
5 SITE SIGNIFICANCE .....	28
5.1 Basis for Assessment .....	28
5.2 Assessment of Criteria .....	28
5.3 Assessed Statement of Significance .....	29
5.4 Statement of Significance for Proximate Heritage Items .....	30
6 OPPORTUNITIES AND CONSTRAINTS .....	31
6.1 Legislative Requirements .....	31
6.2 Site Fabric .....	37
6.3 Early Trees .....	40
6.4 Mitigation Measures .....	42
7 HIGH RISK AREAS .....	43
8 CONCLUSION AND EVALUATION OF ENVIRONMENTAL IMPACTS .....	44
9 REFERENCES .....	45

## Figures

Figure 1: Cadastral map of the two parts of the subject site within surrounding context. Source: SIX Maps, accessed August 2023. ....	8
Figure 2: Aerial view of the subject site showing Lot 1 DP 595313 (outlined in red). Source: Near Maps (2023 imagery). ....	9
Figure 3: Heritage Map of Ulladulla, showing the school site at 55 South Street (indicated in red) and the surrounding heritage context. Source: Shoalhaven LEP 2014, Heritage Map – Sheet HER_016D. ....	10



Figure 4: Proposed site plan for Ulladulla High School, showing location of the proposed new PTS on the southern side of the sports oval. Source: Fulton Trotter Architects .....	11
Figure 5: General view along Green Street, looking east directly opposite the subject site. Source: Google Street View (June 2022) accessed September 2023. ....	12
Figure 6: General view along St Vincent Street, looking south from the intersection with Green Street. Source: Google Street View (January 2010) accessed September 2023. ....	12
Figure 7: General view along South Street, looking west from the intersection with St Vincent Street. Source: Google Street View (January 2010) accessed September 2023. ....	13
Figure 8: General view along South Street, looking east from the intersection with Camden Street. Source: Google Street View (January 2010) accessed September 2023. ....	13
Figure 9: General view along Camden Street, looking north from the intersection with South Street. Source: Google Street View (January 2010) accessed September 2023. ....	13
Figure 10: General view at the intersection of Green and Camden Streets, looking southwest. Source: Google Street View (June 2022) accessed September 2023. ....	14
Figure 11: View facing south-east along Camden Street at sports field within northern area of Ulladulla High School. Source: DoE, 2023. ....	15
Figure 12: View facing north along Camden Street showing sports field within Ulladulla High School (right), with Ulladulla Public School in the background (left). Source: DoE, 2023. ....	15
Figure 13: View facing south within Ulladulla High School showing school buildings Q (left) and M (centre). Source: Fulton Trotter Architects, 2024. ....	16
Figure 14: View facing north within Ulladulla High School showing sports field. In the far background is Ulladulla which contains the nearest heritage item. Source: Fulton Trotter Architects, 2024. ....	16
Figure 15: Existing site plan for Ulladulla High School prepared by NBRS. Source: Ulladulla High School Upgrade Study, 2023. ....	17
Figure 17: 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: <a href="https://aiatsis.gov.au/explore/map-indigenous-australia">https://aiatsis.gov.au/explore/map-indigenous-australia</a> . ....	19
Figure 18: Photograph of Millards Creek Bridge at Ulladulla in c1900. Source: MUHS, 'Towns of Milton-Ulladulla', available from: <a href="https://muhsinc.org.au/our-places/towns-of-milton-ulladulla/">https://muhsinc.org.au/our-places/towns-of-milton-ulladulla/</a> . ....	20
Figure 19: 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: <a href="https://muhsinc.org.au/our-places/towns-of-milton-ulladulla">https://muhsinc.org.au/our-places/towns-of-milton-ulladulla</a> . ....	21
Figure 20: 1959 aerial image showing approximate boundaries of the subject site (indicated in yellow). Source: NSW Government Historical Aerial Imagery.....	22
Figure 21: Sketch attached to the inspection report prepared in 1959 with respect of proposed public school at Ulladulla. Source: State Archives NSW, 'Administrative file School Records 1876-1979', Item No [14/7893]. ....	23
Figure 22: 1969 map of Town of Ulladulla and Adjoining Lands, fifth edition. Source: NSW Land Registry Services Historical Land Records Viewer, AO Map No.38862. ....	23
Figure 23: Photograph of Ulladulla High School in February 1977, not long after its construction. Source: NSW State Library, 'Ulladulla High School', available from: <a href="https://collection.sl.nsw.gov.au/record/YEGEkybn">https://collection.sl.nsw.gov.au/record/YEGEkybn</a> . ....	24
Figure 24: Ulladulla High School, 1977. Source: NSW State Library, 'Ulladulla High School', February 1977, available from: <a href="https://collection.sl.nsw.gov.au/record/n5l3Z579">https://collection.sl.nsw.gov.au/record/n5l3Z579</a> . ....	24
Figure 25: Ulladulla High School, 1977. Source: NSW State Library, 'Ulladulla High School', February 1977, available from: <a href="https://collection.sl.nsw.gov.au/record/1kVvgwZn">https://collection.sl.nsw.gov.au/record/1kVvgwZn</a> . ....	24
Figure 26: Ulladulla High School, 1977. Source: NSW State Library, 'Ulladulla High School', February 1977, available from: <a href="https://collection.sl.nsw.gov.au/record/nGmEj50Y">https://collection.sl.nsw.gov.au/record/nGmEj50Y</a> . ....	25
Figure 27: Ulladulla High School, 1977. Source: NSW State Library, 'Ulladulla High School', February 1977, available from: <a href="https://collection.sl.nsw.gov.au/record/93Qw8mq1">https://collection.sl.nsw.gov.au/record/93Qw8mq1</a> . ....	25
Figure 28: 1979 aerial image showing approximate boundaries of the subject site (indicated in yellow). Source: NSW Government Historical Aerial Imagery.....	26
Figure 29: 1991 aerial image showing approximate boundaries of the subject site (indicated in yellow). New development circled in green. Source: NSW Government Historical Aerial Imagery. ....	26
Figure 30: 2010 aerial image showing the subject site (indicated in yellow). Source: Six Maps. ....	26
Figure 31: Contemporary aerial imagery of the site, showing construction of Block R (Hall) in recent years (post 2010). ....	27

Figure 32: Height of Buildings Map for the area, showing Ulladulla High School (identified in red) with no maximum height control. Source: Shoalhaven Local Environmental Plan 2014, Height of Buildings Map HOB\_016D. .... 38

Figure 33: Basic AHIMS search for 55 South Street, Ulladulla, showing 3 Aboriginal sites within a 1-kilometre radius of the study area. .... 39

Figure 34: 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. .... 41

Figure 35: Early Trees (indicated in yellow) still present on site within the subject site (outlined in red). Source: Overlay by City Plan Heritage over Aerial Imagery retrieved from Near Maps (accessed November 2023). .... 42

## 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 Ulladulla High School at 55 South Street, Ulladulla (the subject site) to guide future development opportunities and constraints for the site. Specifically, SINSW required an investigation into the future upgrade 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 to support a Review of Environmental Factors (REF) for the DoE for upgrades to Ulladulla 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.

Ulladulla 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. It is located in proximity to the heritage item ‘Victorian Georgian style Sandstone School and Schoolmaster’s Residence’ (item no. 484 on the *Shoalhaven LEP 2014*). No buildings within Ulladulla High School, nor the school site itself, has been assessed in this desktop SRISI as having potential for heritage significance.

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

1. There are no potential impacts on the established heritage significance of the proximate heritage item (no. 484). The activity will also have no significant impact on the heritage locality, community and/or 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 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 Ulladulla 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 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

Ulladulla High School is located at 55 South Street, Ulladulla, NSW, 2539 and is legally referred to as Lot 1 in Deposited Plan 595313. The site is located within the Shoalhaven Local Government Area (LGA) and has an approximate area of 6.5ha. A cadastral map of the site is provided at Figure 1.

