



38-54 Eton Street, Sutherland NSW 2232

Submitted to RPS Consulting
On Behalf of NSW Department of Education (DoE)

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06	04/03/2025	Consultant Final V	Carole-Lynne Kerrigan	Verified by Carole-Lynne Kerrigan	

This report has been reviewed and approved for issue in accordance with City Plan's quality assurance policy and procedures.

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1. BACKGROUND

1.1. Introduction

City Plan Heritage (CPH) has been engaged by School Infrastructure NSW (SINSW), a division of the NSW Department of Education (DoE), to assess the potential impact the proposed works may have on the known heritage values of Sutherland Public School, located at 38-54 Eton Street, Sutherland NSW 2232 (subject site).

This Statement of Heritage Impact (SOHI) has been prepared to support a Review of Environmental Factors (REF) for the DoE in relation to the construction of a new hall at Sutherland Public 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*. The activity is to be undertaken pursuant to Chapter 3, Part 3.4, Section 3.37 of the *SEPP (Transport and Infrastructure)* 2021.

The proposed activity is for the construction of a new hall within the grounds of the existing Sutherland Public School, as well as alterations to the existing fence and covered walkway network.

The purpose of this report is to assess the potential heritage impacts of the proposed activity on the subject site's heritage values and to determine whether it will have any adverse impact on the established heritage values of the school. All recommendations are made in accordance with statutory requirements and cultural heritage best practice.

1.2. The Site

Sutherland Public School is located within the suburb of Sutherland. The school grounds (38-54 Eton Street) is bound by Eton St to the west, Flora Street to the north, Merton Street to the east and President Avenue to the south. This area is occupied by the main classroom buildings of Sutherland Public School.

For a more detailed description of the site and its context, see section 2.0 Site Description and Context.

1.3. Legal Description

The subject site occupied by Sutherland Public School buildings comprises of 16 adjacent allotments:

- Lots 1-10 DP 6600
- Lots 5-10 Section 45 DP 802





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



Figure 2: Aerial view of Sutherland Public School, showing the 16 allotments which make up the schoolgrounds. Source: SIX Maps (2018 imagery), accessed August 2023.



1.4. Heritage Listing

The subject site (Sutherland Public School) contains two separate heritage items identified under Part 1 of Schedule 5 of the *Sutherland Shire Local Environmental Plan (LEP)* 2015 as having local significance:

- 'Former Sutherland Intermediate High School building (now part of Sutherland Primary School)', 38–54 Eton Street, Lots 6-10, Section 45 DP 802, item no.3614.1
- 'Sutherland Primary School, including original building and grounds', Flora Street (corner of Eton and Merton Streets), Lot 5, Section 45, DP 802; Lots 1–10, DP 6600, item no.3618.²

It is noted that the 'original building' in the item 3618 heritage listing is Building B, which fronts onto Flora Street.

The subject site is also listed on the Section 170 Conservation Register of the Department of Education as 'Sutherland Public School – Building B00B and Grounds',³ and 'Sutherland Public School – Building B00A.'⁴

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

Environmental Planning and Assessment Act, 1979

Sutherland Shire Local Environmental Plan (LEP) 2015, Part 1 Heritage items

'Church', Flora Street (corner of Merton Street), item no. 3619

'Single tree - Ficus rubiginosa (Port Jackson Fig)', Western side of Eton Street, outside 61-65 Eton Street, item no. 3617



Figure 3: Heritage Map of Sutherland, showing two parts of the school site at 38-54 Eton Street (indicated in red) and the surrounding heritage context.

¹ New South Wales State Heritage Inventory (NSW SHI), 'Sutherland Primary School', Item ID 2440223, available from: https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=2440223. NOTE: The SHI form for Item ID 2440223 identifies that the "building is incorrectly named and should be Former Intermediate High School."

NSW 'Sutherland Primary 2440224. https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=2440224. NSW SHI, 'Sutherland Public School - Building B00B and Grounds', ID 5065773, available Item from: https://www.hms.heritage.nsw.gov.au/App/ltem/ViewItem?itemId=5065773. B00A', ID 5065772. available SHI. 'Sutherland Public School Buildina Item from: https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=5065772.





1.5. The Proposal

The proposal involves the construction of a new communal hall within Sutherland Public School. This hall will contain associated stores, offices, canteen and amenities, as well as signage on the exterior for Sutherland Public School with the school's crest.

Specifically, the proposal involves the following:

- Demolition of existing Block J building
- Demolition of existing paved connection, covered walkways and columns and construction of new walkways to connect new hall with existing network
- Relocation of existing Covered Outdoor Learning Area (Cola)
- Removal of existing trees identified as T3, T4, T5, T6, T7 and T8 as well as associated garden beds and retaining walls
- Alterations to existing boundary fencing and gates
- Alterations to existing service network to accommodate required services for new hall building

This SOHI has assessed the following information provided by BKA Architecture.

BKA Architecture			
Date	Title	Drawing No	Revision
18.12.2024	Cover Sheet	A-000	A
17.01.2025	Site Plan	A-005	В
17.01.2025	Demolition Plan	A-006	В
17.01.2025	Building Set Out Plan	A-007	В
16.01.2025	Wall Type Schedule - Sheet 01	A-010	В
16.01.2025	Wall Type Schedule - Sheet 02	A-011	В
13.12.2024	Concrete Set Out Plan	A-100	A
17.01.2025	Ground Floor Plan	A-110	В
13.12.2024	Partition Plan	A-115	A
16.01.2025	Reflected Ceiling Plan	A-120	А
17.01.2025	Roof Plan	A-130	A
13.12.2024	Elevations - Sheet 01	A-200	А
13.12.2024	Elevations - Sheet 02	A-201	А
13.12.2024	Sections - Sheet 01	A-300	А
13.12.2024	Sections - Sheet 02	A-301	А
13.12.2024	Internal Elevations	A-400	А
13.12.2024	Wall Section Details - Sheet 01	A-450	А



BKA Architecture			
13.12.2024	Wall Section Details - Sheet 02	A-451	А
13.12.2024	Wall Plan Details	A-460	A
13.12.2024	Wet Area Details	A-500	A
13.12.2024	Joinery Details - Kitchenette	A-510	A
13.12.2024	External Works - Covered Walkway Sections	A-550	A
13.12.2024	External Works - OSD Tank Section	A-551	A
13.12.2024	Stair and Ramp Details	A-560	A
13.12.2024	Typical Handrail Details	A-570	A
16.01.2025	Door Schedule 01	A-600	В
18.12.2024	Door Schedule 02	A-601	В
13.12.2024	Glazing Schedule	A-601	A
17.01.2025	Furniture Plan	A-700	В
17.01.2025	Signage Plan	A-710	В
13.12.2024	Typical Signage Diagrams	A-711	A
13.12.2024	External Finishes	A-750	А
17.01.2025	Principle Priced Option 1 & 2 - Cola and Rainwater Tank's Relocation	A-900	В
17.01.2025	Principle Priced Option 3 - Cola Skylights	A-901	В



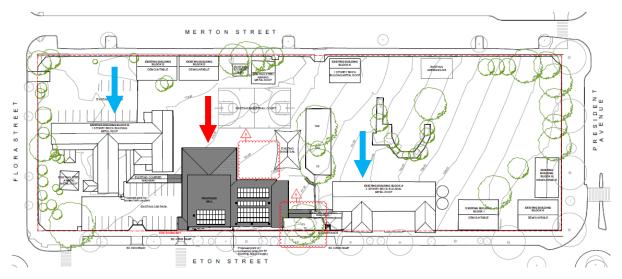


Figure 4: Proposed Site Plan, showing location for the proposed hall (indicated by red arrow) within the schoolgrounds. Heritage item 3614 and 3618 are indicated by blue arrows.

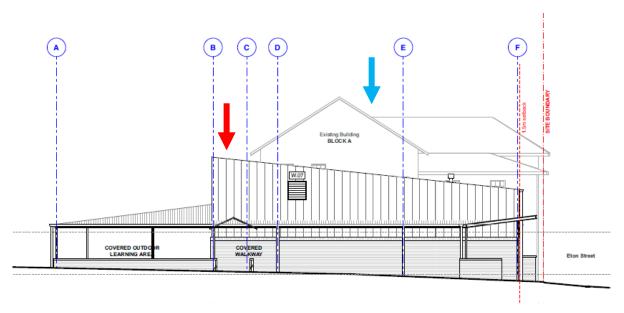


Figure 5: North elevation for the proposed new hall (red arrow), with item 3614 (Block A) indicated in the background (blue arrow).



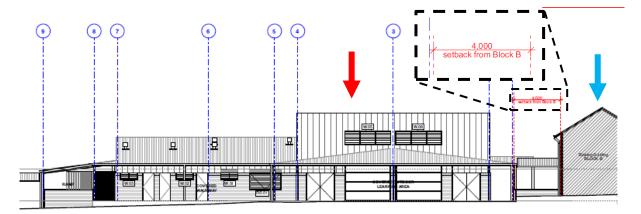


Figure 6: East Elevation, showing 4 metre setback between proposed hall (left, red arrow) and heritage item 3618 / Block B (right, blue arrow).

Relevant Reports

The following previous studies and reports were reviewed during production of this report. Relevant information has been included where necessary:

- European Heritage Summary Report of Initial Site Investigations: Sutherland Public School (SRISI), City Plan Heritage, November 2023
- Heritage Impact Statement for Sutherland Public School, Robert Demkiw, 2008
- Statement of Environmental Effects for Sutherland Public School, Kralis Architects, 2007

1.6. Methodology

This SOHI relates to the construction of a new hall within Sutherland Public School. It has been prepared in accordance with the NSW Department of Planning and Environment (DPE) publications, *Guidelines for preparing a Statement of Heritage Impact*, 2023 and Assessing Heritage Significance, 2023. It is also guided by the philosophy and processes included in *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance*, 2013 (Burra Charter).

The subject proposal has been assessed in relation to the relevant controls and provisions contained within the *Sutherland Shire LEP* 2015 and the *Sutherland Shire Development Control Plan (DCP)* 2015. It forms one of a collection of specialist reports.

Research for this SOHI has adopted a two-stepped approach. Step 1 comprised a desktop assessment and Step 2 was a site survey. This document provides the combined findings and recommendations resulting from this approach.

Step 1

Research into the early development of the site was undertaken to get a better understanding of the place. CPH previously prepared a *European Heritage Summary Report of Initial Site Investigations* (*SRISI*) for the school in November 2023, with this consulted to inform the history of the site.

Step 2

A site survey of Sutherland Public School was carried out by Kurt Dixon on 12 September 2023 (during the preparation of the *SRISI*), with the purpose of photographing and understanding the place. All results are presented in *Section 2. Site Context and Description*

1.7. Constraints and Limitations

- Accurate measured drawings do not form part of this assessment
- This SOHI does not include a heritage landscape assessment



- This SOHI relates to the proposed works and documentation described in Section 1.5 Proposal and Section 1.6 Methodology. It does not relate to any additional or revised documentation by any party.
- While this SOHI does not include a full Historical Archaeological Assessment, the likely historical archaeological potential of the site has been considered through the phases of development across the subject site to inform assessment of the likely impact of the proposed development.
- This assessment does not include an assessment of Aboriginal values. An assessment of the Aboriginal cultural significance of the area was undertaken in the *Preliminary Indigenous Heritage Assessment and Impact Report* prepared for the site by Kayandel in September 2024.
- Only a visual assessment of the subject site was carried out. Intrusive methods were not employed.
- This assessment does not include for the provision of a title search for the subject site.

1.8. Author Identification

The following report has been prepared by:

Kurt Dixon, Senior Heritage Consultant (BA-LLB (History)).

The SOHI has been reviewed and endorsed by:

 Kerime Danis, Director - Heritage (MHeritCons (Hons), BArch, Associate RAIA, M.ICOMOS, ICOMOS AdCom).



2. SITE CONTEXT AND DESCRIPTION

2.1. Site Context

The subject site is located within the Sutherland Town Centre. The suburb of Sutherland is located approximately 23 kilometres south of the Sydney Central Business District (CBD) on the Old Princes Highway and Illawarra railway line, and is bound by the Woronora Cemetery to the west and the Royal National Park to the south. It is a predominately residential area with commercial development concentrated in the vicinity of Sutherland Railway Station and along the Princes Highway.

Due to the location of the subject site within the Sutherland Town Centre, the subject site is predominately surrounded by commercial, administrative and educational buildings, with some medium density residential development situated to the southeast. Sutherland Railway Station is located approximately 250 metres to the northwest of the subject site.

The following images provide an overview of the site's context (Figure 7 - Figure 10).



Figure 7: General view along Flora Street, looking west from the intersection with Merton Street.



Figure 8: General view along President Avenue, between Eton and Merton Streets, facing east.





Figure 9: View at intersection of President Avenue and Merton Street facing west, showing multi-storey mixed development.



Figure 10: View facing east of Flora Street, showing commercial centre of Sutherland.





2.2. Site Description

A site inspection was undertaken by Kurt Dixon, Heritage Consultant, on 12 September 2023 to understand the site's physical setting and context.

Sutherland Public School – 38-54 Eton Street

Sutherland Public School occupies a rectangular block comprising of 16 separate allotments. Within this site are three brick buildings, being Block A, Block B and Block K (toilet block), and 6 weatherboard structures, being Blocks D, E, G, H, I and J. Additionally, the school site features a bus shelter, several covered areas, vegetable garden, and sand pit.

