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Concord High School

Statement of Heritage Impact

Prepared for School Infrastructure NSW

June 2023 – Final Update

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Sydney
Melbourne
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EXTENT HERITAGE PTY LTD
ABN 24 608 666 306
ACN 608 666 306
info@extent.com.au
extent.com.au

SYDNEY
Level 3/73 Union St
Pyrmont NSW 2009
P 02 9555 4000
F 02 9555 7005

MELBOURNE
Level 1, 52 Holmes St
Brunswick East VIC 3057
P 03 9388 0622

BRISBANE
Level 12/344 Queen St
Brisbane QLD 4000
P 07 3051 0171

PERTH
Level 25/108 St Georges Tce
Perth WA 6000
P 08 9381 5206

HOBART
54A Main Road
Moonah TAS 7009
P 03 6134 8124

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Author(s):	Kim Watson Francesca McMaster Reuel Balmadres Hayley Edmonds

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Executive summary

Extent Heritage Pty Ltd (Extent Heritage) has been commissioned by School Infrastructure NSW (SINSW) to provide a Statement of Heritage Impact (SOHI) for the redevelopment of Concord High School (hereafter the 'site') to cater to the increased student capacity and improve amenity. The purpose of this report is to analyse the potential heritage impacts of the project on the known heritage significance of Concord High School.

Concord High School is listed as a local landscape heritage item on Schedule 5 of the *Canada Bay Local Environmental Plan 2013*. The heritage item is identified as 'Concord High School – grounds' (Item No. 421) within this schedule. It contains cultural plantings dated to the late 1930s associated with the former Farleigh Nettheim Tannery, a collection of indigenous trees, and a consciously designed entry landscape from c.1978 associated with the inception of Concord High School. The former heritage assessment recorded on the State Heritage Inventory database assessed the item as having aesthetic and representative significance at the local level.

This report is to accompany a Development Application to Canada Bay Council. It assesses the 100% Schematic Design and associated impacts to significant fabric and features at the school. This report specifically relates to built heritage and historical archaeology and includes recommendations and conclusions drawn from the impact assessment.

This Statement of Heritage Impact has considered the potential heritage impacts of the 100% Schematic Design on the heritage significance of Concord High School. It is considered that the new buildings and landscaping proposed in the 100% Schematic Design constitute works that complement and respect the existing character and qualities of the school. The new buildings utilise architectural forms and language inspired by the existing context, and the new landscaping will provide a continuation of the existing historic landscaping that exists throughout the school buildings.

The 100% Schematic Design is therefore considered acceptable in regard to considerations of heritage significance.

Recommendations

Based on the Statement of Heritage Impact, it is proposed that future planning for the site is guided by the following recommendations.

Built Heritage

- This SOHI is to accompany a Development Application to Canada Bay Council.
- If the scope of works is changed to involve any additional impacts to any significant features or fabric not explicitly outlined in this report, further heritage assessment will be required.
- The landscaped character of Concord High School must be retained and respected. The works should be carried out in accordance with the recommendations of a suitably qualified arborist.

- Prior to works commencing, contractors must be briefed on the heritage sensitive nature of the site and informed of any recommended mitigation measures or controls required.

- The construction methodology should be reviewed and endorsed by the Project Arborist prior to undertaking the works to ensure there is no impact to significant trees within the vicinity of the proposed works.

- Building and construction materials should not be stockpiled against any buildings on site and should be located at a suitable distance away from significant landscape elements (trees and garden beds). Laydown areas and high-traffic areas should have a clear separation from heritage elements (built and landscape) on the site. The graded elements of significance in Section 6.2 should be used to guide the location of suitable laydown areas.

- Any accidental damage to heritage items is to be treated as an incident, with appropriate recording and notification.

- All areas affected by works must be cleaned and made good by contractors after they have completed their works. This may include replanting of low-lying vegetation or mature trees impacted by the construction works. Replanting with a like for like option is appropriate.

Historical Archaeology

Given that the site has low-to-moderate potential for locally significant archaeological remains, it is recommended that the following mitigation of potential development impacts be carried out:

- Following confirmation of 100% Schematic Design, as part of the risk management for the project, it is recommended that a program of test excavation be undertaken at the earliest opportunity to determine the extent, nature, and level of preservation of archaeological relics that may survive at the site. This would inform decisions on how to manage the archaeological resources in the remaining portions of the site.