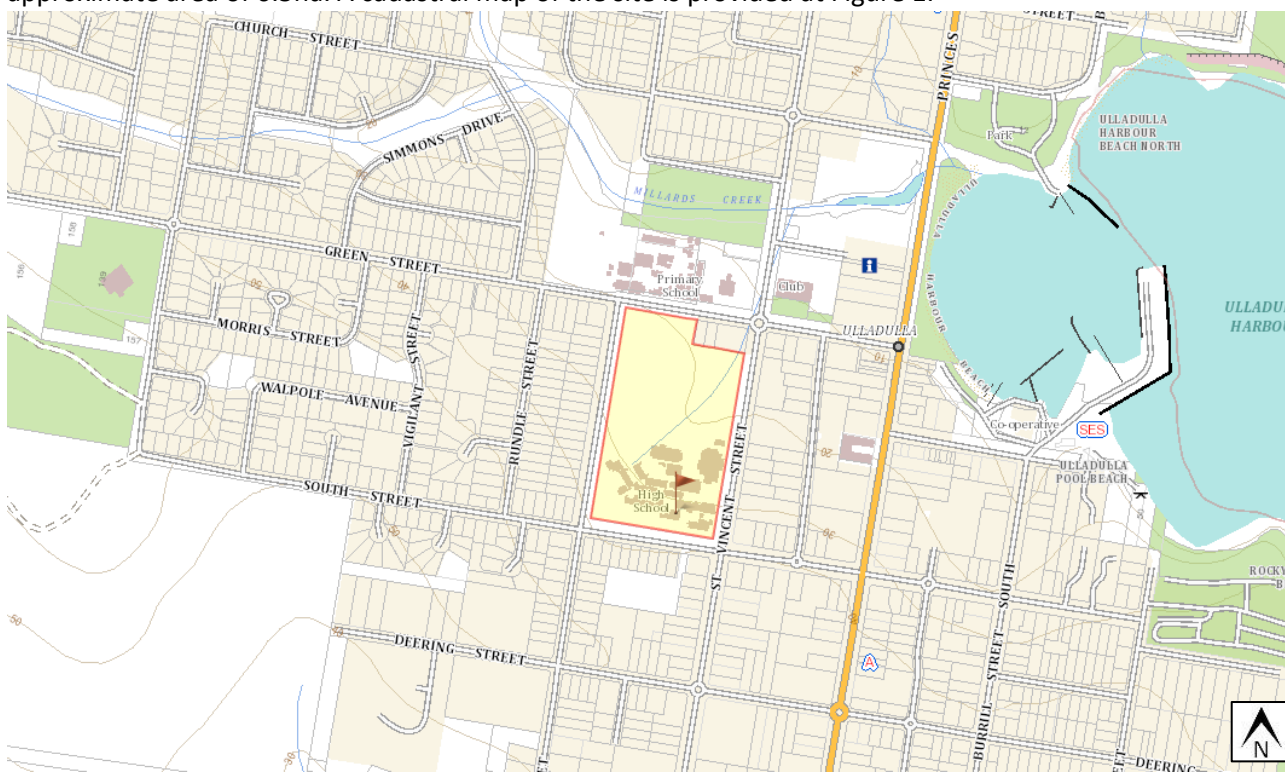


Figure 1: Cadastral map of the two parts of the subject site within surrounding context. Source: SIX Maps, accessed August 2023.

### 1.2.2 Legal Description

The subject Ulladulla High School occupies an irregular rectangular shape Lot 1 DP 595313 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 595313 (outlined in red). Source: Near Maps (2023 imagery).

### 1.2.3 Heritage Listing

The subject site (Ulladulla High School) is not identified as a heritage item under Part 1 of Schedule 5 of the *Shoalhaven Local Environmental Plan (LEP) 2014*, nor is it located within designated boundaries of a heritage conservation area. However, it is located in proximity to several heritage items (Figure 3):

#### *Environmental Planning and Assessment Act, 1979*

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

- Victorian Georgian style Sandstone School and Schoolmaster's Residence, 241 Green Street, item no.484
- Sandstone Weir – Millards Creek, St Vincent Street, item no. 492
- Relocated Victorian Georgian Timber Slab Worker's Cottage, 275 Green Street, item no. 485

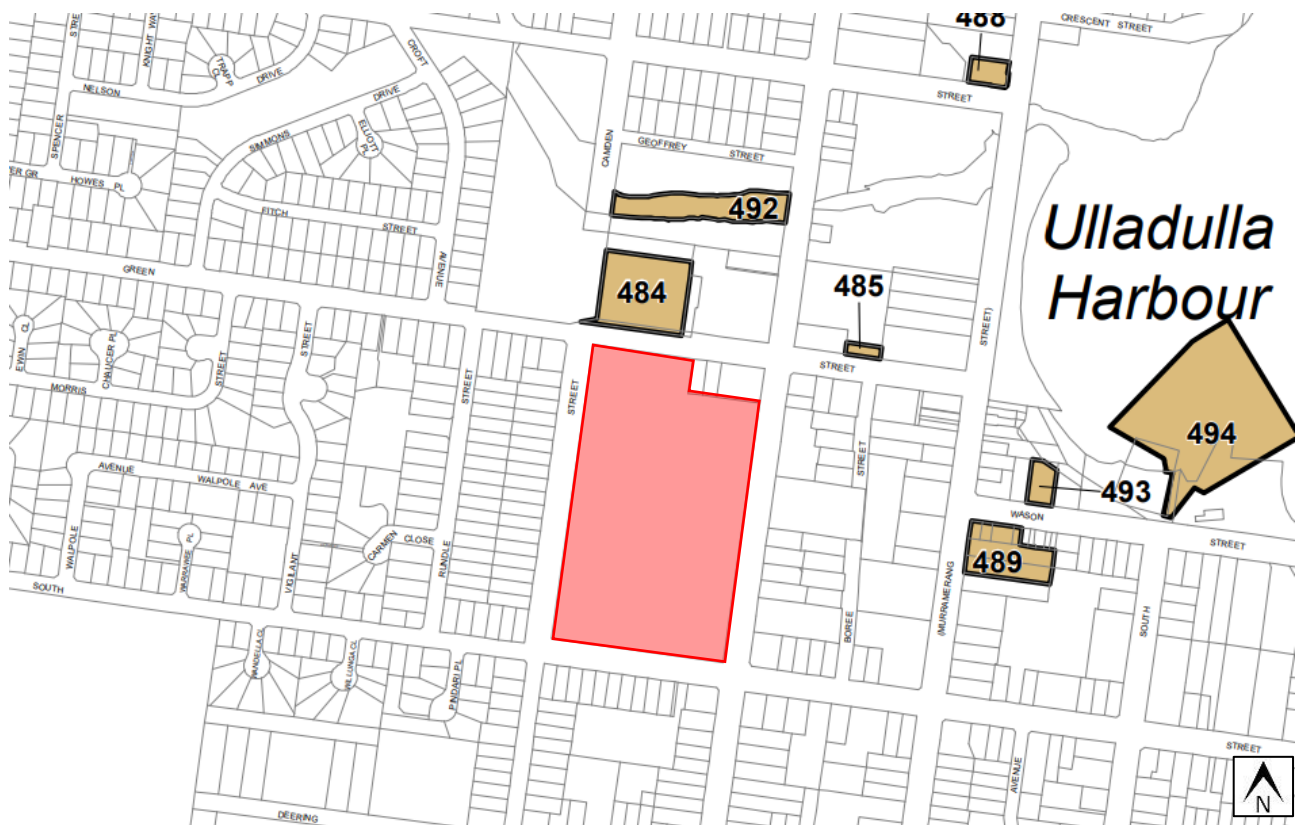


Figure 3: Heritage Map of Ulladulla, showing the school site at 55 South Street (indicated in red) and the surrounding heritage context. Source: Shoalhaven LEP 2014, Heritage Map – Sheet HER\_016D.