Block A along Eton Street (south of the Boyle Street roundabout) was erected by 1929 and displays features of the Interwar Free Classical style. It is a part face brick and part rendered brick building on a stone base and under a hipped terracotta roof. The building's northern elevation features a gabled bay, as well as a portico that acts as the main entrance to the building. The Eton Street (western) elevation features three storey tower wings on the northern and southern ends which flank the two-storey central portion. These wings feature a rendered brick façade on the ground floor, and a facebrick façade on the upper storeys, with rendered brick quoins extending to the eave line. The central section of this western elevation is a two-storey segment with a flat metal roof behind a rendered parapet featuring the inscription 'Sutherland Intermediate School.' All elevations of the building feature vertically proportioned timber double hung windows with brick lintels and sills, though the eastern elevation features these windows in sets of two.

The northern part of the site, at the corner of Flora and Eton Streets, is occupied by Block B. This is also known as the site's "original building" as defined in local heritage item 3618. The following physical description has been extracted from the State Heritage Inventory (SHI) form for the item 'Sutherland Primary School, including original building and grounds' (item 3618).⁵

A one and two storey, freestanding school building that is part of a group, that dates from the early Federation period (1892), within the key period of significance of the area. The building displays features of the late Victorian and Federation styles, and is set on a wide corner site that has been amalgamated and has retained some of its historic context. The building is set back approximately 5 metres from Flora Street.

...

The façade presents a complex asymmetrical elevation and is constructed of face brick, partially painted, on a stone and rendered masonry base course. Single storey wings are weatherboard clad on brick base course with hipped and skillion roofs. The primary roof is gabled with a medium pitch, and has boxed eaves. The roof is clad in corrugated sheet metal and features battened gable end detail and ventilators. The date of building is recorded in the gable end, "Public School 1892".

A verandah wraps around the building and has been infilled with weatherboard. The doors are located in a portico and are pairs of timber boarded leafs. Fenestration comprises pairs of vertically proportioned timber multipane, double hung windows, some with highlights.

Blocks D, E, G, H & I are all timber weatherboard classrooms with gabled corrugated roofs. Buildings D and E are similar in shape and design, featuring original single hung timber windows (Block D features textured glass panes) and timber brackets supporting the roof. These buildings also feature unique vertical weatherboards to the façades (similar to slab buildings), unlike other later weatherboard classrooms built on the site that have horizontal weatherboards. This suggests that these two buildings were built at the same time. Aerial Imagery from 1930 shows these structures on site, indicating that they are close to 100 years old. Due to the existence of original fabric, shape and form, and the fact that they have been operational classrooms for almost 100 years, these classrooms may have some heritage significance and are considered contributory to the heritage item.

Buildings H and I located on the corner of Eton Street and President Avenue are all built upon brick columns. These buildings feature timber sash single hung windows. Building H appears to feature an extension with verandah. These are considered neutral buildings within the heritage item. Other neutral

⁵ SHI, 'Sutherland Primary School', Item ID 2440224.



buildings include the contemporary toilet block (Block K) and the canteen building (Block J) which is proposed for removal to accommodate the new hall.

The following description of the grounds of the school is extracted from the aforementioned listing for Block B (item 3618).

The site has a fence of metal palisade on a brick plinth approximately 2.2 metres high, which detracts from the setting of the place. The site also features several subsidiary buildings and structures, which are of a later date and do not detract from the setting of the place. The site is large and informally landscaped, and features mature trees and large areas of bitumen, and provides an appropriate setting for the structure.

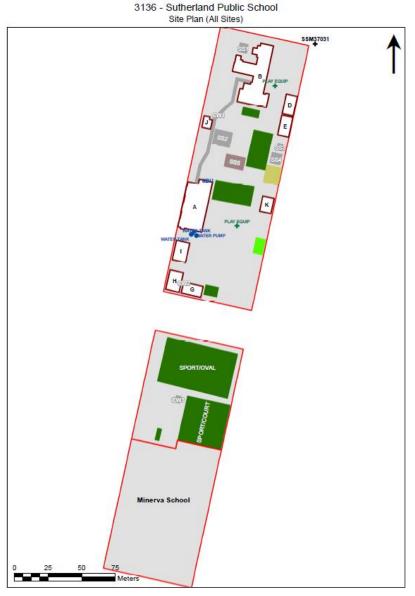


Figure 11: Site Plan for Sutherland Public School, showing location of the buildings.





Figure 12: Sutherland Public School Block A (local heritage item 3614), western and southern elevations.



Figure 13: Western elevation of Block A building (item 3614).





Figure 14: Northern elevation of Block A (item 3614).



Figure 15: Eastern elevation of Block A building (item 3614).





Figure 16: Southern elevation of Block B building (heritage item 3618).



Figure 17: Eastern elevation of Block B (item 3618).





Figure 18: View of painted brick elevation of Block A building, near staff carpark (north-western corner of school).



Figure 19: Western elevation of Block D building.





Figure 20: View of original features of Block D building, including single hung timber windows (with glazed panes) and timber brackets.



Figure 21: Western elevation of Block E building.





Figure 22: View of original features of the Block E building including single hung timber windows and timber brackets.



Figure 23: View of Block K toilet block and playground equipment on Merton Street boundary.





Figure 24: View facing south of the grounds of Sutherland Public School.



Figure 25: View facing south of Blocks G, H and I on the south-western corner of the school.





Figure 26: View facing north from Block A (item 3618) of the covered walkway, covered paved area and canteen building (Block J), where the medium hall with canteen is proposed to be constructed.



Figure 27: View of covered walkway, covered paved area, Block J and edge of staff carpark, where the new medium hall with canteen is proposed to be situated.



3. HISTORICAL OVERVIEW

3.1. Brief Aboriginal History

The following history has been extracted from Sutherland Shire Council website:6

Prior to European settlement the region was home to an Aboriginal community, the Gweagal people, a Dharawal speaking clan.

Evidence from Curracurrang, an area in the Royal National Park, shows occupation dates from about 8,200 years before present, making it one of the oldest coastal sites in the Sydney region.

The Gweagal people lived mainly by the salt water bays and estuaries of Port Hacking, they also used the fresh water resources of the upper Hacking River, Heathcote Creek and the Woronora River.

The Gweagal people were said to be the guardians of the sacred white clay pits on their territorial land, now known as the Kurnell Peninsula. They used the clay to make body paint, medicine and when mixed with local berries it was also used as a dietary supplement.

The tribe also looked out for whales from the Kurnell Peninsula. The whale was the dreaming figure for the Dharawal and an integral part of their community and beliefs. The connection appears to be the role the whale played in hunting activities, as 'bringers of vast foods'. Carvings of their totem still exist on the plateaus where the elders once looked out for the whales to arrive.

Dharawal rock paintings, engravings, stencils, grinding grooves, shell middens and rock shelters are present throughout the Shire.



Figure 28: Map of Indigenous Australia: approximate location of the subject site within Tharawal (or Dharawal) lands is indicated with a blue star. (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).

⁶ Sutherland Shire Website, 'Aboriginal History', available from: https://www.sutherlandshireaustralia.com.au/about-the-shire/our-heritage/aboriginal-history/#:~:text=Prior%20to%20European%20settlement%20the,sites%20in%20the%20Sydney%20region.



3.2. Brief Suburb History

The following history of the suburb of Sutherland has been extracted from *The Dictionary of Sydney*, prepared by Helen McDonald in 2008:⁷

Much of what is now Sutherland Shire was originally land grants purchased over a period of time by Thomas Holt. The South Botany Estate, as it was known, was an estimated 12,000 acres (4856 hectares) and was divided into 11 paddocks. Those sections of the estate that were destined for the Sutherland township subdivision were part of the Woronora Paddock and the Gymea Ground Paddock. The Gymea Ground Paddock was noted for its forest timber, ironbark, stringybark, red and white gum, blackbutt, bloodwood and turpentine...

In 1865 Parkinson surveyed what was the Illawarra Road from Tom Ugly's Point to the South Coast. The western boundary of the Holt-Sutherland Estate had the 'main road to Wollongong passing through it as well as the road to Liverpool which crosses the (Woronora) river.' By 1873 it was decided to build a railway line from Sydney to the Illawarra. In 1879, 18,000 acres (7284 hectares) of dedicated land, to the south of Port Hacking and close to the proposed line, were opened as a national park for public recreation. The potential to increase the numbers of tourists who were easily able to take day-trips from the city after the line opened was an obvious benefit. In addition, it provided employment opportunities within the park and an incentive for permanent settlement in the surrounding area.

After lengthy debate and public meetings, the railway route was officially approved in 1881. As the route passed through a portion of the Holt-Sutherland Estate an opportunity for a subdivision was created...

In 1881 Thomas Holt subleased most of his estate to a company named the Holt-Sutherland Estate Land Company which was formed primarily to prepare and administer the land for settlement. The first release was at Sylvania and in October 1881 the company's surveyor, Curtis, was asked to submit a design for a proposed township to the south-west of the Sylvania subdivision. In November it was completed and at the request of the company directors the subdivision was named Sutherland.

In February 1882 the company made the land available for sale as the Township of Sutherland (Figure 29). The largest purchaser of the land was John Kennedy Doyle of Tamworth. However he overstretched his finances and was declared bankrupt in 1884. Speculation rather than settlement was the initial interest in this subdivision.

In 1868, the land close to what would become Sutherland shopping centre was described as mostly 'too rocky or too poor for the plough.' It was not part of the Holt-Sutherland Estate but remained government land, referred to in a report prepared for Thomas Holt. This land was purchased as two portions by Samuel Gray in 1878. Gray had been the member of the Legislative Assembly for Illawarra and had favored [sic] the construction of the Illawarra railway line. In 1885 he sold the land to the Intercolonial Investment Land and Building Company. The railways decided to site the station in the Intercolonial subdivision rather than in that of the Holt-Sutherland Estate Land Company. The railway line to Sutherland was opened in December 1885. The Intercolonial Investment Land and Building Company offered their estate, on the eastern side of the railway line, also known as Sutherland Township, for sale in April 1886. The Holt-Sutherland Estate Land Company subdivision, on the western side of the railway line, was offered for sale in September 1887. A difference between the land offered by the two companies was that the Intercolonial land was freehold and the Holt-Sutherland land was on a 99-year leasehold...

After the railway line was opened, a spur line to the National Park was built in 1900. A proposal to open a steam tramway to the seaside town of Cronulla was on the drawing board for some years before it opened in 1911. Sutherland Tramway League, made up of mostly Sutherland business men and residents, were a rival faction to those groups from the Cronulla and Kogarah area lobbying for a route which would suit their geographical locations. To the benefit of the Sutherland township, the route chosen commenced at Sutherland railway station and ended at

⁷ Helen McDonald, 'Sutherland', *The Dictionary of Sydney*, 2008, available from: https://dictionaryofsydney.org/entry/sutherland#ref-uuid=2d48dc37-435b-3383-9673-9948524ccee8.



Shelly Park in Cronulla. The future of Sutherland as a transport node was assured as most commuters would have to pass through Sutherland to reach destinations within the shire.

3.3. History of the Subject Site

The following history of the Subject Site has been extracted from the previous *SRISI*: *Sutherland Public School* prepared by CPH in November 2023.

The subject site forms part of 61 acres and 2 rods that were originally granted to Thomas Holt and became part of the Holt-Sutherland Estate, which was auctioned off in the early 1880s (Figure 29).

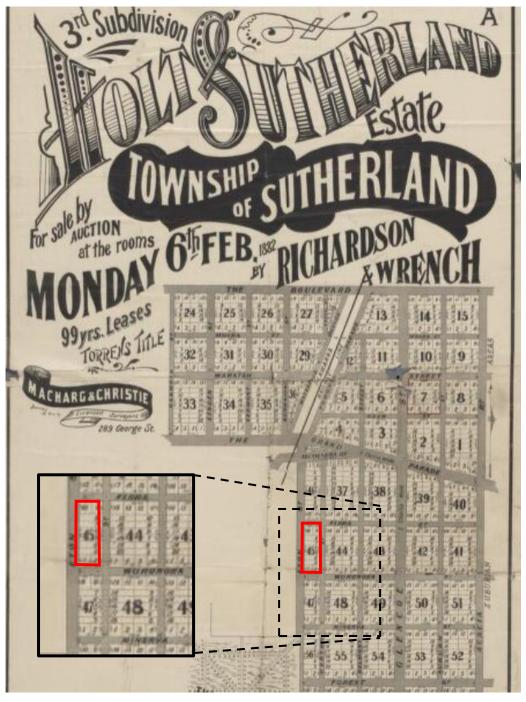


Figure 29: 3rd subdivision of the Holt-Sutherland Estate. The portion of Sutherland Public School is indicated in red. Source: Richardson & Wrench, '3rd Subdivision of the Holt-Sutherland Estate'. 1882, available from: https://nla.gov.au/nla.obj-230502906/view.



The following history is extracted from 'Government Schools of NSW 1848-1998', NSW Department of Education and Training 1998, sourced from the NSW State Heritage Inventory (SHI) form for 'Sutherland Primary School':8

Sutherland Public School was established as a primary school in the County of Cumberland in March 1887

In April 1926 the school became a 'primary plus' school when secondary school subjects in the commercial syllabus were also available. The school was an 'intermediate high school' from 1 January 1928 until December 1959. During this period the high school syllabus was available for the first three years of secondary school to intermediate certificate level.

From January 1960 the school returned to being a public school teaching the primary school syllabus only.