- As the potential archaeological resource has been assessed to be of local significance; it is recommended that a program of archaeological testing be undertaken under an S139(4) exception 2, in accordance with the guidelines Relics of local heritage significance: a guide for archaeological test excavation (Heritage NSW, 2022). As per the guide, Step 1 has been completed through the preparation of this report. Steps 2 and 3, regarding the preparation of a test excavation research design and methodology would need to take place prior to onsite works commencing. We recommend this takes the form of an Archaeological Research Design (ARD) report. The ARD would determine the placement of test trenches based on the proposed impact areas and the potential archaeological resource. It is likely that these areas would be the parts of the school grounds that fall within the tannery footprint, outside of existing school buildings and within the proposed impact areas. This will ensure that the presence or absence of archaeological remains within the footprint of the proposed development is evaluated.

- Following the completion of the archaeological test excavation, a report summarising the results would be prepared. It would provide recommendations for archaeological management throughout the subsequent project phases. These might include modifications

to development design as an avoidance strategy, further recommendations for salvage after thorough recording, or protection of remains prior to their being built on. As per the guide for S139(4) exception 2, the post-excavation report and all excavation records would need to be held by the proponent for a reasonable amount of time.

- Depending on the testing results, it may be necessary to undertake a reassessment of potential archaeological significance, including an update of this report.

- Further archaeological management of the site's resources would be determined on the basis of the results of the program of archaeological testing

Contents

List of abbreviations

Abbreviation	Meaning
DA	Development application
DP&E	Department of Planning and Environment
EP&A Act	*Environmental Planning and Assessment Act 1979*
Growth Centres SEPP	State Environmental Planning Policy (Sydney Region Growth Centres) 2006
HCA	Heritage Conservation Area
Heritage Act	*Heritage Act 1977* (NSW)
SEPP Transport and Infrastructure	State Environmental Planning Policy (Transport and Infrastructure) 2021
LEP	Local Environmental Plan
NSW	New South Wales
S170 Register	Section 170 State Agency Heritage and Conservation Register
SHI	State Heritage Inventory, NSW
SHR	State Heritage Register
SoHI	Statement of Heritage Impact

1. Introduction

1.1 Project description

Extent Heritage Pty Ltd (Extent Heritage) has been commissioned by School Infrastructure NSW (SINSW) to provide a Statement of Heritage Impact (SOHI) for the redevelopment of Concord High School (hereafter the 'site') to cater to the increased student capacity and required upgraded amenity. The purpose of this report is to analyse the potential heritage impacts of the project on the known heritage significance of Concord High School. Concord High School is listed as a local landscape heritage item on Schedule 5 of the *Canada Bay Local Environmental Plan 2013*. The heritage item is identified as 'Concord High School – grounds' (Item No. 421) within this schedule. It contains cultural plantings dated to the late 1930s associated with the former Farleigh Nettheim tannery, a collection of indigenous trees, and a consciously designed entry landscape from c.1978 associated with the inception of Concord High School. The former heritage assessment recorded on the State Heritage Inventory database assessed the item as having aesthetic and representative significance at the local level.

This report will form a part of the Development Application (DA) and assess the 100% Schematic Design for the school. It will identify potential risks and identify safeguards to avoid or minimise impacts to significant fabric and features, recommendations for heritage enhancement opportunities are also provided. This report specifically relates to built heritage and historical archaeology and includes recommendations and conclusions drawn from the impact assessment.

1.2 Approach and methodology

The methodology used in the preparation of this Statement of Heritage Impact (SOHI) is in accordance with the principles and definitions set out in the guidelines to *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance* (the *Burra Charter*) (Australia ICOMOS 2013) and the latest version of the *Statement of Heritage Impact Guidelines* (Heritage Office and Department of Urban Affairs and Planning 2002), produced by the former NSW Office of Environment and Heritage (now the Department of Planning and Environment).

This SOHI will review the relevant statutory heritage controls, assess the impact of the proposal on the subject property and make recommendations as to the level of impact.

1.3 Limitations

The site was inspected and photographed by Hayley Edmonds and Francesca McMaster (heritage advisors) on 5 July 2022. The inspection was undertaken as a visual study only.