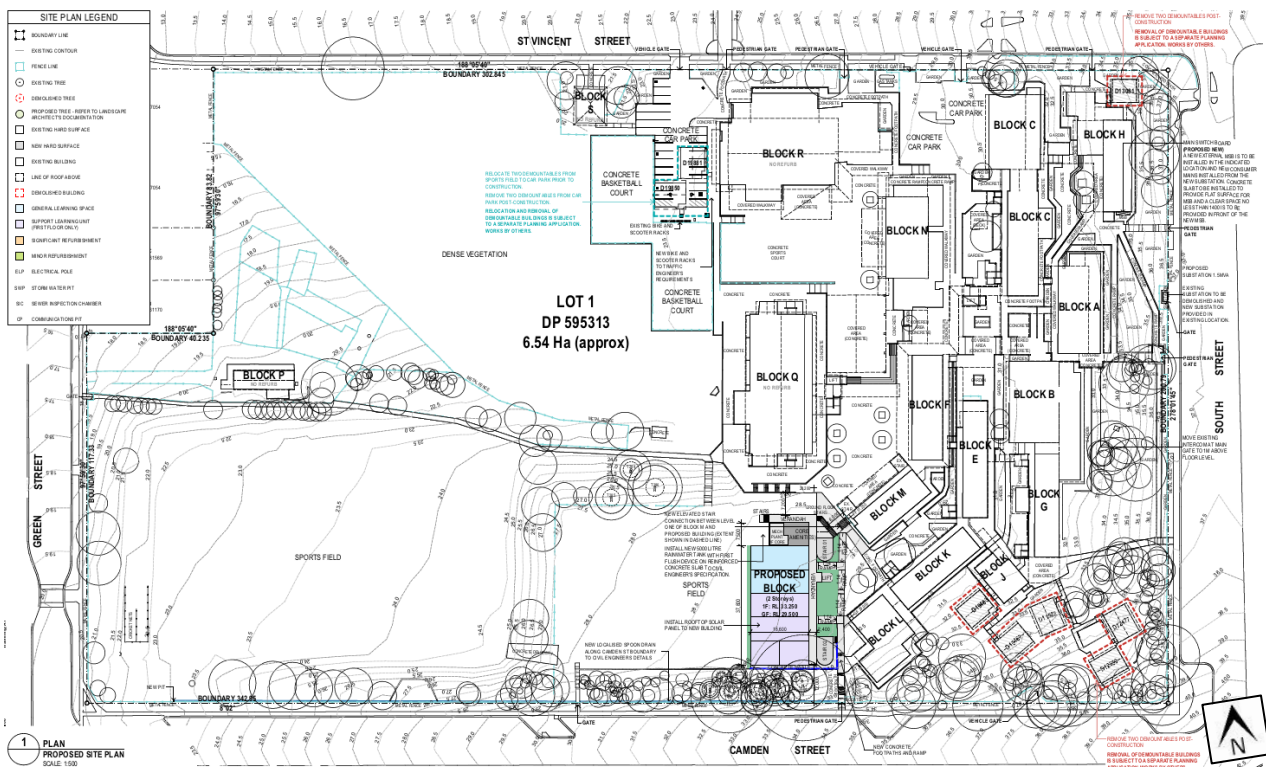
### 1.3 The Proposal

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

- Construction of a new two-storey homebase building.
- Construction of new stairs and covered walkways.
- Upgrade works to existing internal pedestrian pathways.
- Installation of solar panels.
- External landscape works.

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





**Figure 4: Proposed site plan for Ulladulla High School, showing location of the proposed new PTS on the southern side of the sports oval. Source: Fulton Trotter Architects**

## 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 NSW DoE in June 2023 and Fulton Trotter Architects in September 2024 to inform their understanding of the school and its surrounding heritage context. This has not restricted their assessment of the existing conditions of the school and the likely impacts of the proposed development.

## 2 SITE CONTEXT AND DESCRIPTION

### 2.1 Site Context

The surrounding locality of Ulladulla High School is primarily residential to the west and south. Ulladulla Town Centre is located to the east of the site. Ulladulla Public School, which has an identified heritage item within its curtilage, is situated to the immediate north of Ulladulla High School, opposite the Green Street boundary of the subject site.

The following images provide an overview of the site's context (Figure 5 – Figure 10).



Figure 5: General view along Green Street, looking east directly opposite the subject site. Source: Google Street View (June 2022) accessed September 2023.



Figure 6: General view along St Vincent Street, looking south from the intersection with Green Street. Source: Google Street View (January 2010) accessed September 2023.





Figure 7: General view along South Street, looking west from the intersection with St Vincent Street. Source: Google Street View (January 2010) accessed September 2023.



Figure 8: General view along South Street, looking east from the intersection with Camden Street. Source: Google Street View (January 2010) accessed September 2023.

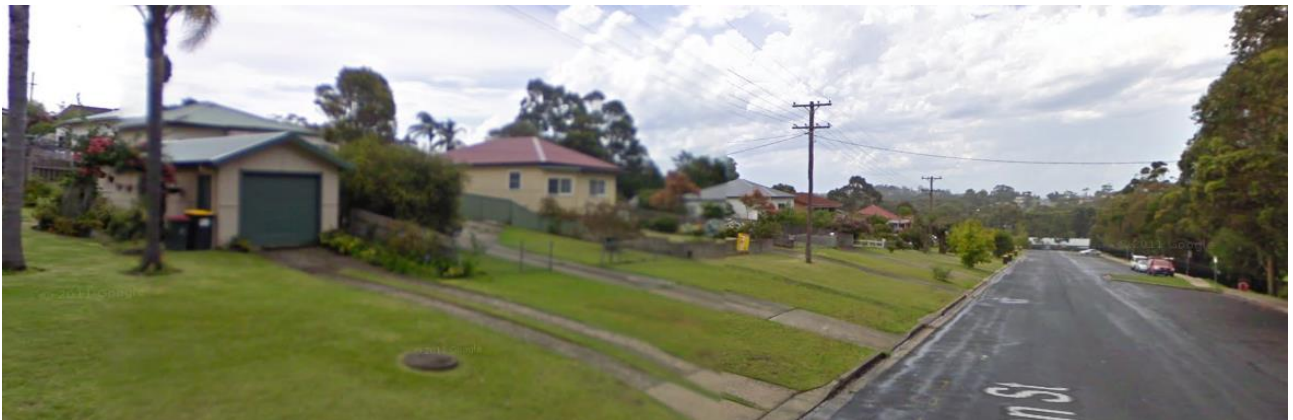


Figure 9: General view along Camden Street, looking north from the intersection with South Street. Source: Google Street View (January 2010) accessed September 2023.





Figure 10: General view at the intersection of Green and Camden Streets, looking southwest. Source: Google Street View (June 2022) accessed September 2023.

## 2.2 Site Description

The following description has relied upon site photographs undertaken by NSW DoE in June 2023, and by Fulton Trotter Architects in September 2024.

The Ulladulla High School site is zoned SP2 Educational Establishment and existing development comprises various buildings, a car park, landscaping, sports fields and sports courts associated with Ulladulla High School. Ulladulla High School currently comprises 61 Permanent Teaching Spaces (PTS) and 8 Demountable Teaching Spaces (DTS). Playing fields are located in the north western portion of the site.

The site is largely rectangular in shape, however, it is indented in the north east corner where an early learning centre is situated outside of the site boundary on the corner of Green Street and St Vincent Street. The primary frontage to the school is along St Vincent Street to the east, with two vehicular access points to at-grade carparking areas.