The following history is extracted from Sutherland Public School Website:9

Sutherland was subdivided in 1886. The newly opened railway gave easy access to Sydney. There were only 4 permanent buildings. Three were for the railway whilst the fourth was a general store. Mr Bramley the store owner was instrumental in organising a petition by the settlers to the government of the Colony of NSW to establish a school. Following a visit from an Inspector for the department of Public Instruction it was determined that the population be sufficient to maintain a small public school.

It had been built at a cost of £145 (\$290). The first teacher was Maria Meyer.

The first school, constructed of weatherboard and corrugated iron, a brick chimney, one cupboard for stationery and six benches for seating, was opened on 6 March 1887.

By 1892 there were 105 children on the roll.

Following a deputation to the Minister, B block (two room brick building) was built along with the teacher's house at the lower end of the playground where the canteen stands today. There was a vegetable garden and orchard which boasted 17 fruit trees on the grassed area where the flagpole stands today. By 1895 growth in enrolments meant that the additional rooms were soon needed for B Block (Figure 32). These additions didn't happen till 1917-18. In the interim, classes were taken in the St John's Hall.

Due to the heavy undergrowth and ringbarked trees the school was often frequented by many snakes including red belly black snakes, brown snakes and a death adder...

The first iteration of Sutherland Public School in 1887 appears to have been sited at the north-western corner of the allotment, fronting Eton Street. This is because an 1887 Subdivision Map for the 'Sutherland Township Estate' shows the location of the Public School Building fronting Eton Street (Figure 30). This approximate location of the original building is today occupied by the staff carpark. This first building fronting Eton Street is also confirmed in the April 1976 Quarterly Bulletin of the Sutherland Shire Historical Society.

No provision was made for a Public School in this subdivision, but a school was erected on the corner of Eton and Flora Streets on what was then described on the Company's man as Holt-Sutherland Estate Leasehold. The school was a small one-roomed weatherboard building with a corrugated iron roof. It faced Eton Street and was opened in March 1887. Mrs. Maria Meyer was the first teacher, and is shown in the illustration with her pupils [Figure 31].

⁸ SHI, 'Sutherland Primary School', Item ID 2440223.

⁹ Phil Bailey, 'Sutherland Public School – Our Heritage', available from: https://sutherland-p.schools.nsw.gov.au/our-heritage.html.



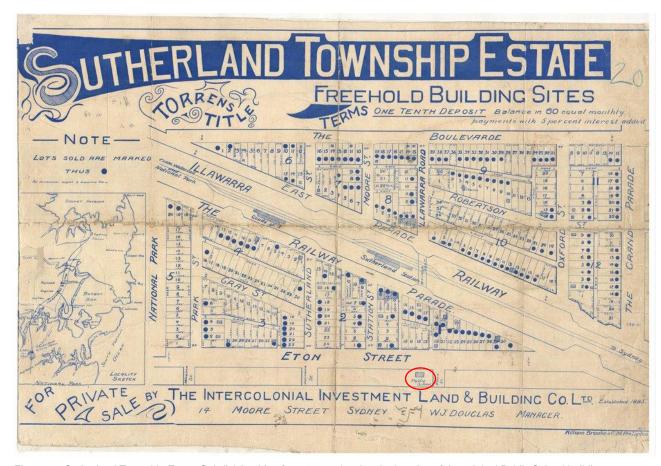


Figure 30: Sutherland Township Estate Subdivision Map from 1887, showing the location of the original Public School building on the north-western corner of the site (indicated in red). This is today occupied by the staff carpark. Source: Intercolonial Investment Land & Building Co Ltd, 1887, extracted from Sutherland Shire Libraries, 'Sutherland Township Estate: Freehold Building Sites', available from: https://localhistory.sutherlandshire.nsw.gov.au/nodes/view/218.



Figure 31: Illustration of the first school building at Sutherland within the April 1976 Quarterly Bulletin of the Sutherland Shire Historical Society.



The following history is extracted from the NSW SHI from for 'Sutherland Primary School':10

Sutherland School opened on this site in 1887... At that time, apart from the railway station and level crossing keepers' houses there was only one other permanent building in the Sutherland settlement. The nearest neighbouring schools were at Hurstville and Heathcote.

Between 1928 and 1958 it also served as the first and only high school. Sutherland Intermediate High School provided education for students drawn from as far away as Penshurst, Stanwell Park, Cronulla and Menai. At the peak in 1958 enrolments of 1790 students were recorded across the four departments. Further enrolments were refused. The school campus sprawled across both sides of President Avenue. The boys [sic] department was located on the site where Minerva School is today. 1959 saw the secondary department transfer to form the nucleus of Port Hacking High.

The earliest aerial photographs of the site, taken in 1930, show the school building facing Eton Street (opposite Boyle Lane) extant. The aerial photographs of 1955 evidence construction of building at the corner of Eton Street and President Avenue, and fronting President Avenue. By 1970, the aerial photographs show several buildings removed [Figure 40].

Articles from Sydney Morning Herald dated 11 May 1892, p11 and 24 July 1923, p10 note poor condition of Sutherland Public School Buildings and an offer of P & C to provide labour to erect a manual training room, respectively.

Sutherland Shire Libraries hold photographs of the site dating from Ca 1930's/1940's and 1934, which show children in front of the school building [Figure 36].

Sutherland Council Building and Property Files include:

Excerpts from history of the school unreferenced including plans and the following text:

In February 1892 the school attained Class VI status with an enrolment of ninety nine in two rooms. In May a deputation went to the Minister asking for a new building and a teacher's residence. Because of being built on woodpiles instead of brick piers the old building had been eaten by white ants and had become dilapidated. There were 105 on roll, and the parents told the Minister that within the previous three months twenty or thirty new families had settled in the area.

Over crowding forced the renting of St John's Church of England Church Hall across the road until additions were built in 1917-1918. To the existing four rooms were added two more north of the 1892 building, with ninety six seats, so that the staff of six now had a classroom each. The average attendance was about 230.

In 1924 the teacher's house was converted to a cookery school for continuation pupils. A deputation to the Minister said that Sutherland was one of the most important centres on the Illawarra Line, permanent and growing.

A Manual training room was erected on the tennis court by parents, using materials supplied by the Department. The demand for the eight primary schools in the Shire for secondary education, even though largely non-academic, was such that classes had to be held in both the Congregational and Church of England Church Halls, and later the Picture Theatre an [sic - and] the Methodist Hall before additions were complete. In 1924 a new four-roomed building together with a headmaster's room and two staff rooms were erected. As always the existing buildings were the scene of a continuing war on white ants. A letter from the Shire Clerk in 1927 drew attention to the dilapidated condition of the fence. Land south of President Avenue was resumed for addition to Sutherland Public School Site in 1947.

¹⁰ SHI, 'Sutherland Primary School', Item ID 2440223.





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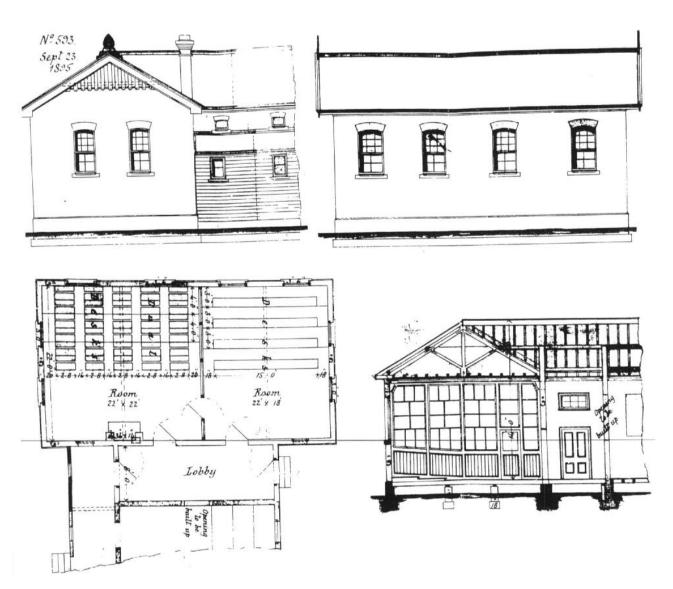


Figure 32: Plans of 1895 additions to Block B. One room was fitted with dual desks for infants and the floors were 'stepped' upwards towards the back of the rooms so that all children could see the blackboard. Source: Statement of Environment Effects for Eton Street, Sutherland Public School prepared by Krallis Architects in 2007, p.5.





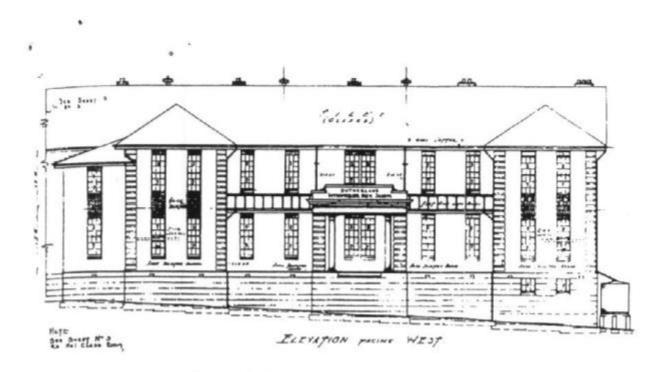


Figure 33: West elevation of Block A, undated. Source: Statement of Environment Effects for Eton Street, Sutherland Public School prepared by Krallis Architects in 2007, p.11.



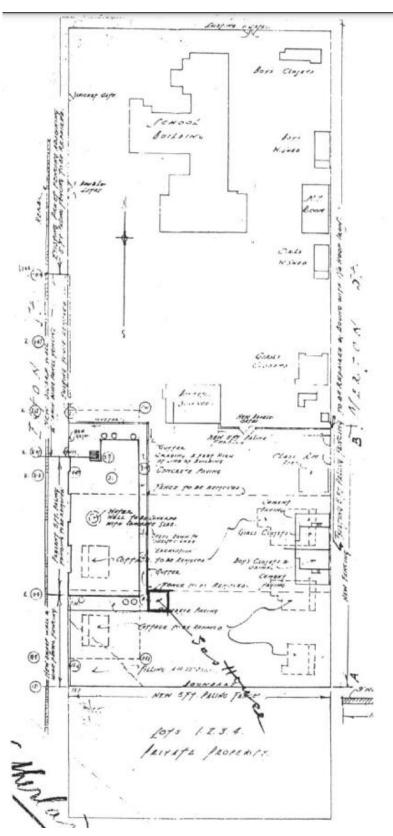


Figure 34: Undated block plan. Source: Statement of Environment Effects for Eton Street, Sutherland Public School prepared by Krallis Architects in 2007, p.11.





Figure 35: Photograph of the c.1892 original classroom building of Sutherland Public School (Block B). Photograph dates from 1910-1920. Source: Sutherland Shire Libraries, 'Sutherland Public School, view of the exterior building, ca. 1910s (between 1910 and 1920)', available from: https://localhistory.sutherlandshire.nsw.gov.au/nodes/view/1228.



Figure 36: Photograph from 1934 of students outside the recently constructed two storey Intermediate School building (built c.1929). Source: Sutherland Shire Libraries, 'Sutherland Public School students 1934', available from: https://localhistory.sutherlandshire.nsw.gov.au/nodes/view/1370.



It is not known if the existing hall within Building A (AR0008) was incorporated in the building when it was first constructed, however it is evident that a hall was present in the building by 1935-1936. Two mentions of a school hall at Sutherland Intermediate High School could be found, the first in February 1935 (for a meeting between the Old Student's Union)¹¹ and the second in April 1936 (for the presentation of a clock from the P & C Association to the headmaster of Sutherland Primary School).¹² This suggests that Building A has had a hall room for at least 89 years, and it is likely that AR0008 is the same hall room, however further research is recommended to confirm this.

The earliest aerial imagery of the subject site dates from 1930 (Figure 37), though this is not as clear as the 1943 imagery, which shows a school site well established (Figure 38). The 1930 imagery identifies Buildings A and B (item 3614 and 3618 respectively), as well as Buildings D and E (vertical weatherboard façade classrooms on the eastern boundary). 1961 aerial imagery of the site shows extensive development undertaken to cater to the growing pupil population of the school. The President Avenue elevation of the school received several additional classroom buildings, including Blocks G, H and I which survive to this day (Figure 39).

The aerial imagery from 1970 shows the fully constructed Minerva School to the south of the school (Figure 40). By 1983 it appears that the Block J canteen may have been established within the school, however the imagery is not clear (Figure 41). The 1990 aerial imagery however shows it clearly established (Figure 42). The covered pathways, play areas and play equipment within the school appear to be contemporary constructions (21st Century).

11 The Propeller, 'Sutherland High School', 14 February 1935, p. 7, available from: https://trove.nla.gov.au/newspaper/article/235360130.

¹² The Propeller, 'Sutherland Presentation', 23 April 1936, p. 4, available from: https://trove.nla.gov.au/newspaper/article/235633537.