The historical overview provides sufficient historical background to enable an understanding of the place in order to assess the significance and provide relevant recommendations, however, it is not intended as an exhaustive history of the site.

This assessment does not include an assessment of Aboriginal heritage.

1.4 Authorship

The following staff members at Extent Heritage have prepared this Statement of Heritage Impact:

- Kim Watson, senior heritage advisor;
- Francesca McMaster, heritage advisor; and
- Reuel Balmadres, research assistant.

This report was reviewed by Eleanor Banaag, senior associate, and Dr. Madeline Shanahan, director.

Hayley Edmonds, heritage advisor, undertook updates to the report for the 100% Schematic Design stage in May 2023.

1.5 Ownership

The site is owned and managed by Department of Education.

1.6 Terminology

The terminology in this report follows definitions presented in the *Burra Charter* (Australia ICOMOS 2013). Article 1 provides the following definitions:

> ***Place*** means a geographically defined area. It may include elements, objects, spaces and views. Place may have tangible and intangible dimensions.
>
> ***Cultural significance*** means aesthetic, historic, scientific, social or spiritual value for past, present or future generations. Cultural significance is embodied in the *place* itself, its *fabric*, *setting*, *use*, *associations*, *meanings*, records, *related places* and *related objects*. Places may have a range of values for different individuals or groups.
>
> ***Fabric*** means all the physical material of the *place* including elements, fixtures, contents and objects.
>
> ***Conservation*** means all the processes of looking after a *place* so as to retain its *cultural significance*.
>
> ***Maintenance*** means the continuous protective care of a *place*, and its *setting*. Maintenance is to be distinguished from repair which involves *restoration* or *reconstruction*.
>
> ***Preservation*** means maintaining a *place* in its existing state and retarding deterioration.
>
> ***Restoration*** means returning a *place* to a known earlier state by removing accretions or by reassembling existing elements without the introduction of new material.

Reconstruction means returning a *place* to a known earlier state and is distinguished from *restoration* by the introduction of new material.

Adaptation means changing a *place* to suit the existing *use* or a proposed use.

Use means the functions of a *place*, including the activities and traditional and customary practices that may occur at the place or are dependent on the place.

Compatible use means a *use* which respects the *cultural significance* of a *place*. Such a use involves no, or minimal, impact on cultural significance.

Setting means the immediate and extended environment of a *place* that is part of or contributes to its *cultural significance* and distinctive character.

Related place means a *place* that contributes to the *cultural significance* of another place.

Related object means an object that contributes to the cultural significance of a place but is not at the place.

Associations mean the connections that exist between people and a place.

Meanings denote what a place signifies, indicates, evokes or expresses to people.

Interpretation means all the ways of presenting the cultural significance of a place.

2. Site identification

Concord High School is located in the western suburbs of Sydney, in the suburb of Concord within the Canada Bay Local Government Area (LGA). The study area has a primary street address of 5 Stanley Street, Concord and occupies land legally defined as Lots 1 to 3 in DP1114919, Lots 15, 18, 19 and 20 in DP8687, and Lot 1 in DP60167. The location of the site is shown in Figure 1 and Figure 2 below.

The site is an operational secondary (high) school that comprises a collection of late 1970s education institutional buildings with demountable buildings, sport fields, courtyards and shaded grounds. The surrounding area is characterised by low-density residential development neighbouring a recreational sporting facility with St Luke's Oval and park providing large tracts of green space to east and south of the study area.