Dense vegetation is located in the central and eastern portion of the site, separating the school buildings from the early learning centre. Vegetation is also concentrated around the site boundaries and around the playing fields.

The following images provide an overview of the site (Figure 11 – Figure 14).





Figure 11: View facing south-east along Camden Street at sports field within northern area of Ulladulla High School. Source: DoE, 2023.



Figure 12: View facing north along Camden Street showing sports field within Ulladulla High School (right), with Ulladulla Public School in the background (left). Source: DoE, 2023.





*Figure 13: View facing south within Ulladulla High School showing school buildings Q (left) and M (centre). Source: Fulton Trotter Architects, 2024.*



*Figure 14: View facing north within Ulladulla High School showing sports field. In the far background is Ulladulla which contains the nearest heritage item. Source: Fulton Trotter Architects, 2024.*



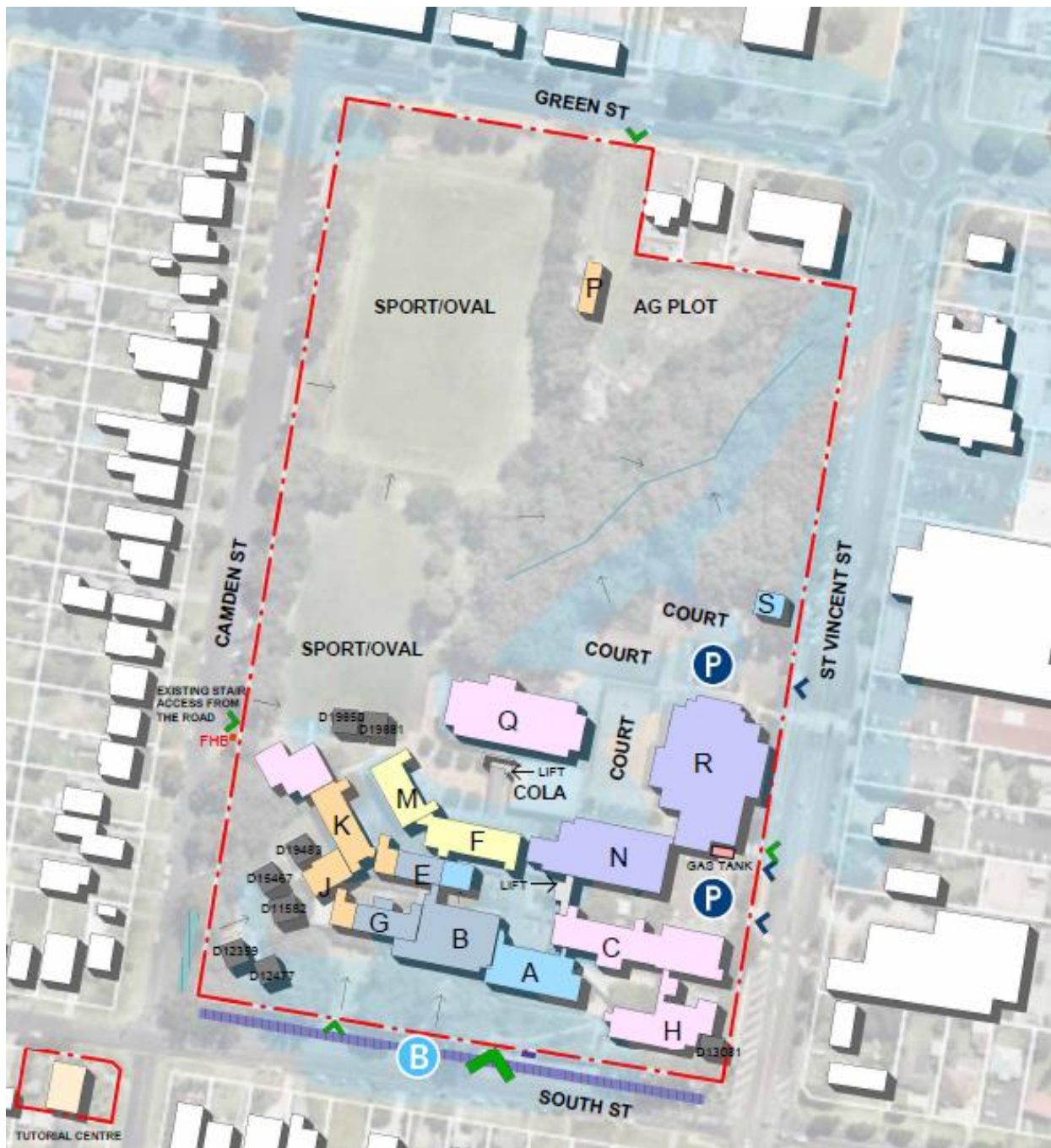


Figure 15: Existing site plan for Ulladulla High School prepared by NBRIS. Source: Ulladulla High School Upgrade Study, 2023.

### 3 LITERATURE REVIEW

There have been no previous studies or reports that could be found or reviewed to inform 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 Milton Ulladulla Historical Society website:<sup>1</sup>

*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 16: 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>.

There were no Aboriginal sites or places identified within the footprint of the subject site or within the 50m buffer zone around the subject site (based on the general information generated by the Aboriginal Heritage Information Management System – AHIMS). However, three (3) Aboriginal sites are identified within a 1000m buffer around the subject site. The lack of any identified sites 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 Ulladulla

The following history of the suburb of Ulladulla has been extracted from the Milton Ulladulla Historical Society website:<sup>2</sup>

*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"*

<sup>1</sup> Milton Ulladulla Historical Society (MUHS), 'Our History', available from: <https://muhsinc.org.au/>.

<sup>2</sup> MUHS, 'Towns of Milton-Ulladulla', available from: <https://muhsinc.org.au/our-places/towns-of-milton-ulladulla/>.

*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 17: 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 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 18: 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>.

### 4.3 History of the Subject Site

The earliest aerial image of the subject site dates back to 1959 (Figure 19). This image shows the subject site predominately being undeveloped and covered with mature trees. Several dwellings can be identified on the north-eastern corner of the allotment along Green Street, and in the central part of the eastern boundary along St Vincent Street. These were individual residences owned by different individuals, whilst land surrounding these properties were designated as public reserves.



*Figure 19: 1959 aerial image showing approximate boundaries of the subject site (indicated in yellow). Source: NSW Government Historical Aerial Imagery.*

At the time of the 1959 aerial imagery, correspondence between the Department of Education that is available from the State Archives of NSW identifies those portions of land on the subject site fronting Green Street were originally acquired as additional land for expanding Ulladulla Public School, which is situated opposite on the north side of Green Street. Prior to being reverted to the Crown for educational purposes, these allotments were actually set aside originally for a Presbyterian Church; however, it appears that no such church was ever built on this land. A sketch was attached to an Inspector's Report done for the site, showing the state of ownership of the land in 1959 (Figure 20). It shows the area acquired for expansion of the public school fronting Green Street, various reserves for public recreation and public buildings, and a number of smaller allotments owned individually (St Vincent Street and Green Street). Throughout the 1960s, the smaller residential allotments within the subject site were acquired by the Crown, with residents compensated (Figure 21).