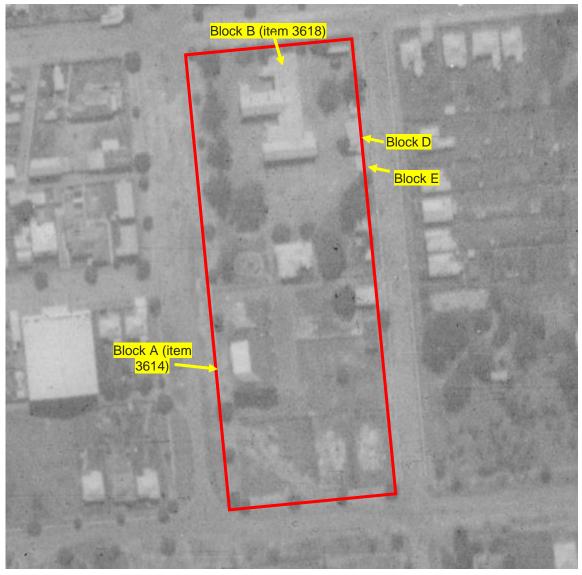
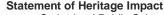
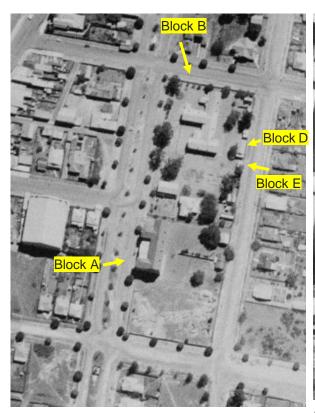


Figure 37: 1930 Imagery of the site, showing existence of Block E and D on the site's eastern boundary. Block A was just constructed in 1929, whilst Block B is the oldest on site (c.1892).







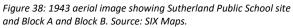




Figure 39: 1961 aerial image showing Sutherland Public School site. Source: NSW Government Historical Imagery.

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Figure 40: 1970 aerial image showing Sutherland Public School site with several buildings being removed. Source: NSW Government Historical Imagery.



Figure 41: 1983 aerial image showing Sutherland Public School site. Block J (Canteen) may have been built, though imagery is not clear. Source: NSW Government Historical Imagery.



Figure 42: 1990 aerial imagery of Sutherland Public School (indicated in red). Block J (Canteen) is clearly visible. Source: NSW Government Historical Aerial Imagery.





4. ASSESSMENT OF SIGNIFICANCE

4.1. Understanding Heritage Significance

Each place is unique and has its own combination of values. Therefore, before making decisions about the future of a heritage item, it is essential to understand its heritage values so that these will be retained when making future decisions about the place. The statement of heritage significance summarises an item's heritage values.

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 Sutherland Public School before making decisions about the future of the subject site. This then leads to decisions that will 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

4.2. Established Significance - Sutherland Public School

The subject site (Sutherland Public School) contains two separate heritage items identified under Part 1 of Schedule 5 of the *Sutherland Shire LEP* 2015 as having local significance:

- Former Sutherland Intermediate High School building (now part of Sutherland Primary School), 38–54 Eton Street, Lots 6-10, Section 45 DP 802, item no.3614.
- Sutherland Primary School, including original building and grounds, Flora Street (corner of Eton and Merton Streets), Lot 5, Section 45, DP 802; Lots 1–10, DP 6600, item no.3618.

The following statement of significance is extracted from the SHI database for 'Former Sutherland Intermediate High School building (now part of Sutherland Primary School)' (item 3614):¹³

The site, as the first high school in Sutherland, evidences the development of education in the Sutherland Shire. The building is a fine example of the Interwar free classical style. The building is well known to the local community. The building is a rare example of an Interwar free classical style in the area. The building has a high level of integrity.

The following statement of significance is extracted from the SHI database for 'Sutherland Primary School, including original building and grounds' (item 3618). ¹⁴ As mentioned previously, this "original building" is identified as Block B, fronting Flora Street.

The site evidences the development of education in the Sutherland Shire. The building is a fine example of the late Victorian / Federation style. The building is well known to the local community. The building is a rare example of a late Victorian / Federation style in the area. The building has a high level of integrity.

As identified at Section 1.3 of this SOHI, Sutherland Public School is listed twice on the Section 170 Department of Education Conservation Register as 'Sutherland Public School – Building B00B and

SHI, Sutherland Primary School, ID 2440224, available from: Item https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=2440224. ID Sutherland Primary 2440223. available from: SHI. School. Item https://www.hms.heritage.nsw.gov.au/App/ltem/ViewItem?itemId=2440223.



Grounds', 15 and 'Sutherland Public School – Building B00A.' 16 These listings on the SHI do not contain a Statement of Significance, thus they could not be extracted.

4.3. Assessed Significance - Sutherland Public School

In the previous SRISI: Sutherland Public School, CPH prepared a combined assessment of the Heritage Council's significance criteria. This utilised the NSW DPE guidelines for *Assessing Heritage Significance*, 2023.

4.3.1. 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).

Established Assessment – Item 3614	Established Assessment — Item 3618 (Building A and Grounds)	CPH Assessment
The site, as the first high school in Sutherland, evidences the development of education in the Sutherland Shire.	The site evidences the development of education in the Sutherland Shire.	Sutherland Public School has historic significance for providing physical evidence of the development of education in the Sutherland Shire. The school was officially established in March 1887 after local residents had petitioned the Government of the Colony of New South Wakes for a number of years. Building B is the oldest surviving classroom on site, having been constructed in 1892. This was modified in the early 20th Century to its current configuration to cater to increased pupil enrolment that came about post-WWI. Between 1928-1958, the school was known as Sutherland Intermediate School, providing education to primary and secondary school aged children. This was provided in Building A, a two and three storey building which was constructed in c.1929. This building contains a hall room (AR0008) that has acted as a communal room for the school for at least 88 years (since 1935). Around this time, the school also received a number of subsidiary classrooms and structures. Buildings D and E may have been built for the Intermediate High School – at the same time as Building A or shortly after. The three buildings appear on the 1930 aerial imagery (Figure 37). Buildings H, I and G do not appear on 1943 imagery (Figure 38) but do appear on 1961 aerial imagery (Figure 38). The high enrolment rate (reportedly 1,790 students by 1958) facilitated the development of the school, By 1960, the school transitioned back into a Primary

NSW SHI, 'Sutherland Public School – Building B00B and Grounds', Item ID 5065773, available from: https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=5065773.
 NSW SHI, 'Sutherland Public School – Building B00A', Item ID 5065772, available from: https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=5065772.



Established Assessment – Item 3614	Established Assessment – Item 3618 (Building A and Grounds)	CPH Assessment
		School, and has continued to operate as such since.
		The school demonstrates the expansion of Sutherland's population and the increased need for education across different eras, particularly post-WWI and post-WWII.

The site meets this criterion at the local level.

4.3.2. 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).

Established Assessment – Item 3614 (Building B)	Established Assessment – Item 3618 (Building A and Grounds)	CPH Assessment
N/A	N/A	There is no identified historical association significance with Sutherland Public School. Further investigation into the figures of Sutherland may reveal links with Sutherland Public School.

The site does not meet the criterion in this regard.

4.3.3. 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).

Established Assessment – Item 3614 (Building B)	Established Assessment – Item 3618 (Building A and Grounds)	CPH Assessment
The site has landmark and scenic qualities. The building is a fine example of the late Victorian / Federation style.	The site has landmark and scenic qualities. The building is a fine example of the Interwar Free Classical style.	The buildings within Sutherland Public School have aesthetic significance for demonstrating evolving architectural trends and styles utilised in the area. The former Intermediate School Building (Block A) demonstrates inter-war Free Classical Style architecture, with its symmetrical façade, stone and facebrick finish and vertically proportioned timber double hung windows. Block B meanwhile dates from the early Federation period (1892) and features a complex asymmetrical elevation constructed of facebrick on a stone and rendered masonry base course. These buildings are visually distinctive and positively contribute to the streetscapes of Eton Street and Flora Street.

The site meets this criterion at the local level.



4.3.4. 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.

Established Assessment – Item 3614 (Building B)	Established Assessment – Item 3618 (Building A and Grounds)	CPH Assessment
The building is well known to the local community.	The building is well known to the local community.	The social significance of Sutherland Public School is not known at this time and requires further consultation with the local community to ascertain its significance, if any.

The site may meet the criterion in this regard at the local level but may be further investigated.

4.3.5. 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).

Established Assessment – Item 3614 (Building B)	Established Assessment – Item 3618 (Building A and Grounds)	CPH Assessment
N/A	N/A	There is no known technical or research significance associated with Sutherland Public School. However, there may be potential for European archaeology to be present within the north-eastern corner of the school in the form of building foundations and post holes and fills. This area is buried beneath the current car park, which is not proposed to be excavated. Regardless, evidence of these post holes would be considered as research significance as they would provide evidence of how the first school in the Sutherland township was erected.

The site would likely meet the criterion in this regard at the local level.

4.3.6. 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).

Established Assessment – Item 3614 (Building B)	Established Assessment – Item 3618 (Building A and Grounds)	CPH Assessment
The buildings are rare examples of a late Victorian / Federation style in the area. The building has a high level of integrity.	The building is a rare example of Interwar Free Classical style in the area. The building has a high level of integrity.	The Sutherland Public School complex is considered a rare surviving school from the late 19th Century which demonstrates the urban development and population trends of the Sutherland area. It is the oldest school in the Sutherland Shire that is still operational and is one of only two schools listed as heritages items on the Sutherland LEP 2015. In addition to being one of the oldest



Established Assessment – Item 3614 (Building B)	Established Assessment – Item 3618 (Building A and Grounds)	CPH Assessment
		school buildings in the LGA, the original classroom (Building B) is also one of the oldest surviving buildings in Sutherland township.

The site meets this criterion at the local level.

4.3.7. 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).

Established Assessment – Item 3614 (Building B)	Established Assessment – Item 3618 (Building A and Grounds)	CPH Assessment
N/A	N/A	Sutherland Public School is representative of the urban development of the Sutherland area, with its expansion tied to the area's increasing population overtime. As the population of Sutherland increased, the school followed through the construction of additional buildings (including the two storey B00B) and acquisition of additional land. The school's expansion therefore is representative of the suburb of Sutherland's growth.

The site meets this criterion at the local level.

4.4. Significant Trees

Within the schoolgrounds are a number of mature trees which contribute to the significance and setting of the heritage items on site. This is particularly so for the heritage item 'Sutherland Primary School, including original building and grounds' (item 3618) as the landscape grounds of the site is specifically identified as having heritage significance. As per the SHI form's physical description of item 3618:

The site is large and informally landscaped, and features mature trees and large areas of bitumen, and provides an appropriate setting for the structure [Building B].

These mature trees contribute to the setting of heritage item 3618 ('Former Sutherland Intermediate High School building (now part of Sutherland Primary School)', therefore they are considered to be of heritage significance. The site has been operated as a school since 1887, and the trees which have survived on site for at least 80 years (based on historical aerial imagery) are inextricably associated with the school and its setting. Potentially significant trees were previously identified in the European Heritage SRISI prepared by CPH (Figure 43 and Figure 44).





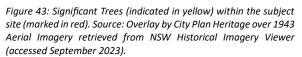




Figure 44: Significant Trees (indicated in yellow) still present on site within the subject site (outlined in red). Source: Overlay by City Plan Heritage over Aerial Imagery retrieved from SIX Maps (accessed September 2023).



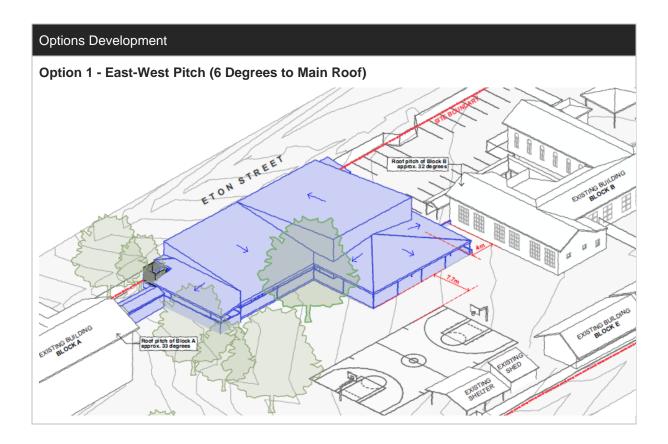
5. HERITAGE IMPACT ASSESSMENT

5.1. Options Development

The proposed development evolved over time and considered a number of options, particularly concerning the roof form of the proposed new hall building. Previously in the *SRISI: Sutherland Public School* (CPH, November 2023), the following recommendations about roof form for the new hall were provided [emphasis added].

The new hall development should utilise materials that are sympathetic to the heritage values of the adjacent heritage items and historic structures, whilst ensuring it does not imitate these historic features. In general and in accordance with building standards, the new development could utilise facebrick to match the appearance of Building A, or a light and earthy colour paint that is sympathetic to Building B. **The roof of the new hall could be corrugated metal and employ a hipped or gabled form**. Windows could be multipaned single hung and utilise sympathetic materials (eg. Powder coated metal or aluminium frame). The new hall should not necessarily imitate the features and materials of these historic buildings on site (eg. No vertical timber boarding or textured window glazing like that present in Building D), however it should be designed to be respectful and in conformity with the visual character and setting of the school.

Investigation was undertaken into employing a gabled or hipped roof form for the new hall so that it is in conformity with the rest of the school buildings. The following options for roof form were identified, with positive and negatives of each option discussed.





Options Development

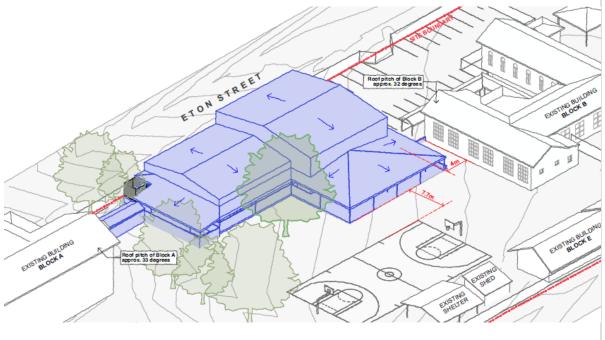
Positive:

- 6 degrees roof pitch aligns more closely with the steeper pitched roof forms of the heritage buildings Block A (approx. 33 degrees) and Block B (approx. 32 degrees).
- No box gutters nor spreaders to lower roofs are required for this option
- Downpipes either to rear of building or to covered walkway
- The highest point of the building remains below the ridge level of the adjacent heritage building (Block B) hence does not undermine its surrounding context
- Mono pitched roofs allow for larger areas available for placement and flexibility in location of PV cells.