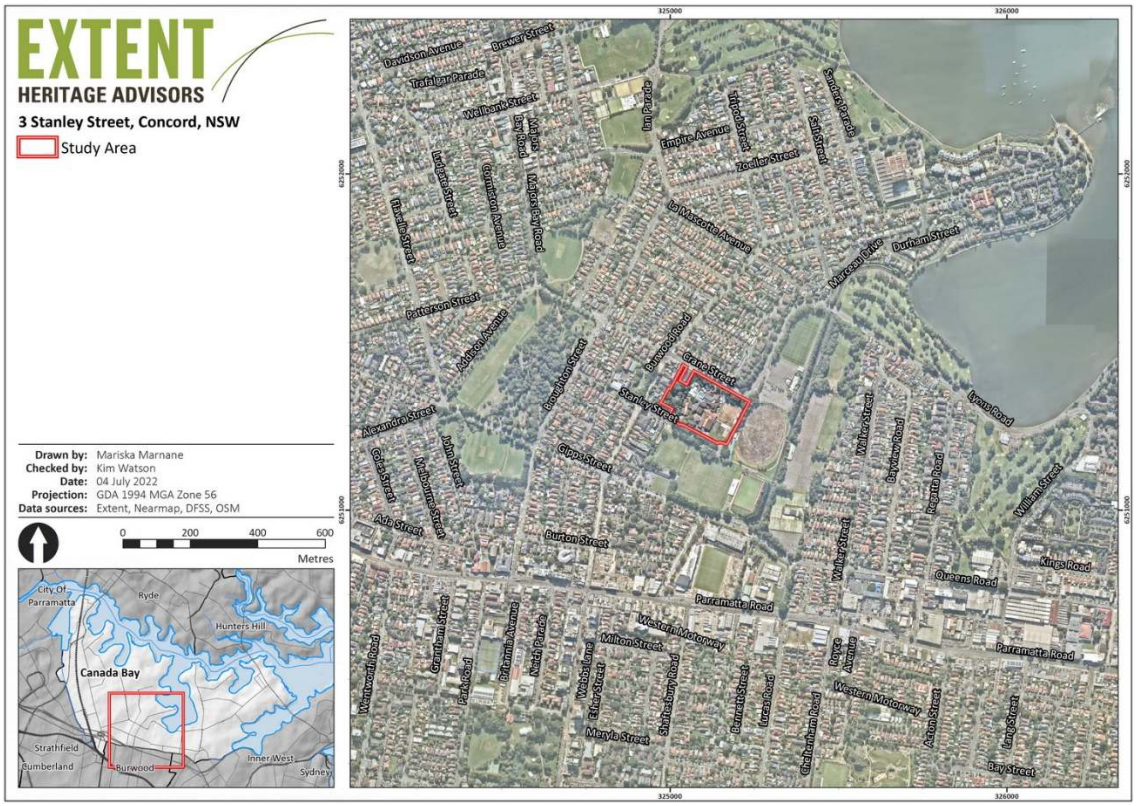

Figure 1. Overview of study area.