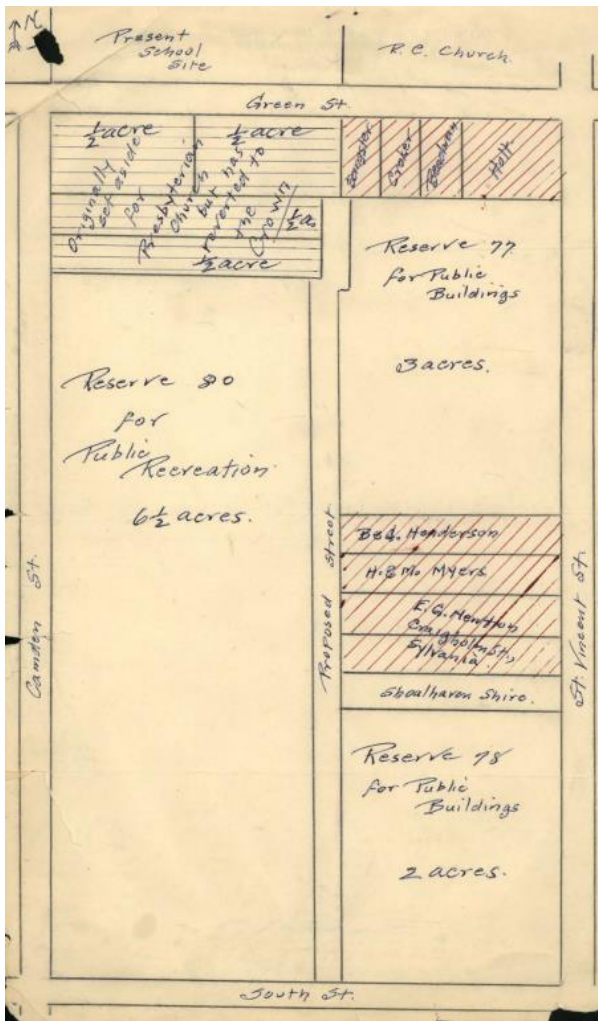


Figure 20: Sketch attached to the inspection report prepared in 1959 with respect of proposed public school at Ulladulla. Source: State Archives NSW, 'Administrative file School Records 1876-1979', Item No [14/7893].

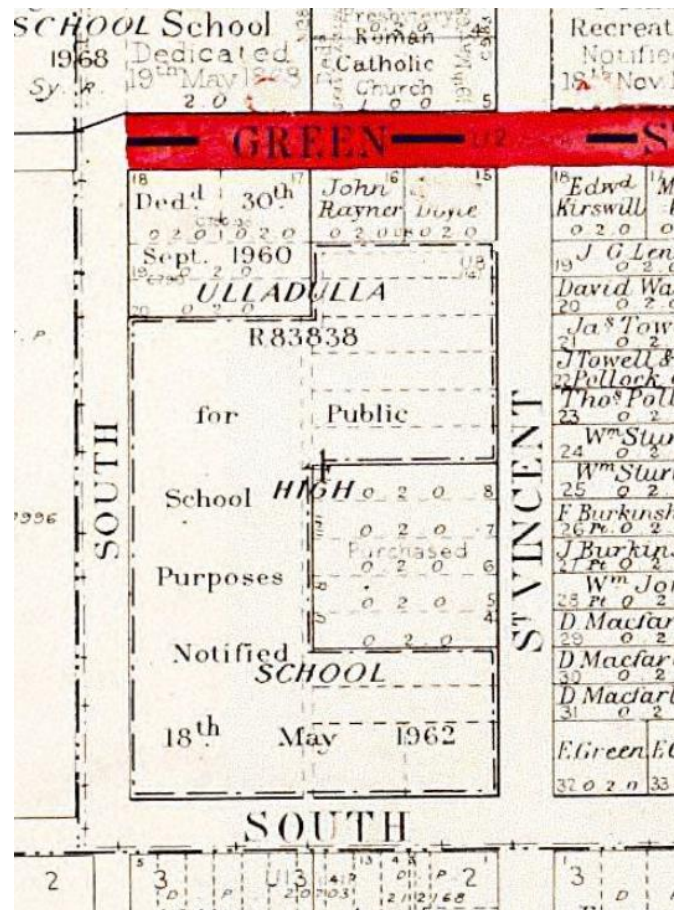


Figure 21: 1969 map of Town of Ulladulla and Adjoining Lands, fifth edition. Source: NSW Land Registry Services Historical Land Records Viewer, AO Map No.38862.

To service the growing educational needs of the Ulladulla and Milton community, a new Ulladulla High School was established in 1974 at the present subject site. Whilst construction was being undertaken from 1974-1975, the Ulladulla High School was temporarily accommodated at the Milton Central School, situated at 1974 Thomas Street, Milton. The new school had an estimated enrolment of 378 students, and this was anticipated to rise in later years to 600+. Correspondence shows that the Stage 1 construction of Ulladulla High School was “nearing completion” by December 1975, with it anticipated that the new school would be in operation at the beginning of 1976.<sup>3</sup> An application was made for the name Ulladulla High School in November 1975,<sup>4</sup> and this was officially designated in January 1976.<sup>5</sup> The school would be photographed in February 1977, showing the extent of the works undertaken.

<sup>3</sup> State Archives NSW, 'Administrative file, School records 1876-1979, Item No: [14/7893]', available from: [https://search.records.nsw.gov.au/primo-explore/fulldisplay?context=L&vid=61SRA&lang=en\\_US&docid=INDEX1474109](https://search.records.nsw.gov.au/primo-explore/fulldisplay?context=L&vid=61SRA&lang=en_US&docid=INDEX1474109).

<sup>4</sup> Government Gazette of the State of New South Wales, 'Geographical Names Act, 1966', 21 November 1975 [Issue 151], p. 4919, available from: <https://trove.nla.gov.au/newspaper/article/220171675>.

<sup>5</sup> Government Gazette of the State of New South Wales, 'Geographical Names Act, 1966', 16 January 1976 [Issue 8], p. 273, available from: <https://trove.nla.gov.au/newspaper/article/220113421>.