Negative:

The character and setting of the heritage items are strongly defined by the gabled roofs across the school site. This proposed roof form is not in keeping with the existing nature of the school and streetscape.







Options Development

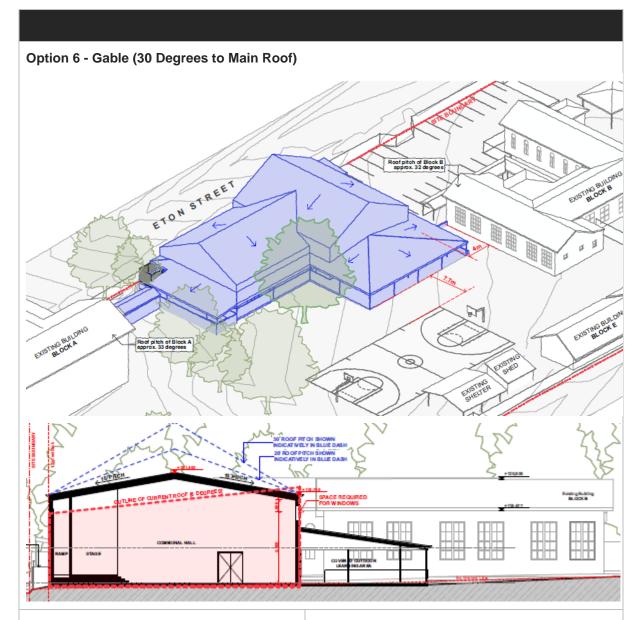
Positive:

- 10 degrees roof pitch aligns more closely with the steeper pitched roof forms of the heritage buildings Block A (approx. 33 degrees) and Block B (approx. 32 degrees).
- No box gutters are required for this option
- Gabled roofs allow for large areas available for placement and flexibility in location of PV cells.
- Gabled roof aligns more with the similar gable roofs of the heritage buildings within the school grounds (B00A & B00B).

Negative:

- Spreaders to the lower roofs are required on the eastern façade which may have a visual impact on the school-facing 'front' of the building.
- The main building mass is based on minimum internal height requirement of 5.6m for the hall as well as an additional 900mm for high level windows to meet daylighting / ventilation requirements (refer to section). As a result, the building mass has increased notably from the current design and the proposed ridge surpasses the ridge height of the adjacent heritage building Block B.
- The massing for the ancillary spaces has increased in volume due to change in roof form.
 This reduces the visual connection between Block A and Block B.





Positive:

- 30 degrees roof pitch aligns more closely with the steeper pitched roof forms of the heritage buildings Block A (approx. 33 degrees) and Block B (approx. 32 degrees).
- No box gutters are required for this option.
- Gabled roofs allow for large areas available for placement and flexibility in location of PV cells.
- Gabled roof aligns more with the similar gable roofs of the heritage buildings within the school grounds (B00A & B00B).

Negative:

- Spreaders to the lower roofs are required on all facades which may have visual impact to overall building.
- The main building mass is based on minimum internal height requirement of 5.6m for the hall. As a result, the building mass has increased notably from the earlier options' design and the proposed ridge surpasses the ridge height of the adjacent heritage building Block B. The indicated roof form is not appropriate in scale and undermines the surrounding buildings and context.
- A 30 degree roof pitch has been shown indicatively in blue dash (refer to section) to demonstrate the roof form of proposed hall if the steepness of the pitch of the surrounding





heritage buildings (Block A and B) were adopted. The indicated roof form is not appropriate in scale and undermines the surrounding buildings and context.
The massing for the ancillary spaces has increased in volume due to change in roof form. This reduces the visual connection between Block A and Block B.

5.1.1. Preferred Option

From a heritage perspective, despite being different from the previous advice in the *SRISI: Sutherland Public School*, the preferred roof form option is that of the East-West Roof Form. After investigating the required footprint of the hall with the size, overall height and the large span that the hall roof will be covering, it was evident that any hipped or gabled roof form would be a dominant element introduced between the two heritage buildings. Obtaining comparative roof form perspectives and sections proved that the gabled roof forms, even at the shallower 10 degrees pitch, would reach and go over the ridge height of Block B, hence the preference was made in favour of the current combination of multi skillion style pitched roof form to reduce the dominance of the new Hall between the two heritage buildings. This was thought to be a better solution in the context of the heritage buildings along the Eton Street presentation, retaining Block A and Block B as the highest buildings on the site. In this case, the new Hall would not compete with their scale and streetscape views. Ultimately, this roof design will create a more subtle and simpler building mass that would not overwhelm the heritage buildings at either side and would allow for its visual impact being lesser than if it was in the gabled or hipped roof form.

Based on the street context of the new Hall where it will be observed by the passerby, and existence of various building types and high-rise contemporary developments, the introduction of non-gabled roof form in order to reduce its dominance across the school streetscape (especially between the two heritage buildings) would have a minor impact from a heritage point of view. The use of gabled roof forms would provide some benefit, but in this context for the hall it would provide a more dominant and visually competing new building mass between the two heritage buildings that would easily be seen by the passerby. As such, CPH supported the East-West Option for the roof form of the new hall.

5.2. Heritage Design Recommendations

In reaching the proposed design, a number of heritage concerns were identified that required assessment. These have been addressed below.

5.2.1. Additional Articulation of West Elevation

In response to the heritage comments of CPH for the East-West roof form for the new hall, the following was raised by Alyce Haast, Senior Heritage Officer at SINSW, in correspondence dated 5 November 2024.

In absence of a gabled roof form option, the heritage team has identified the need for additional articulation within the street fronting facades of the built form (including new entry gate to the north of the new hall).

Our internal heritage architect has recommended consideration be given to either additional colour variation (particularly focusing on the new entry way and the vertical panelling) or shadow line variation to respond more closely to the existing vertical nature of buildings across the site in addition to consideration of physical articulation options.

The drawing of the western elevation of the school by BKA Architecture provides sufficient information to inform a response to this request. This western elevation is visible below at Figure 45.





The western elevation of the school shows that the majority of the western elevation of the new hall building will be obscured by existing mature tree plantings along Eton Street. This means that significant façade articulation and the introduction of colour will not achieve the desired or intended outcome for the streetscape. The proposed material of the façade, featuring metal cladding with a strong vertical profile and groove lines, already provides a sufficient and defined architectural presence for a new hall that would have a different architectural style and language than a school building. The addition of more articulation will not necessarily benefit the streetscape as it will already be visually obscured by the tree plantings, which already provide interest to the school's western boundary. It is considered that the articulation through use of various materials across the building facades provide some level of articulation and interest in line with the nature of the hall building.

Additional options for façade articulation were considered but not recommended for the western elevation of the new hall. This included articulation in the forms of window openings along the western façade, reflecting gable forms, and barge capping. Ultimately, these forms of articulation would not add meaningful value to the western elevation as they would not serve any functional purpose and add more bulk to the scale of the hall building of which would largely be obscured by the current tree plantings along Eton Street.

Where the building is not obscured by trees (for example, the northern façade of the hall as viewed from Eton Street), there is potential to incorporate appropriate signage, like that of the school name and emblem, to provide articulation and interest to the façade. The render at Figure 46 provides an example of such articulation.

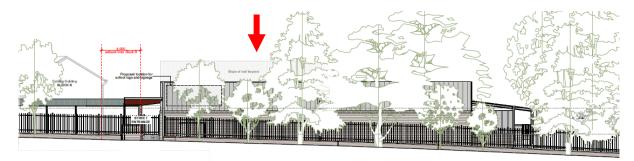


Figure 45: Western elevation of Sutherland Public School, with the western elevation of the proposed hall (indicated by red arrow) obstructed by mature street plantings. Source: BKA Architecture.





Figure 46: Render showing proposed hall in Sutherland Public School, as viewed from Eton Street. Most of the western façade of the proposed hall building is obscured by mature tree plantings, meaning that articulation of this façade will not benefit the streetscape. Instead, articulation could be added in the form of appropriate signage as indicated in the render.

5.2.2. Solar Panel Placement for New Hall

In addition to the western façade of the mew hall, commentary was raised about the potential heritage impact of the placement of solar panels on the main roof of the new hall.

Based on the advice of the electrical engineer and comments from SINSW ESD team, the 6kW array on the main hall roof is included in this proposal due to its ESD benefits (power offset for the building, reducing energy costs, reducing payback period for the system). However, there will be no tilt frame for this array so that the panels can be installed flat against the roof sheets. This will lessen the visual impact of these panels from the street and therefore reduce its adverse impact on the setting of the heritage item. Also, given the height of the roof on the eastern façade and the presence of street trees along this elevation, the visual impact on the streetscape would be minimal. Leaf and litter guards are to be installed around the solar panels to prevent debris building up and to mitigate any maintenance issues.

Additionally, yhe COLA roof was considered for PV, but did not proceed due to the COLA having a lightweight structural system. If PV panels were included on the COLA roof, then the structure would need to be increased in terms of member sizing and steel tonnage, subsequently increasing costs and the bulk of the COLA structure, which would increase visual impact to the nearby heritage building B. Further, the pitch of the COLA roof would require PV installation on aluminum frames, which ultimately creates a greater visual impact in this area, also noting that part of the COLA roof is angled to the south which is not ideal for solar efficiency.

The proposed design of the new hall attempts to keep the COLA form as low and transparent as possible to lessen potential visual impacts towards the heritage buildings (A and B) and their immediate setting.

5.2.3. SOHI Requirements

Additionally, the correspondence dated 5 November 2024 identified the following to be addressed in this SOHI.

With regards to the Statement of Heritage Impact that City Plan would be preparing for the project. Justification must be provided in text to explain why the proposed roof form minimises heritage impact as well as detail on all additional mechanisms (roof pitch, placement of the building, tree retention, colour and articulation of the built form) undertaken to reduce the visual impact of the





new build. The assessment should include reference to the roof form study including the new perspectives prepared to reflect views from the road. It should also include a detailed of options discounted and why they were discounted.

The discussion of the roof form options study and the preferred option is present at *Section 5.1 Options Development* of this SOHI. Additional assessment of the placement of the building, tree retention, colour and articulation, is found throughout *Section 5 Heritage Impact Assessment*. For a combined assessment of the additional mechanisms, refer to *Section 5.2.3 Design Recommendations Assessment* below.

5.2.4. Design Recommendations Assessment

The following non-Aboriginal Heritage Design Recommendations were sourced from the NSW DoE *Heritage Snapshot - Site Opportunities, Risks and Key Constraints* prepared for the proposal (dated May 2023).

Design Recommendations

View to the small scale single-storey Building B00B (1892) from the Eton, Flora and Merton Streets are significant and should not be dominated in location, form, height, scale, massing, materials, finishes, colour, architectural details and landscaping by other structures surrounding or adjacent to Building B00B.

CPH Assessment

The significant views of Building B00B from Eton Street, Flora Street and Merton Street are not compromised or lost with the proposed construction of the new hall. Physically, there is a 4 metre setback from the new building to the heritage building, ensuring there is sufficient space for the original school building to be viewed, interpreted and appreciated from the street.

The varied height of the new hall that is lower than the heights of the heritage buildings is mitigated by design to reduce any visual dominance over these items. This smaller height for the new hall was achieved through the development of the East-West roof option (monopitched roofs). As seen in section 5.1 options development above, employing a gabled roof form(s) would have made the hall a much larger structure and feature within the schoolgrounds, which would have had a visual impact on the significance of Building B.

The materials and colours of the new hall and its associated ancillary structures has been chosen to complement the existing school buildings. The new hall employs a brick base which grounds the building with its surrounding context. This facebrick base is lighter than but complementary to the facebrick façades of Building A and Building B, thereby ensuring the building does not compete with these heritage buildings. The brick base is complimented with a lightweight metal cladding to the upper portion of the hall, which provides material articulation and visual interest to the hall without complicating the facades or detracting from the heritage buildings.

The design of the building also does not attempt to mimic or imitate some of the architectural features of the heritage buildings within the school. For example, distinctive architectural





Design Recommendations	CPH Assessment
	features like the rendered brick quoins on Building A or the vertically proportioned timber multipaned windows of Building B are not replicated in the design, thereby allowing the original elements of these heritage items to continue to be appreciated.
The locating / siting, orientation, footprint, form, massing, scale, height, architectural details, materials, finishes, colours and landscaping of the new multi-purpose hall should be sympathetic to the school's significance and its heritage setting.	The proposed location of the school hall is considered appropriate within the constraints of the school grounds and sympathetic to the heritage values of the site, with the proposed location retaining significant mature trees within the grounds, sufficient setbacks and sightlines to the heritage buildings. The orientation of the hall facing into the school also connects it to the existing school network of buildings, which all also face inwards.
Façade articulation and fenestrations of the new hall should be sympathetic to the architectural details (including texture) and fenestration patterns of Building B00A and B00B. Large areas of blank and/or unarticulated walls should be avoided or minimised.	The elevations of the new hall building are appropriately articulated through various heights and multi skillion roof forms as well as combination of compatible materials to ensure visual interest without being overt. The western elevation of the hall is appropriately articulated for the context of this boundary of the school, being that the majority of this elevation is obscured by mature tree plantings along Eton Street. Significant façade articulation and the introduction of colour to this elevation would not achieve a desired benefit to the streetscape as it would be obscured and not visible. The combination of the brick base and metal cladding at the upper portions provides a sufficiently defined architectural presence in line with the functional nature of the hall that also compliments the nearby heritage buildings. This is because the facebrick façade is inspired by the main bases of the two heritage buildings, while the corrugated metal cladding reflects the similarly corrugated roofs of these heritage buildings.
Sheltered walkways between the new hall and Buildings B00A and B00B must be sympathetic to the architectural details of the heritage buildings. The interface connections must be carefully considered and designed to avoid heritage impacts.	The extension of the covered walkway network from Building B and Building A to the new hall will not overwhelm the heritage items, instead they will create a linked pathway that is similar to how they currently connect with the existing canteen building (proposed to be demolished). The new walkways to connect the hall to the school's network will extend from the previous walkways and not exceed the existing height.
It is noted that design options 2-4 include refit of the existing hall space (AR008) in B00A (1929). Where possible, the proposed refit should maintain the original layout and volume of the	The refit of the existing hall within Building A (AR008) is not articulated in this proposal. This will need to be carefully considered so as to retain the heritage values of the existing space.