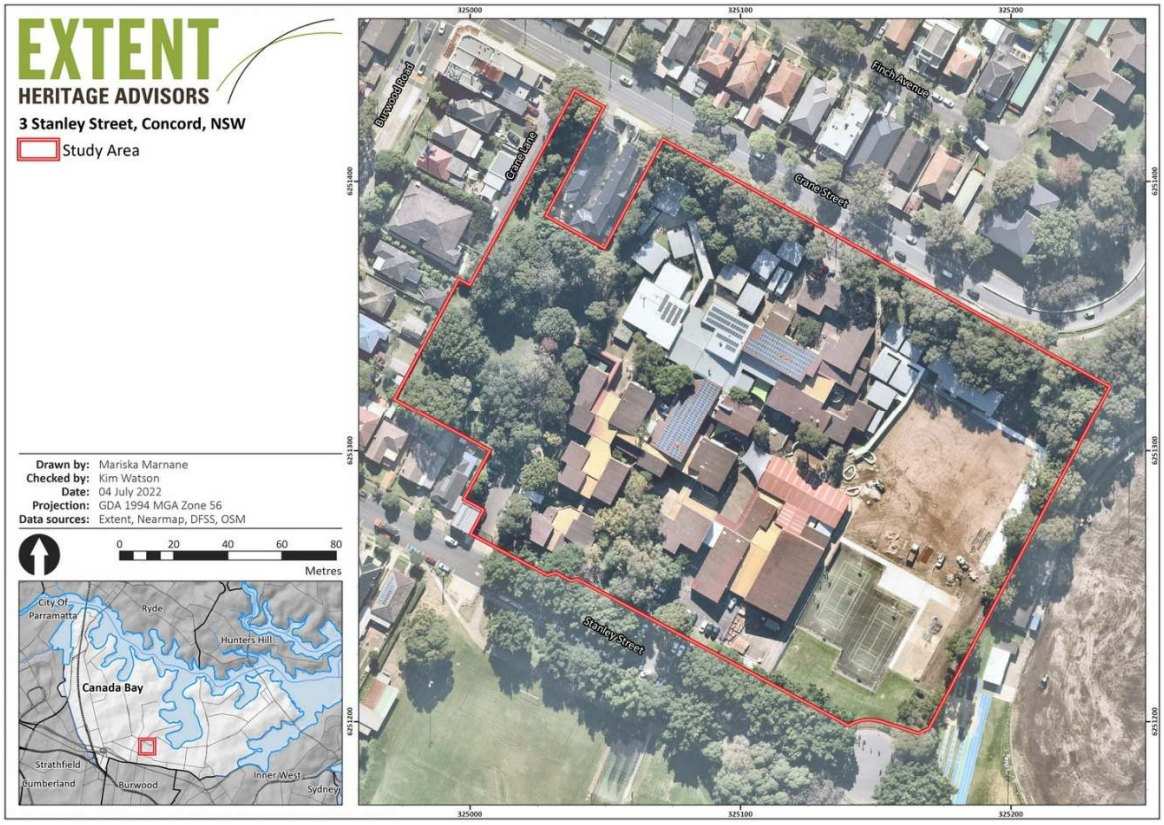

Figure 2. Detail of study area.

3. Heritage planning context

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

- *Environment Protection and Biodiversity Conservation Act 1999*
- *Heritage Act 1977 (NSW)*
- *Environmental Planning and Assessment Act 1979*
    - *Canada Bay Local Environmental Plan 2013*

3.1 Statutory heritage listings

3.1.1 Environment Protection and Biodiversity Conservation Act 1999

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

3.1.2 The Heritage Act 1977 (NSW)

State Heritage Register

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

State Agency Heritage and Conservation Register (s170)

The site **is** included on the Department of Education State Agency Heritage and Conservation Register as 'Concord High School grounds' (5064185).

3.1.3 Canada Bay Local Environmental Plan 2013

The site **is** listed as a local heritage item on Schedule 5 of the Canada Bay LEP 2013 as 'Concord High School grounds' (I421).

3.2 Non-statutory listings

3.2.1 National Trust of Australia (NSW) Register

The National Trust of Australia is a private, not-for-profit organisation that operates as an advocate and educator, with a mission to conserve Australia's heritage. The National Trust of Australia maintains a register of landscapes, townscapes, buildings, industrial sites, cemeteries, and other items or places that the Trust determines have cultural significance and are worthy of conservation.

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

3.2.2 Summary of heritage listings

Register/listing	Item listed	Item names	Item no.
Statutory registers			
National Heritage List	No	-	-
Commonwealth Heritage List	No	-	-
Heritage Act 1977 (NSW)	No	-	-
Department of Education State Agency Heritage and Conservation Register	Yes	Concord High School grounds	5064185
Parramatta Local Environmental Plan 2011	Yes	Concord High School grounds	I421
Non-statutory registers			
Register of the National Trust (NSW)	No	-	-

3.3 Heritage in the vicinity

The following heritage items are located in the vicinity of the site. They are listed on Schedule 5 of the Canada Bay LEP.

Table 1. Summary of heritage items in the vicinity of Concord High School.

Name	Address	Significance	Item no.
Street Trees	Stanley Street, Concord (south side)	Local	I422
Concord Primary School and grounds	66 Burwood Road, Concord	Local	I49
Street Trees	Burwood Road, Concord	Local	I56

Figure 3. Heritage items in the vicinity of the study area outlined in yellow. *Source:* Planning Portal.

4. Historical context

4.1 Historical development of study area post colonisation

The study area is located on Darug Country and it strongly associated with the Wangal group. The following history begins in period following British colonisation, but we acknowledge the many millennia of Aboriginal history from Deep Time, to the present day.

4.1.1 Early land grants

The study area is located on land originally granted to John Walker by Crown Grant in June 1848. Prior to this, 'Concord', as the locality was named, was surveyed by William Dawes in 1791 (Karskens 1986, 10). By 1793, a stockade was established as an overnight resting place for convict working parties strategically located halfway between Sydney and Parramatta making the journey by foot (Karskens 1986, 10). The stockade was located close to the present Concord Oval off Parramatta Road, approximately 300 metres south-east of the study area.