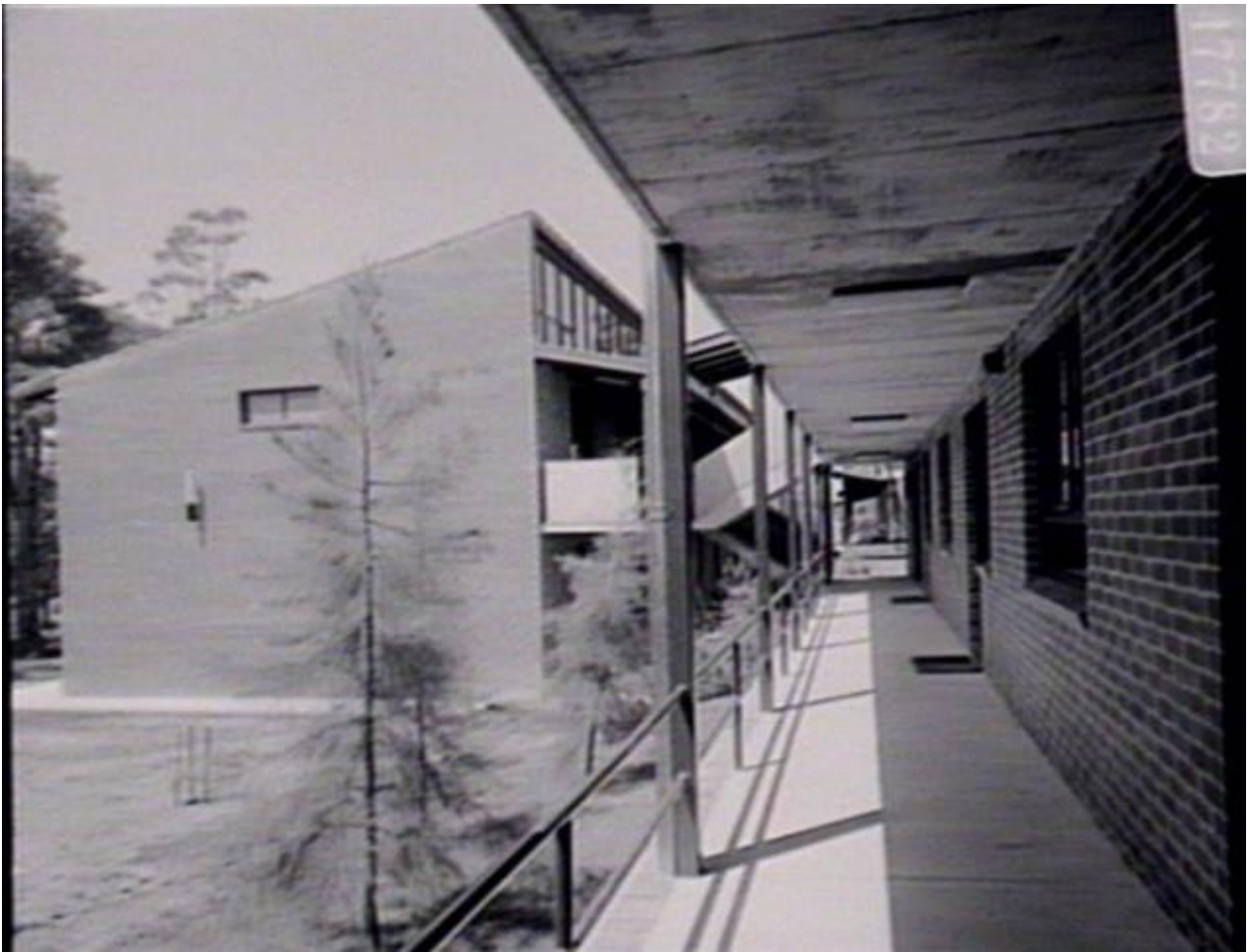


Figure 22: Photograph of Ulladulla High School in February 1977, not long after its construction. Source: NSW State Library, 'Ulladulla High School', available from: <https://collection.sl.nsw.gov.au/record/YEGKybn>.



Figure 23: Ulladulla High School, 1977. Source: NSW State Library, 'Ulladulla High School', February 1977, available from: <https://collection.sl.nsw.gov.au/record/n5l3Z579>.



Figure 24: Ulladulla High School, 1977. Source: NSW State Library, 'Ulladulla High School', February 1977, available from: <https://collection.sl.nsw.gov.au/record/1kVvgwZn>.



Figure 25: Ulladulla High School, 1977. Source: NSW State Library, 'Ulladulla High School', February 1977, available from: <https://collection.sl.nsw.gov.au/record/nGmEj50Y>.



Figure 26: Ulladulla High School, 1977. Source: NSW State Library, 'Ulladulla High School', February 1977, available from: <https://collection.sl.nsw.gov.au/record/93Qw8mq1>.

The 1979 aerial imagery of the site shows that it was partially cleared, with residential dwellings along St Vincent Street demolished as part of their acquisition by the Crown. Most significantly, school buildings on the southern part of the site were clearly already built by this time (Figure 27). There appears to be at least some buildings associated with the school constructed, as well as a sporting field established. Tenders were first called for the establishment of this playing field in April 1978,<sup>6</sup> with it clearly established before 1979.

According to a record saved within the State Archives of NSW (but not accessible online), additional construction of accommodation for students was undertaken at Ulladulla High School between 1984-1989. This is likely to be the buildings constructed on the Camden Street boundary or on the St Vincent Street boundary, both of which are visible in the 1991 aerial imagery of the site (Figure 28).

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<sup>6</sup> *Government Gazette of the State of New South Wales*, 'Department of Public Works – Tenders for Works', 28 April 1978 [issue 46], p. 1571, available from: <https://trove.nla.gov.au/newspaper/article/220208944>.





Figure 27: 1979 aerial image showing approximate boundaries of the subject site (indicated in yellow). Source: NSW Government Historical Aerial Imagery.



Figure 28: 1991 aerial image showing approximate boundaries of the subject site (indicated in yellow). New development circled in green. Source: NSW Government Historical Aerial Imagery.



Figure 29: 2010 aerial image showing the subject site (indicated in yellow). Source: Six Maps.



Figure 30: Contemporary aerial imagery of the site, showing construction of Block R (Hall) in recent years (post 2010).



## 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; and
- Formal or aesthetic qualities.

The subject site Ulladulla 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 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 was either set aside as public reserves, reserved for the construction of a Presbyterian Church, or occupied by small residential allotments. The site in its entirety was acquired by the Department of Education by the 1970s, with construction of the school undertaken in 1975. The school was officially opened in 1976, and though many of the original buildings are still surviving in its original form, these are not assessed as being historically significant to the Ulladulla community.

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 strong historical association with Ulladulla High School. There are no known significant figures associated with the construction of the school, nor with its operation over the last 50 years.

The site does not meet the criterion in this regard.

**Criterion I 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 mid-1970s school classroom buildings, 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 with Ulladulla High School. Consultation with the local Ulladulla 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, and represents one of a number of schools that were built across the state in the 1970s.

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 1970s.

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 that satisfies the threshold for heritage listing. The site formerly consisted of public reserves and some residences; however, these were replaced with the current school on the site in the 1970s. Ulladulla High School opened in 1976, and though it has provided education to the local community for almost 50 years, it is likely that this is not deemed significant to satisfy the criterion for historical significance. Likewise, the school is not architecturally distinctive nor representative of any specific trend that contributes to the aesthetics of Ulladulla.

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 proximate heritage item 'Victorian Georgian style Sandstone School and Schoolmaster's Residence' has been extracted from its respect SHI form listing.<sup>7</sup>

*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).*

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<sup>7</sup> 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>.

## 6 OPPORTUNITIES AND CONSTRAINTS

### 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 close 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 any of the following-*

##### 6.1.1.1 Discussion

Though the subject site at Ulladulla High School is not listed as a heritage item itself, there is a duty for a 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 Victorian Georgian style Sandstone School and Schoolmaster's Residence 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. Any significance views of the Victorian Georgian style Sandstone School and Schoolmaster's Residence are well away from the proposed activity, which is situated towards the southern portion of the Ulladulla High School schoolgrounds, and so none of these views and vistas will be impacted.

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 '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 5.4), 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 in proximity will not be impacted by the proposed activity. This is due to the physical distance between the heritage item at Ulladulla Public School, and the area proposed for the new homebase building within Ulladulla High School. 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.

#### 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.*

**(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 in proximity to the local heritage item 'Victorian Georgian style Sandstone School and Schoolmaster's Residence' (item 484 on the *Shoalhaven LEP* 2014). Because it is opposite the heritage item (on Green Street), 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 Ulladulla 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.

It is noted that the proposed activity, which includes the construction of a two-storey homebase building, is located along the site's western and southern boundaries, a considerable distance away from the heritage item at Ulladulla Public School (over 250 metres) and where no visual relationship exists. This location will therefore not require a full SOHI, though ultimately if the proposal was to go through a development application to Council, it is Council's prerogative to determine.

Ultimately, the proposed activity is sufficiently distanced from the heritage item 'Victorian Georgian style Sandstone School and Schoolmaster's Residence' 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 o 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 our 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 Heritage Impact Statement (Statement of Heritage Impact (SOHI)) is required to be prepared for development that is in the vicinity of a heritage item (Clause 3.3.3). As the heritage item 'Victorian Georgian style Sandstone School and Schoolmaster's Residence' (item 484) is situated to the north of the high school site, opposite Green Street, 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 at Ulladulla High School is confined to the western elevation, it is likely that the development would not visually physically the significance of the heritage item in vicinity. The proposed site for development is approximately 250 metres south of the heritage item, and there are trees and sporting field equipment situated between the two sites. The lack of any sightlines means that the proposed activity would not be discernible from the heritage item, nor would it impact on the heritage item's ability to be appreciated and interpreted. Due to the distance and obstruction of view corridors, the proposed new teaching space at Ulladulla 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 the school is categorised within the educational establishment category, *SEPP (Transport and Infrastructure)* 2021 is applicable for the proposed activity to take place at Ulladulla 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 ‘Victorian Georgian style Sandstone School and Schoolmaster’s Residence’ (item 484 on the *Shoalhaven LEP* 2014), located opposite the northern boundary of the subject site. This impact is considered minimal, if any, as the proposed development is situated over 250 metres away from the heritage item and where 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 it also 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 Ulladulla High School. The following sections address the types of development and appropriateness of future works in relation to Ulladulla High School with regard to its heritage context.