Design Recommendations	CPH Assessment
hall. Proposed modifications to the building configuration or architectural elements should be subject to heritage assessment with opportunities identified for the proposed fir out to minimise impact to the heritage value of B00A.	
With exception of a potential covered walkway connection, all Options avoid modification to B00B. Proposed covered walkway interface must be subject to heritage assessment.	

5.3. Potential Historical Archaeology

While this SOHI does not include a full Historical Archaeological Assessment, the likely historical archaeological potential of the site has been considered through the historical phases of development across the subject site. This is to inform an assessment of the likely impact of the proposed development on any potential historical archaeological deposits present within the site.

Based on the historical research, the first iteration of Sutherland Public School was a small weatherboard building that was erected at the north-western corner of the school (intersection of Eton and Flora Streets). This is based on an 1887 Sutherland Township Estate Subdivision map (Figure 30). An illustration of this building was replicated in the April 1976 edition of the *Quarterly Bulletin of the Sutherland Shire Historical Society* (Figure 31), with this showing the building erected on piers. Though this is an interpretation of the building (as it is an illustration), it shows the form and style of the original building. The previous history of the school from its SHI form indicates that the original building was built on woodpiles (and not brick piers), which corroborates with the illustration that shows the building erected on posts. It is not known when this original building was demolished and removed, however by 1892 a new building was erected (this the surviving heritage building A). Today this area is occupied by the staff car park (Figure 47).

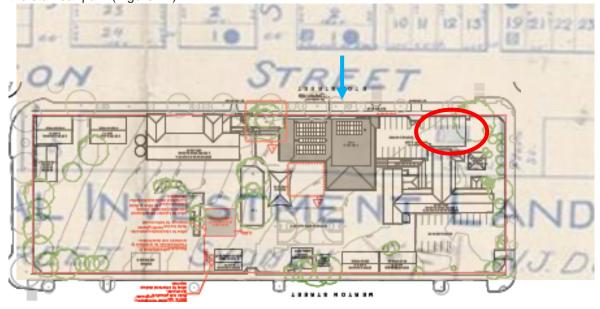


Figure 47: Overlay of 1887 Map over Drawing No. A-900 (Principle Priced Option 1 & 2 - COLA and Rainwater Tank Relocation). Location of original school building circled in red, with location for proposed hall indicated by blue arrow.

Any potential archaeological deposits buried in this area would be associated with the original use of the school. Potential deposits may include the post holes and fills, which provide evidence of where the



original building was erected, and any underfloor deposits of the building (eg. stationery). Due to the laying of the carpark which would have required the clearing of topsoils, it is likely that the underfloor deposits would not have survived, however the potential post holes and fills may still survive and be buried beneath the carpark. These post holes and fills would likely be of heritage significance as they provide evidence of the original school construction, prior to the establishment of the Sutherland township.

Based on the historical phases of development of the site, the area where the hall development is proposed is unlikely to impact potential archaeological deposits associated with the original school building.

5.4. Tree Removal

The proposal involves the removal of trees to accommodate the new hall development and associated services and infrastructure. As per the *Aboricultural Impact Assessment* prepared for the site Hugh The Arborist (January 2025), this includes the trees identified as T3 (Swamp Mahogany), T4 (Broad Leaved Paperbark), T5 (Illawarra Flame), T6 (Elmon Scented Tea Tree), T7 (Lemon Scented Tea Tree) and T8 (Queensland Brushbox). The location of these tree is visible in Figure 48.

As established at Section 4.4 of this report, T8 was identified as having significance for the contribution it makes to the heritage item 3618 'Sutherland Primary School, including original building and grounds'. The removal of this tree would therefore have an impact on the heritage significance of the school as it would be removing a mature tree which has been associated with the schoolgrounds. Efforts were made to retain the tree in place, however there were various constraints identified which means that the removal of this tree would need to occur.

Minor encroachment of building footprint and COLA into the Tree Protection Zone (TPZ):

The encroachment into the TPZ of T8 was inevitable as the new development requires a sufficient setback from both the heritage building (Building B), which currently is at 4 metres. A reduced setback would have an additional impact on the setting and appearance of the heritage building as the new hall development would appear bulkier and dominant. The proposed 4 metre setback from the heritage building is preferred from a heritage perspective than the retention of the tree, particularly as there are additional mature trees within the schoolgrounds which are being retained and which contribute to the landscaped setting of the heritage item.

The building and COLA's encroachment into the TPZ can also not be avoided as a safe setback from the boundary fence on the western side of the school is required to avoid a climbing hazard to students. Finally, the setback on the western side is required to provide sufficient space for the gas enclosure and incoming services.

New electrical, communications and security cables:

New cabling is required for the hall, with this to be installed between the hall and blocks A and B. The TPZ of Tree 8 occupies nearly the entire space between the three buildings, leaving no space for running services. Efforts to relocate the cabling further to the east closer to the basketball court would still overlap the TPZs of T8, T9 and T9B. Rerouting this to an alternative pathway would require services be extended all the way to the basketball court, which would require additional pits and cable lengths which would increase costs by approximately \$150,000 as well as unnecessary excavation across the grounds.

Stormwater:

Stormwater pipes and grates are required to run adjacent to the edge of the new hall development to collect the considerable overland flow from the playground. These pipes and gates encroach into the TPZ of Tree 8 and therefore would not operate safely and effectively.

Hydraulic services:

The existing water and sewer pipes that traverse through the TPZ of Tree 8 would require diversion to accommodate the new hall development. This will require trenching within the TPZ between the trunk of T8 and the new hall.

Existing electrical and communications:



There are existing communications and power cables that run between Block A and B (heritage buildings) through the TPZ of T8 that would need to be diverted. Because of this, further excavation and trenching would be required within the TPZ of T8, which would impact on the health of the tree. These power cables are required to be maintained connectivity of Buildings A and B during and after the construction of the hall.

After consideration of the required earthworks, diversion of existing services, and installation of new services, the encroachment into the TPZ of T8 would exceed 30%, which is not viable for the health and retention of the tree. Though this will have a discernible impact on the grounds and setting of the heritage item, the removal is considered necessary for the viability of the project. The removal is also a preferred option than the encroachment of the new hall physically and visually into the heritage buildings, which is the primary element of each item that requires conservation and protection of their setting.

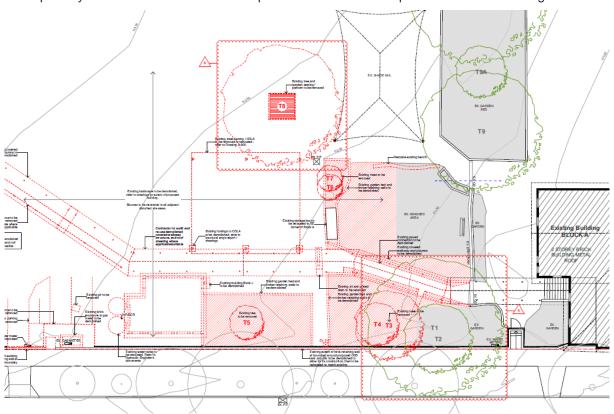


Figure 48: Demolition Plan, showing the removal of T8 (alongside other trees) to accommodate the new hall development.

5.5. Statutory Controls

The subject site is listed as two heritage items on Schedule 5 of the Sutherland Shire LEP 2015 as

- 'Former Sutherland Intermediate High School building (now part of Sutherland Primary School)', 38–54 Eton Street, item no.3614.
- 'Sutherland Primary School, including original building and grounds', Flora Street (corner of Eton and Merton Streets), item no.3618.

The subject site is also located within close proximity to a number of heritage items listed on the *LEP*. As such, development within Sutherland Public School would usually be subject to the heritage provisions and controls contained within the *Sutherland Shire LEP* 2015 and the *Sutherland Shire DCP* 2015. However, as the proposal is undergoing an internal REF pathway (under the *EP&A Act*), the *LEP* and *DCP* provisions included below instead act as a guide for completeness.





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

The following provisions contained within the *EP&A Act* are relevant to the subject proposal due to the site's heritage listing and thus have been considered below.

Subdivision 2 Duty of determining authorities to consider environmental impact of activities

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.
- The existing Sutherland Public School contains the two local heritage items listed under Part 1 of Schedule 5 of the Sutherland Shire LEP 2015. The proposal involves the construction of a new hall within the Sutherland Public School schoolgrounds. As this involves the erection of a building within a heritage item, the impact of the proposal on the heritage item is required, which is undertaken in this SOHI.

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

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

Subdivision 2 Duty of determining authorities to consider environmental impact of activities

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

- In determining environmental impact, the EP&A Regulation 2021 identifies that various criteria of heritage significance are relevant for consideration. These are highlighted above in regulation 171 (2) (e). These significance considerations are mostly taken from the Heritage Council of NSW's significance assessment criteria.
- The specific significance criteria that are relevant to the heritage significance of the heritage items 3618 and 3614 are its historical, architectural and aesthetic significance. This is because as per the Statements of Significance for both items (extracted at Section 4.2), the items are significant for being examples of historic architectural styles (Inter-War Free Classical and late Victorian / Federation style) in the Sutherland township that have a major streetscape contribution, having retained much of their original architectural character.
- It is considered that the aesthetic, architectural, and historical significance of the heritage items will not be adversely impacted by the proposed activity. This is due to the sympathetic design of the new hall structure so as to not physically or visually overwhelm





Subdivision 2 Duty of determining authorities to consider environmental impact of activities	
	these important heritage buildings. The historical and aesthetic significance of the heritage item will not be compromised with the proposed activity, thus there is no environmental impact from a heritage perspective.

5.5.3. Sutherland Shire Local Environment Plan 2015

Under section 5.10 of the Sutherland Shire LEP 2015, there are heritage conservation requirements for proposals that require consent from the Council. In this REF process however, these provisions are not a requirement as the proposal is not requiring consent from Sutherland Shire Council. Regardless of this, the relevant heritage conservation provisions under section 5.10 are provided below to illustrate the minor impact the proposal has on the site's heritage significance.

Clause 5.10 Heritage Conservation

(2) Requirement for consent.

Development consent is required for any of the following-

- (a) demolishing or moving any of the following or altering the exterior of any of the following (including, in the case of a building, making changes to its detail, fabric, finish or appearance)-
 - (i) a heritage item
 - (ii) an Aboriginal object
 - (iii) a building, work, relic or tree within a heritage conservation area
- (b) altering a heritage item that is a building by making structural changes to its interior or by making changes to anything inside the item that is specified in Schedule 5 in relation to the item.
- (c) ...
- (d) ...
- (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
 - (iii) ...

- The subject site is identified as the curtilage of two heritage items listed on the Sutherland Shire LEP 2015
 - Former Sutherland Intermediate High School building (now part of Sutherland Primary School), 38–54 Eton Street, item no.3614.
 - Sutherland Primary School, including original building and grounds, Flora Street (corner of Eton and Merton Streets), item no.3618.
- There are no works or alterations proposed to the heritage buildings themselves, with the proposed works instead involving the construction of a new hall building within the schoolgrounds of Sutherland Public School. The erection of this building amounts to erecting buildings on the grounds of a heritage item under 5.10 (2) (e).
- Regardless as to whether consent is required from Council, the proposal is undergoing a development permitted without consent pathway under the SEPP (Transport and Infrastructure) 2021.

(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

This Statement of Heritage Impact (SOHI) has considered the potential impacts of the proposed development on the heritage significance of the 'Former Sutherland Intermediate High School building (now part



Clause 5.10 Heritage Conservation

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).

- of Sutherland Primary School)' (item 3614) and 'Sutherland Primary School, including original building and grounds' (item 3618).
- This SOHI finds that the proposed works have a minor visual impact on the heritage item, with impacts mitigated through the design and placement of the new hall. This is outlined further in Section 5.2 of this report.

(5) Heritage assessment

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

- (f) on land which a heritage item is located, or
- (g) on land that is within a heritage conservation area, or
- (h) 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.

- A heritage management document is defined at the Dictionary for *Sutherland Shire LEP* 2015 as:
 - (a) a heritage conservation management plan,
 - (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 significance or heritage conservation area.
- This SOHI addresses this subclause as the development is located within the land that is identified as a heritage item. It is also located in proximity to heritage items (as identified at section 1.4 of this report).