From 1819, the area later became known 'Longbottom Farm' or 'Longbottom Stockade'. Longbottom was described in Commissioner Bigge's 1822 report on the 'State of the Colony of New South Wales' as one of the 'three agricultural establishments in New South Wales in which convicts are employed' (Bigge 1822, 3). The report details that Longbottom was similar to Grose Farm and that convicts at Longbottom were selected for their skill at agriculture (Bigge 1822, 3). The establishment at Longbottom was described as follows:

> [Longbottom] comprises nearly 100 acres of land, consisting of a portion that was ungranted, arid another that has been since added by an exchange with the original grantee. It contains some valuable timber, which is cut and sawn upon the spot, and conveyed to Sydney in boats by the Parramatta River, on the southern shore of which part of the farm of Longbottom is situated. Charcoal for the forges and foundries is likewise prepared here; and as the land is gradually cleared of wood, the cultivation is extended under the direction of an overseer, who was a convict, and has received his emancipation. The number of men employed at Longbottom, amounted, in January 1821, to 110. This establishment is under the inspection of Major Druitt, the chief engineer, who occasionally visits it. The buildings consist of a house for the overseer, a barrack for the men, an open shed and a fireplace, a mess-room, and stabling for five horses. They are all constructed of wood, and covered with shingles. With the exception of an ornamental lodge and gateway that has been built at the entrance from the road, the buildings at this establishment have been erected with a due regard to economy, and the comfortable lodging of the convicts. (Bigge 1822, 3)
>
> Surrounding land was gradually consolidated into Longbottom and by c.1835 the property covered 936-acres, including the study area and across much of the present-day suburb of Concord. Longbottom was bounded to the south by Parramatta Road, Concord Road to the west, and Hen and Chicken Bay to the east (refer to Figure 4).