### 6.2.1 Demolition

Ulladulla High School contains a blend of 1970s school blocks and contemporary classrooms and structures across Lot 1 DP 595313. The oldest buildings on site were constructed in 1975, 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 Ulladulla High School would not be opposed from a heritage perspective.

### 6.2.2 Future Design

There are no specific height controls for the subject site under the *Shoalhaven LEP* 2014 (Figure 31). Areas located to the west and south of the school have a maximum building height of 8.5 metres (I2), whilst areas to the east along St Vincent Street allow for a maximum building height of 14 metres (N2).

Considering the distance between the heritage item to the north and the built form of Ulladulla 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 grounds.



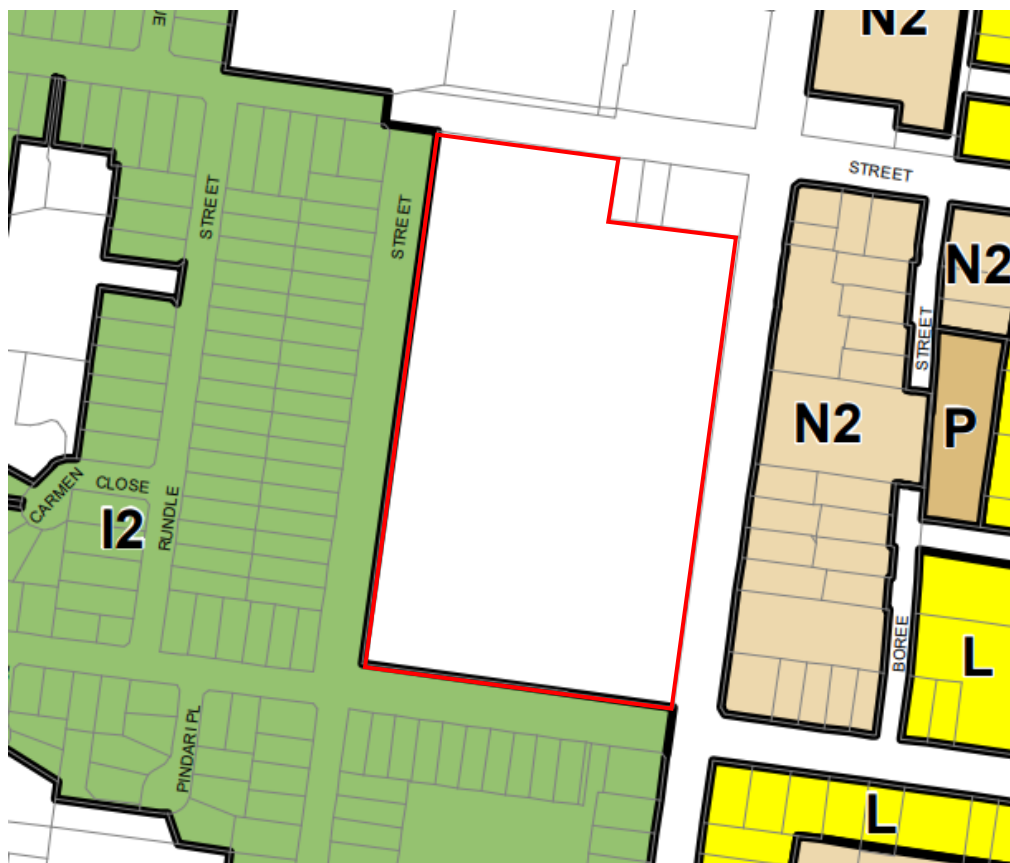


Figure 31: Height of Buildings Map for the area, showing Ulladulla High School (identified in red) with no maximum height control. Source: Shoalhaven Local Environmental Plan 2014, Height of Buildings Map HOB\_016D.

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

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

#### 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 1975-2023, and these are therefore 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 Thursday 7 September 2023 with a 1 km buffer zone around the subject lands (Figure 32). The AHIMS search indicated that there are no Aboriginal sites recorded within the footprint of the study area, although this is likely to reflect the fact the study area has not been subject to any previous archaeological investigations rather than indicating that there is no Aboriginal archaeology present on the study area. There are however three AHIMS sites recorded within one kilometre of the study area boundaries.

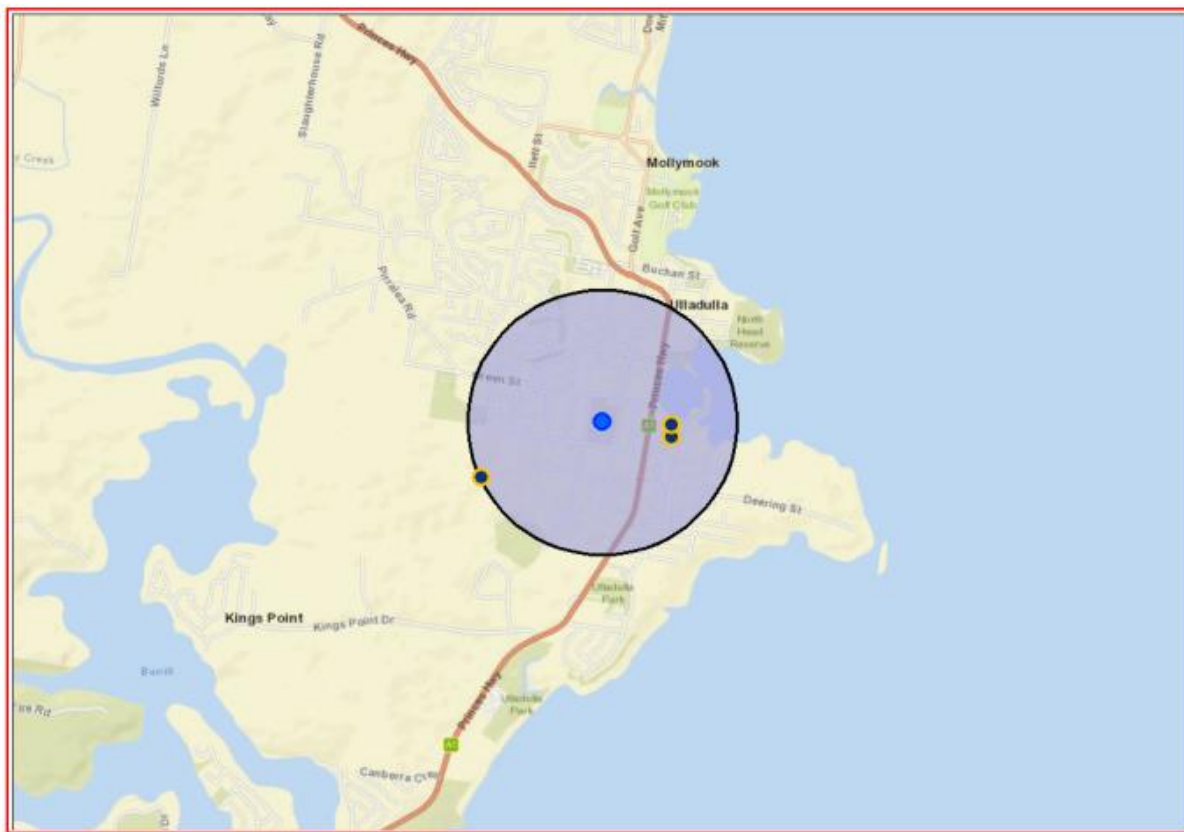


Figure 32: Basic AHIMS search for 55 South Street, Ulladulla, showing 3 Aboriginal sites within a 1-kilometre radius of the study area.