(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)-

- (i) notify the Heritage Council of its intention to grant consent, and
- (j) take into consideration any response received from the Heritage Council within 28 days after notice is sent.
- The subject site is not listed as being an archaeological site under Part 3 of Schedule 5 of the Sutherland Shire LEP, therefore the subject clause does not apply.
- Based on historical research to date, there is potential for archaeology to be present in the north-western corner of the school where the first school building was erected (c.1887), however this area is away from where the proposed new school hall is to be constructed. As such, there is not likely to be any archaeological impacts for the proposed works associated with the new hall.
- Notwithstanding, should any unexpected archaeological finds be uncovered during any ground works, the 'STOP WORK' procedure will be applied to allow for the inspection of an appropriately qualified archaeologist in order to advise on the required management and consultation with Heritage NSW.

(8) Aboriginal places of heritage significance

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

Investigation into the potential Aboriginal heritage values of the subject site is beyond the scope of this report. A separate Preliminary Indigenous Heritage Assessment





Clause 5.10 Heritage Conservation

- (k) consider the effect of the proposed development on the known heritage significance of the place and any Aboriginal object known or reasonably likely to be located at the place by means of an adequate investigation and assessment (which may involve consideration of a heritage impact statement), and
- (I) notify the local Aboriginal communities, in writing or in such other manner as may be appropriate, about the application and take into consideration any response received within 28 days after the notice is sent.

and Impact Report was undertaken for the school by Kayandel (September 2024), with this informing the Aboriginal heritage significance of the site.

5.5.4. Sutherland Shire Development Control Plan 2015

Under the REF process, controls identified under a DCP are not enforceable for projects that proceed under an REF. Instead, the controls of the Sutherland DCP are considered below in the context that they act as a general guide that confirms the proposal has a minor heritage impact.

As identified in the *SRISI: Sutherland Public School* (CPH, November 2023), there are no general controls contained within the *Sutherland Shire DCP* 2015 that specifically addresses the development of heritage items or development in proximity to heritage items. Instead, the DCP is primarily organised to address specific land zoning controls (eg. R2 Low Density Residential, R2 Medium Density Residential) and types of development (eg. dwelling houses, multi-dwellings, dual occupancy). Within these Chapters on specific land zoning controls and development types are various environmental considerations, including heritage. There are, however, no specific controls related to land zoned as SP2 Educational Establishment.

Chapter 35 Other Uses addresses the development of sites that are not specifically addressed in the prior land zoning chapters. The controls which may be relevant to the subject proposal are considered below.

Chapter 35 Other Uses 1. All Other Uses: Streetscape, Building Form and Siting 1.1 Objectives This proposal relates to these matters as follows:

1. Ensure that all elements of development visible from the street, waterways and public domain make a positive contribution to the streetscape, foreshore and natural features of the area.

The proposed new hall will make a positive contribution to the streetscape of Eton Street as it will ensure the existing heritage buildings across the streetscape remain as dominant elements and sit as a simple building within the existing building typologies of Sutherland Public School. It has been appropriately articulated and designed to be sympathetic to the nearby heritage buildings visible along Eton Street, including that of the Block A building within the schoolgrounds (item 3614). It is also appropriately articulated to not detract or visually impact the views and settings of heritage items in the vicinity of the





Chapter 35 Other Uses 1. All Other Uses: Streetscape, Building Form and Siting	This proposal relates to these matters as follows:
	school, like that of the church (3619) to the north-east and the Port Jackson Fig (3617) to the south-west.
2. Ensure development is compatible with the scale, character and landscape setting of the streetscape.	The proposed new hall is appropriately scaled and does not physically overwhelm the heritage buildings on site (building A and Building B). This is seen in the height of the proposed hall, which is lower than the heights of both Building A and B on site. The lower height of the hall was made possible through the roof form proposed.
	The new hall has been sympathetically designed to not compromise the distinct character of Sutherland Public School, nor will it overwhelm the landscaped setting of the Eton Street streetscape. The Port Jackson Fig heritage item (3617) in proximity is also not compromised physically or visually by the proposed hall development.
3. Ensure that building siting, design and construction method responds to the natural landform of the site and is appropriate for the topography of the site.	The proposed new hall responds to the school's natural topography, which falls from north to south. Despite being at a taller height than Building A, the new hall will not be taller than the heritage item, owing in part to the roof option proposed. This is an appropriate design response that acknowledges the site's topography and landform.
4. Provide landscaping treatments which foster attractive outlooks, privacy and private recreation areas of high aesthetic quality.	The proposal does not introduce additional landscaping within the site, though significant landscapes will be retained. This includes the retention of the mature tree to the south-east of the hall within the school grounds, and the tree plantings outside the school along Eton Street.
5. Ensure development is sited and is designed so that the visual and acoustic privacy of neighbours and intended occupants is to acceptable levels.	Not applicable in terms of heritage.
6. Minimise direct overlooking of windows and private open space so that the amenity of neighbours and intended occupants is respected.	Not applicable as there are no windows proposed on the western elevation of the new hall building for acoustic reasons.
7. Ensure building design and location minimises adverse impacts of overshadowing on neighbouring buildings, private and public open spaces within the subject site and on adjoining sites.	The building is not at a height that it would exceed the height of either heritage items on site (Building A and Building B), thus there is not considered to be any significant overshadowing which will compromise the setting of these heritage items.
8. Provide adequate, safe and efficient parking, vehicular access and pedestrian access.	Not applicable in terms of heritage.



Statement of Heritage Impact Sutherland Public School 38-54 Eton Street, Sutherland NSW 2232

Project # H-23092 March 2025

Chapter 35 Other Uses

1. All Other Uses: Streetscape, Building Form and Siting

This proposal relates to these matters as follows:

1.2 Controls

- 1. Where development comprises a use that is not specified in Chapters 2 to 34 of this DCP, or where the proposed development is ancillary to the current use of a site, it must comply with the following controls of this DCP as they would apply to the principal building or development type located on that site, or otherwise permissible on that site:
- A. Streetscape and Building Form
- B. Building Setbacks
- C. Landform
- D. Landscaping
- E. Solar Access (for adjoining properties)
- F. Privacy (for adjoining properties)

. . .

Streetscape:

The amenity of the streetscape is not compromised with the proposed hall to be erected near the Eton Street boundary. It has been designed to sit comfortably within the existing built context of the school, with appropriate articulation on the street facing façade considering most of the new building will be obstructed by mature street plantings (See Section 5.2.1 above).

The design of the building also does not attempt to mimic or imitate some of the architectural features of the heritage buildings within the school. For example, distinctive architectural features of Building A like the rendered brick quoins on Building A are not replicated in the design, thereby allowing the original elements of this heritage item to continue to be appreciated. It also does not attempt to mimic the architectural detailing of the Church heritage item in proximity (item 3619).

The materiality used for the new hall reduces potential visual impacts on the setting of the nearby heritage items.

Building Setback:

The proposed new hall is sufficiently setback from the two heritage buildings within the site as much as the site conditions allow, thereby limiting its potential visual impact on these heritage items. The hall is setback 4 metres from Building B, and even further from Building A to allow for each heritage building to be viewed and appreciated without being physically overwhelmed by the new hall.

Landscaping:

The proposed activity will result in the removal of trees and landscaping within the schoolgrounds including a significant mature tree (tree 08). This tree was identified in the 2023 SRISI as significant for contributing to the setting of the heritage item on site (item 3618). This tree requires removal due to it being within the encroachment of the building footprint of the COLA. This cannot be avoided as there needs to be a sufficient setback (4 metres) from the heritage Building B, and setback from the western boundary fence to avoid a climbing hazard / provide sufficient space for the gas enclosure and incoming services. Rerouting services and implementing additional pits would increase costs by an estimated \$150,000.



5.5.5. State Environmental Planning Policy (Transport and Infrastructure) 2021

The following tables assesses the proposed upgrade of Sutherland Public School against the relevant clauses within the 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). Only the identified planning pathway requirements for this proposal are considered below.

Part 3.4 Schools - specific development controls

This proposal relates to these matters as follows:

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.

- The proposed works for the site qualify as development permitted without consent under section 3.37 of the SEPP (see below).
- The proposed works have an assessed minor heritage impact. This minor impact has been achieved through the mitigation of the design of the hall in consultation with the project heritage consultant (refer to sections 5.1 and 5.2 of this report for development of the design option and response to specific heritage concerns). The proposal will continue to maintain the characteristics and amenity of the school and not have an adverse effect on the appreciation and usage of the heritage items (Buildings A & B) on site.
- This SOHI which accompanies an internal REF is considered to be an assessment of the potential heritage impact for the purposes of 3.9 (2) (a).
- Sutherland Shire Council will need to be given written notice of the intention to undertake the proposed activity at the school. SINSW will need to take into consideration any response received from Council within 21 days of giving the written notice.

3.37 Schools—development permitted without consent

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
- Under this clause, the construction of a hall with associated outdoor learning area and kiosk is a development identified that does not require consent within an existing school grounds. Additional works like installing new covered walkways and infrastructure upgrades works



Part 3.4 Schools - specific development controls	This proposal relates to these matters as follows:
boundary with land in a residential zone and more than 1 metre from any property boundary with land in any other zone, of— (viii) a hall with an associated covered outdoor learning area or kiosk (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), (c) restoration, replacement or repair of damaged buildings or structures, (d) security measures, including fencing, lighting and security cameras, (e) demolition of structures or buildings (unless a State heritage item or local heritage item).	would also qualify as development which is permissible without consent. The proposed activity does not involve any demolition of structures or buildings that are heritage items; Building A and Building B will be retained as existing, as well as significant elements within the schoolgrounds like that of mature trees. As a result, the activity is considered to qualify as development permitted without consent and therefore Section 3.9 of the SEPP is applicable (see discussion above).

5.6. NSW Department of Planning and Environment Guidelines

The following questions to be answered have been extracted from the NSW Department of Planning and Environment's, *Guidelines for Preparing a Statement of Heritage Impact, 2023.* Responses have been provided in relation to the proposed development.

5.6.1. General considerations when preparing a statement of heritage impact

General considerations	This proposal relates to these matters as follows:
Section 1 - The Heritage Item	
1.1 Site description Is the location of the proposed works area clearly identified?	The location for the proposed hall within Sutherland Public School is clearly identifiable.
Section 2 - Significance Assessment	
2.1 Statement of significance Is the significance of the heritage item well documented and understood?	■ The significance of the two heritage items within the schoolgrounds are both well known. A combined assessment of the Heritage Council's





General considerations	This proposal relates to these matters as follows:
Have all the criteria of the heritage item's significance been considered?	significance criteria has been provided at Section 4.3 of this report.
Section 3 - Proposed Works	
 3.1 The proposal Is there enough information available about the proposed works to determine how they may impact the heritage item and its significance? 	There is enough information known about the proposed works for an assessment of its potential heritage impact to be made.
 3.2 Background Will the proposed works be the best conservation solution for the heritage item? Will the works promote the ongoing use and upkeep of the item? 	The proposed works will not compromise the use or appreciation of the heritage items within the site, with the new hall considered a positive benefit that improves the school's operation and cater to the contemporary needs of the students' education and activities.
Section 4 - Heritage Impact Assessment	
 4.1 Matters for consideration Do the proposed works include removal of unsympathetic alterations and additions? How does this benefit or impact the heritage item and its significance? 	■ The proposal does not include the removal of any identified additions to the school that are considered intrusive or detrimental to the school's heritage significance. The existing canteen building to be removed to accommodate the new hall is not considered intrusive, instead a neutral contemporary building within the schoolgrounds that does not detract or add to the site's heritage significance.
Do the proposed woks affect the setting of the heritage item, including views and vistas to and from the heritage item and/or a cultural landscape in which it is sited? Can the impacts be avoided and/or mitigated?	 The proposed works will not compromise any significant views of the heritage items within the site, with the two heritage buildings (A and B) still clearly visible from the streetscape (Eton, Flora and Merton Streets). The setting of heritage items will be impacted by the hall development as it will introduce a new structure between the two historic buildings. However, the design of this hall building has been specifically articulated so as to minimise this impact on the setting, for example through the roof pitch and roof design of the new hall, which will be multi-skillion and pitched to reduce its dominance and height. The proposed material of the hall's street façade, featuring metal cladding with a strong vertical profile and groove lines, provides a sufficient and defined architectural presence for a new hall that would have a different architectural style and language than a regular school building. This different style does not mimic the setting or appearances of the two heritage buildings within the school, another means in which the impact to the setting is minimised. Internal views of the two heritage items will be impacted as the new hall structure is to be placed





General considerations	This proposal relates to these matters as follows:
	between the two buildings, however the views between the two heritage buildings are mostly obstructed by existing tree plantings, covered walkways and the Cola (see Figure 49). There is no direct and clear relationship between the two buildings currently, and so it is not considered a significant view that will be lost with the erection of the new hall between them.
 Are the proposed works part of a broader scope of works? Does this proposal relate to any previous or future works? If so, what cumulative impact (positive and/or adverse) will these works have on the heritage significance of the item? 	■ The upgrade of Sutherland Public School is part of broader education infrastructure improvements being undertaken across other schools across the state as part of the Election Commitment upgrade program. No other additional works are known to be undertaken for Sutherland Public School.
 Are the proposed works to a heritage item that is also significance for its Aboriginal cultural heritage values? If so, have experts in Aboriginal cultural heritage been consulted? Has the applicant checked if any other approvals or a separate process to evaluate the potential for impacts is required? 	 N/A - A separate Preliminary Indigenous Heritage Assessment and Impact Report undertaken for the school by Kayandel (September 2024) did not identify the site to have potential Aboriginal cultural heritage values.
Do the proposed works trigger a change of use classification under the National construction code that may result in prescriptive building requirements? If so, have options that avoid impact on the heritage values been investigated?	N/A - continued usage of the site as a school.
If the proposed works are to a local heritage item, are the requirements of the development control plans or any local design guidelines that may apply to the site considered?	■ The controls of the Sutherland Shire DCP 2015 have been considered, with an assessment of the proposal made against those considered relevant from a heritage perspective. As noted, there is no general heritage controls section within the Sutherland Shire DCP 2015, instead controls relating to heritage being organised according to land zoning. Though there were no controls in the DCP for SP2 Educational Establishment, Chapter 35 Other Uses was used for this assessment as it provided controls concerning streetscape, building form and siting.
Will the proposed works result in adverse heritage impact? If so, how will this be avoided, minimised or mitigated?	■ The proposed works will not result in an adverse heritage impact to the two heritage items within Sutherland Public School. This is due to the design of the new hall, which mitigates potential visual impacts on the nearby heritage buildings (Building A and Building B) and their respective setting. There are no significant views between the buildings (see Figure 49) and so the erection of the hall will also not compromise significant views between the buildings, nor will it obstruct



General considerations	This proposal relates to these matters as follows:
	significant views of each heritage building from the streetscape.