### Apex Archaeology Due Diligence Assessment

Apex Archaeology was commissioned to undertake an Aboriginal archaeological due diligence assessment of the study area:

- November 2023. PRELIMINARY INDIGENOUS HERITAGE ASSESSMENT AND IMPACT REPORT FOR ULLADULLA HIGH SCHOOL, ULLADULLA, NSW. Unpublished Report Prepared for NSW Education School Infrastructure.

This assessment summarised the findings in relation to Aboriginal heritage (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.*

*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 study concluded that (ibid: 19):

*“Ground disturbance was high throughout the study area due to historic vegetation clearance, subsequent landscape modification and landscaping activities relating to the school construction and*

*various upgrades over the years, including installation of subsurface services within the site. The study area has been intensely modified with multiple areas benched and built up. Landscape modification has reduced the potential for any intact archaeological sub-surface deposits within the study area to nil.*

*The study area is situated on a moderate slope, which was unlikely to have been a focus of habitation for Aboriginal people in the past.”*

The Apex Archaeology report 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.”*

## **Management**

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 which is 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 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 1959 aerial imagery of the subject site indicates that the site was extensively covered in trees and vegetation before its clearing in the 1970s to accommodate the school. This is because most of the site was dedicated as public reserves which retained their original natural landscape and setting. It is noted that the 1959 aerial imagery is blurry and thus there may be more or fewer trees across the site to what is marked in Figure 33.

Comparing the 1959 aerial imagery with that of the 2010 imagery, there appears to be a number of surviving early trees spread across the school site, particularly on the site’s eastern elevation fronting St Vincent Street



(Figure 34). The arborist report prepared for the site by Allied Tree Consultancy provides an assessment of the trees and the how they should be managed.

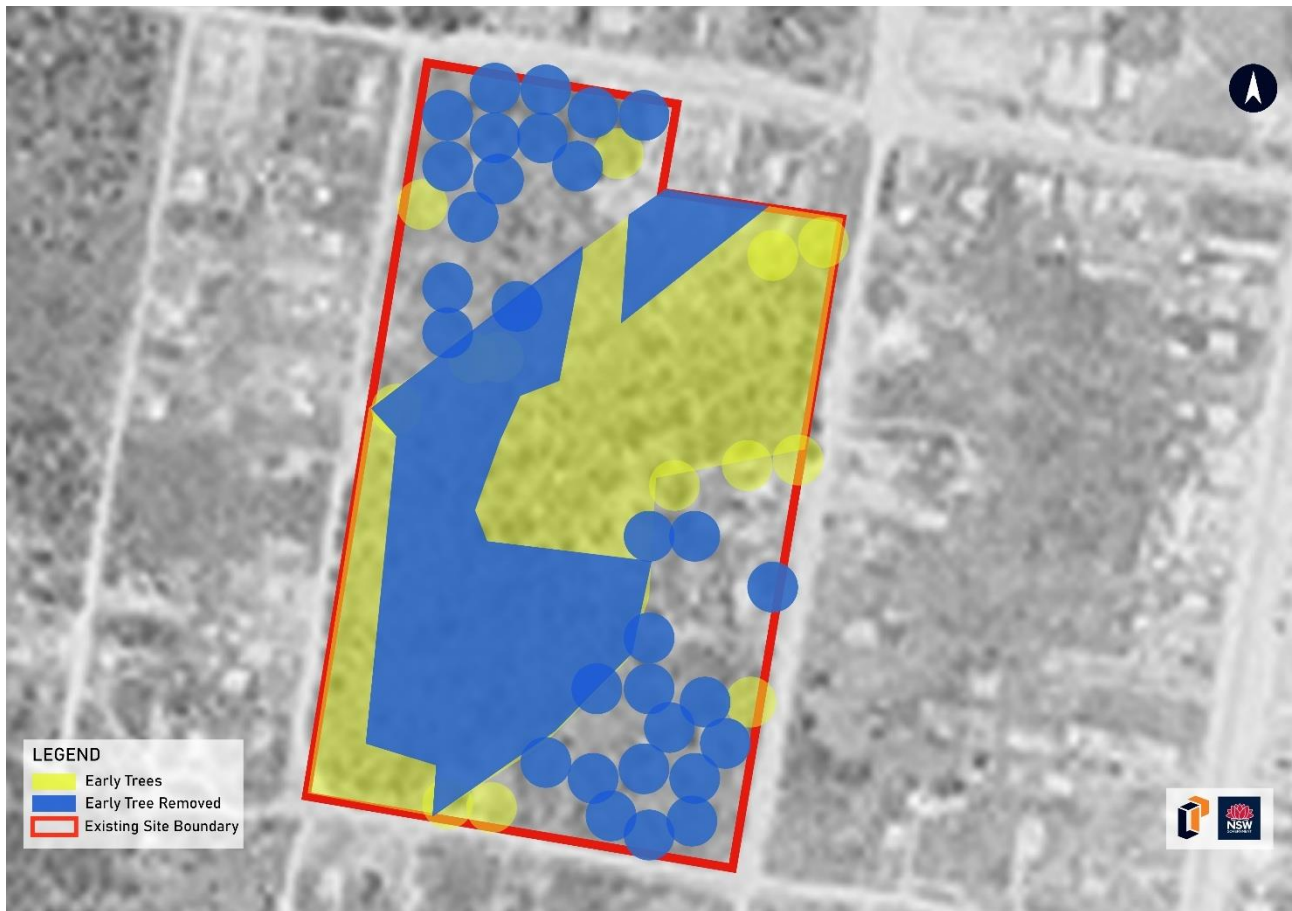


Figure 33: Early Trees (indicated in yellow) within the subject site (marked in red). Source: Overlay by City Plan Heritage over 1959 Aerial Imagery retrieved from NSW Historical Imagery Viewer (accessed September 2023). Note the image quality is not clear.



Figure 34: Early Trees (indicated in yellow) still present on site within the subject site (outlined in red). Source: Overlay by City Plan Heritage over Aerial Imagery retrieved from Near Maps (accessed November 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 'Victorian Georgian style Sandstone School and Schoolmaster's Residence ' (item no. 484 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 Ulladulla 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 Ulladulla High School does not possess heritage significance due to its relatively modern construction in the mid-1970s and not having any aesthetically distinctive qualities. The school was designated by 1974 and would open in 1976, with it receiving various alterations and additional classrooms and structures over the last few decades. 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 Ulladulla 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 'Victorian Georgian style Sandstone School and Schoolmaster's Residence' (Item 484) at 241 Green Street, within Ulladulla Public School.

No buildings within Ulladulla High School nor the school site itself have been assessed in this desktop SRISI as having the potential to retain historical heritage significance. This SRISI has identified that the site contains a number of early trees that pre-date the earliest aerial imagery of the site (1959). The assessment of these trees significance and their appropriate management is guided by the arborist report prepared by Allied Tree Consultancy.

It is considered by City Plan Heritage that);

1. The extent and nature of potential impacts of the proposed activity are 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 identified heritage impacts.

The proposal has no physical or visual impacts to the proximate 'Victorian Georgian style Sandstone School and Schoolmaster's Residence' (item no. 484 on the *Shoalhaven LEP* 2014). This is because the proposed location for the new homebase building within Ulladulla High School is sufficiently distanced away from the heritage listed building at 241 Green Street. No significant views or vistas of the heritage item will be impacted by the proposed activity.

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

## 9 REFERENCES

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