Figure 49: View from ground floor of Building A looking towards Building B (background), which is obstructed by trees, covered walkways and the Cola.

5.6.2. Considerations for specific types of work

Alterations and Additions

The following table addresses the proposal in relation to relevant 'questions to be answered' relating to alterations and additions.

Questions to be answered	This proposal relates to these matters as follows:
■ Do the proposed works comply with Article 22 of The Burra Charter, specifically Practice note article 22 - new work (Australia ICOMOS 2013b)?	■ The proposed works comply with Article 22 of The Burra Charter as they do not distort or obstruct the heritage significance of the two heritage items on site. The new hall will be readily identifiable as a new structure from the two significant buildings; however the design is considered sympathetic by drawing upon similar materiality to sit well within the schoolgrounds.
Are the proposed alterations/additions sympathetic to the heritage item? In what way (e.g. form, proportion, scale, design, materials)?	■ The proposed new hall is considered sympathetic as it implements a design that reduces potential heritage impact on Building A and B. This can be seen in the height of the hall (less than both heritage items), the materiality used (brick base and metal cladding) and the design of the building (appropriate articulation of associated structures without mimicking the original elements of the heritage items).





Questions to be answered	This proposal relates to these matters as follows:
Will the proposed works impact on significant fabric, design or layout, significant garden setting, landscape and trees or on the heritage item's setting or any significant views?	■ The proposed new hall is considered sympathetic as it is sited in an appropriate location that does not detrimentally affect the setting or appreciation of the heritage items. Both heritage items can be seen streetscape, as well as internally within the schoolgrounds from other school buildings.
How have the impact of the alterations/additions on the heritage item been minimised?	■ The impact on the heritage significance of the site has been reduced by the siting of the hall in an area which is sufficiently setback from both Building A and B so as to not physically or visually overwhelm these buildings. Further, the impact on the heritage buildings has also been reduced through the sympathetic design, form, scale and materiality of the new hall.
• Are the additions sited on any known or potentially significant archaeological relics? If yes, has specialist advice from archaeologists been sought? How will the impact be avoided or mitigated?	 No, they are not within an area of potential archaeological deposits. The current staff car park is considered an area that has potential for locally significance archaeological deposits, however no excavation works is proposed in this area. Notwithstanding, should any unexpected archaeological finds be uncovered during any ground works, the 'STOP WORK' procedure will be applied to allow for the inspection of an appropriately qualified archaeologist in order to advise on the required management and consultation with Heritage NSW.

Tree Removal

The following table addresses the proposal in relation to relevant 'questions to be answered' relating to tree removal or replacement.

Questions to be answered	This proposal relates to these matters as follows:
Does the tree proposed to be removed contribute to the heritage significance of the heritage item?	One of the trees requiring removal (T8) is considered to have heritage significance. This is because it is a mature tree which has survived on site for at least 80 years (based on aerial imagery) it contributes to the landscaped grounds of the heritage item (3618).
Why is the tree being removed?	■ The trees are required to be removed to site the new hall within the schoolgrounds in a manner that is sympathetic to the heritage values of the heritage buildings. The TPZ of the trees being removed are also within the footprint of the new hall and associated covered walkways, meaning that long-term viability of the tree is endangered if retained (as per advice of the arborist).
Has the advice of a qualified arborist, tree surgeon or horticultural specialist been sought and implemented?	 An arborist has been engaged and provided advice on the trees - Hugh The Arborist, Aboricultural Impact Assessment, January 2025.
Is the methodology for tree removal adequately understood? Will the	 Methodology for tree removal is informed in the arborist report for the school.





Questions to be answered	This proposal relates to these matters as follows:
proposed works impact on the significance of the heritage item?	
Is the tree being replaced? Where will it be replaced and with what species? Why?	The proposed trees to be removed are not being replaced.

Access

The following table addresses the proposal in relation to relevant 'questions to be answered' relating to access.

Questions to be answered	This proposal relates to these matters as follows:
Will the heritage item be accessed by the public? If so, has the advice of an access consultant been sought to investigate options of Disability Discrimination Act compliant access that may have least impact on the heritage item?	 A BCA Consultant has informed access requirements for the new hall as it will be a publicly accessible space for the local community. This includes the provision of a ramp on the new hall's southern elevation and connected to the existing covered walkway which is near the north elevation of the heritage building A. The location of this ramp is not considered intrusive or impactful on the setting or appearance of the heritage building as there is sufficient distance between the two. No modifications are proposed to either heritage buildings (B and A) to facilitate access.

5.6.3. Matters for Consideration

The subheadings below should be used to accurately assess the impacts of the proposed works on heritage significance of the heritage items or the heritage conservation areas. Describe what measures the proposed works implement to avoid, minimise or mitigate any adverse impacts on the heritage significance of the item.

Fabric and Spatial Arrangements

As part of the upgrade to services within Sutherland Public School to accommodate the new hall, alterations to the existing services are required. This includes installing new communications and security cables into the communication racks in both Buildings A and B. The exact nature of new conduits or penetrations is not known at this stage as they will be determined by the head contractor during the detailed design, however the following recommendations are required to ensure they do not compromise the significant fabric and spatial arrangements of the heritage items on site (Buildings A and B).

- Existing cable runs should be utilised where possible
- New cable runs should not be chased into original walls. Options for cables to run through floor and roof spaces should be investigated
- New fixtures should be affixed into mortar joints to prevent impacts to significant fabric

Regardless, it is recommended that a heritage consultant reviews any identified penetrations to ensure that the significant heritage fabric of the building is retained.

Settings, views and vistas

The setting of the two heritage items within the schoolgrounds will not be compromised, with the significant views of both Buildings A and B from the streetscape retained. Though the new hall is to be placed between the two heritage buildings, the hall is sufficiently distanced away from both buildings so that it will not physically nor visually overwhelm these significant buildings. This hall has also been appropriately designed and articulated to limit its bulkiness, for example through an appropriate roof



pitch and height. There are also no significant internal views currently afforded between Buildings A and B due to obstruction by the existing Cola / trees / covered walkways, and so the erection of the hall will not compromise any existing significant views and vistas. The existing internal views form the heritage buildings to the significant trees and contributory classrooms (like Buildings D and E) are not impacted by the proposal.

Landscape

The proposal involves the removal of some trees within the schoolgrounds, including the significant T8 tree. This is outlined in Section 5.4 of this SOHI. A number of reasons necessitated the removal of the tree, and though it has an impact on the setting and landscaped grounds of the heritage item, the removal ensures the new hall development is sited in a manner that it will not physically or visually overwhelm the significant buildings within the school (Buildings A and B).

Use

The proposed use of the new building as a hall will not impact the heritage significance of the site.

Demolition

No demolition of heritage buildings is proposed. The demolition of the canteen structure within the grounds to accommodate the new hall with kiosk is considered minor impact as the canteen building does not have any identified heritage significance, being a late 20th Century addition to the site.

Curtilage

The curtilage of the two heritage items on site will not be impacted by the proposal. The curtilage is identified as the schoolgrounds of Sutherland Public School, which is not proposed to be altered.

Moveable heritage

Not applicable - there is no movable heritage at the subject site.

Aboriginal cultural heritage

Not applicable - there are no identified Aboriginal cultural heritage values associated with the subject site (as per the *Preliminary Indigenous Heritage Assessment and Impact Report* prepared by Kayandel).

Historical archaeology

There is no identified historical archaeology that will be impacted in the proposal. Areas of potential historical archaeology are located within the area of the staff carpark, which is away from the area where the proposed new hall is to be constructed. Refer to discussion at Section 5.3 for further information.

Natural heritage

There are some mature trees within the schoolgrounds that have identified natural heritage for the contribution they make to the setting and amenity of the original school building (B00B). Some of these mature trees require removal, as identified at Section 5.4 of this SOHI.

Conservation areas

Not applicable - the subject site is not situated within a heritage conservation area.

Cumulative impacts

There are no adverse cumulative impacts on the heritage items within the site.

The conservation management plan

Not applicable - there is no CMP for the site.

Other heritage items in the vicinity

There is no impact to heritage items in the distant vicinity of the subject site. This is because there are no established sightlines or significant views between the area proposed for the construction of the new hall and the heritage items in the vicinity.

Commonwealth / National heritage significance





Not applicable - the subject site has no identified national heritage significance.

World heritage significance

Not applicable - the subject site has no identified world heritage significance.

5.7. Mitigation Measures

As a result of the above assessment of the potential heritage impact of the proposed activity, the following mitigation measures are recommended to ensure the heritage significance of the site is respected and no harm to the significant fabric or unexpected finds occur during the construction works.

Mitigation Name	Aspect	Mitigation Measure	Reason for Mitigation Measure
Built Heritage Specialist to be Commissioned	During detailed design stage	Alterations to the school's services network affecting Building B00A and B00B should be designed to minimise impact to original / significant heritage fabric in accordance with the design advice provided in the project's SOHI (see Section 5.6.3 - Fabric and Spatial Arrangements above). Finalised designs should be reviewed by a suitably qualified and experienced built heritage specialist (architect) prior to implementation to confirm proposed impacts have been minimised as far as practicable. The built heritage specialist can also provide additional and tailored heritage design advice during the detailed design stage once the required services upgrades are known.	Prevent damage to heritage fabric and to ensure ongoing heritage guidance to the project.
Unexpected Finds procedure	During trenching works	The Heritage Act 1977 protects non-Aboriginal heritage items which are defined as "any deposit, artefact, object or material evidence that relates to the settlement of the area that comprises NSW, not being Aboriginal settlement; and is of State or local heritage significance". Should any unexpected finds be uncovered during trenching works, the 'unexpected finds protocol' should be implemented and works stopped immediately. Allow for the inspection of the relic by appropriately qualified archaeologist in order to advise on the required management and consultation with Heritage NSW.	Prevent damage to archaeological relics



6. CONCLUSION AND MITIGATION MEASURES

In conclusion, it is considered by City Plan Heritage that the proposed works, including the construction of a new hall and associated covered walkways, relocation of the Cola and alterations to existing boundary fences, will have minor impact the heritage significance of the two heritage items on the school grounds. This is because the design of the new hall development and its placement within the school have been carefully considered to be respectful and sympathetic to the two heritage items (Buildings A and B) in line with its functional nature as a hall building. This is seen in the roof form proposed, which though not gabled like other buildings within the school, employs mono-pitched roofs across associated structures in order to reduce the scale of the new hall building and therefore its visual impact on the surrounding heritage buildings. The visual impact has also been minimised by installing required solar panels flat onto the roofs and not through bulkier tilted frames. Appropriate setbacks from both heritage school buildings allow sufficient buffer and setting, while the materiality proposed for the hall reflects its surrounding heritage context (facebrick and metal cladding). The articulation through various heights, materials and multi-skillion roof forms is appropriate given the fact that the building's western elevation is obscured by street plantings and maintain the simplicity of a hall building. The proposed setback as noted above is respectful to the heritage items as they can be seen and appreciated in full. This required setback from the heritage buildings and other constraints around services means that a significant tree within the schoolgrounds will require removal (Tree 8). This will therefore impact the setting of the heritage listed grounds (of item 3618), however a number of other mature trees within the school will be retained to ensure the landscaped character of the school is not lost.

Mitigation Measures:

The alterations to the school's services network should not compromise the fabric and spatial arrangements of the heritage buildings on site. The exact nature of new conduits or penetrations is not known at this stage as they will be determined by the head contractor during the detailed design stage, however the following recommendations are required to ensure they do not compromise the significant fabric and spatial arrangements of the heritage items on site (Buildings A and B).

- Existing cable runs should be utilised where possible
- New cable runs should not be chased into original walls. Options for cables to run through floor and roof spaces should be investigated
- New fixtures should be affixed into mortar joints to prevent impacts to significant fabric

Finalised designs should be reviewed by a suitably qualified and experienced built heritage specialist (architect) prior to implementation to confirm proposed impacts have been minimised as far as practicable.

Should any unexpected finds be uncovered during trenching works, the 'unexpected finds protocol' should be implemented and works stopped immediately. Allow for the inspection of the relic by appropriately qualified archaeologist in order to advise on the required management and consultation with Heritage NSW.

The proposal demonstrates compliance with the existing controls regarding heritage conservation.

CITY PLAN HERITAGE MARCH 2025