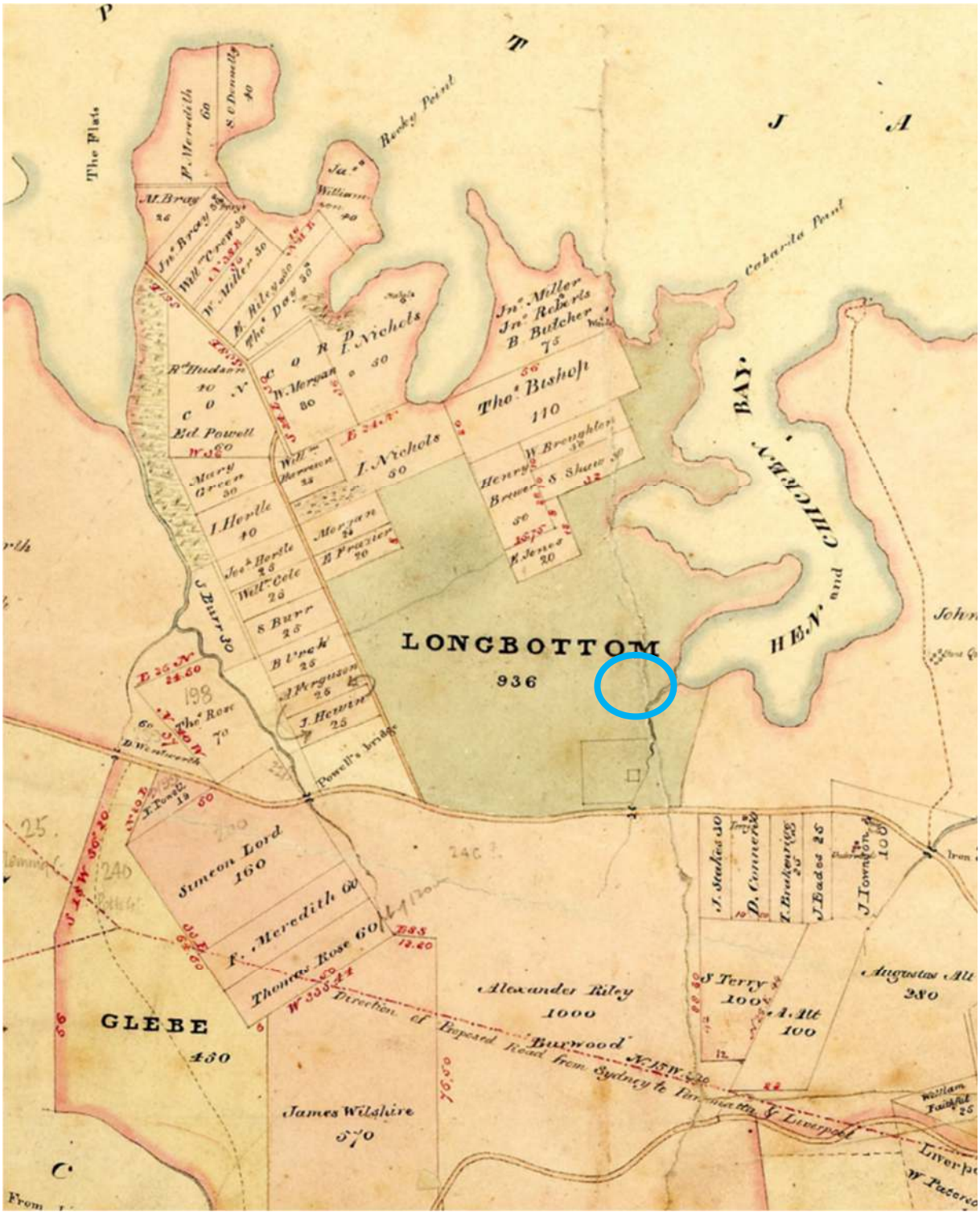

Figure 4. c.1835 Concord Parish Map, showing 'Longbottom', 'Burwood' and the outline of the stockade. The approximate location of the study area is indicated by a blue circle. *Source*: Historical Land Records Viewer.

4.1.2 Early subdivision

The early development of Longbottom was largely attributed to the busy Parramatta Road, which was formally established in 1811 although it may have had earlier Aboriginal origins as an important route through Country. By the 1830s, the estates and allotments either side of Parramatta Road began to be subdivided. The north-west portion of Longbottom Farm, which included the study area, was subdivided in the late 1830s or early 1840s and in 1843, the 'Village of Longbottom' was surveyed (AONSW Map 3383, Karskens 1986, 38). Longbottom Village likely only formalised a 'ramshackle' settlement that was already clustered around the Longbottom stockade (Karskens 1986, 18).

Longbottom Stockade briefly rose to international prominence when it housed a group of French-Canadian political prisoners in the early 1840s. Upon departure of the last Canadian exiles, the Longbottom Stockade fell into disrepair. The stockade ceased its functions in 1844 when a new gaol was constructed south of Parramatta Road at Burwood (NGH Environmental 2019, 18).

Figure 5. Detail of late 1830s or early 1840s map of Concord, showing the subdivision of the north-western half of Longbottom Stockade. *Source*: SLNSW Maps/0034.

Following the subdivision of the Longbottom Estate, the study area was granted to John Walker by Crown Grant in June 1848. The land granted to Walker comprised of two lots bounded by Stanley Street to the south, Wharf Street (now Burwood Road) to the west, and Crane Street to the north. The reserve east of the study area was described as a salt marsh and remained undeveloped.

In 1849, portions of Walker's grant were sold to Samuel Mansfield and Horatio Brett. Mansfield sold the land on in 1852 to George John Roger. It is unclear if Mansfield developed the allotment during his ownership at all. By the 1850s, the Longbottom village comprised rectangular allotments intermixed with land set aside for a Wesleyan Chapel, a school, an Episcopal Church, a Roman Catholic Church, and a town well (Karskens 1986, 30). A c.1850 map of the Village of Longbottom marks several structures, including the Longbottom Stockade and a brickmakers structure, both to the south-east of the study area (Figure 6). It is likely that stockade buildings marked are those referred to in Bigge's 1822 observations on the grant. The ground within the study area is not marked with any buildings but does have ownership marked. John Walker is labelled as the owner across both allotments. In the years following 1850, details relating to ownership have been added in pen over John Walker. In the north-east corner of the study area A.H. Neate is marked as the owner from 1867 and in the southern half of the study area E.J Downey c Lee is marked as the owner from 1866. Both marks of ownership are accompanied with the book number allowing the record of the sale or lease to be accessed.

In 1867 Martha Rogers, widow to George Roger's sold the north-eastern allotment to A. H. Neate. At the time of sale the following features on the property were noted:

> Registered No 377 Book 104 on which said land is erected a first class tannery containing twelve pits with outhouse and all and every appliances connected with the business of a tanner and currier. Also three substantially built detached verandah brick cottages, containing three rooms each with outhouses attached thereto… (Historic Lands Records Viewer, General Register of Deeds, Book 135 Number 878)

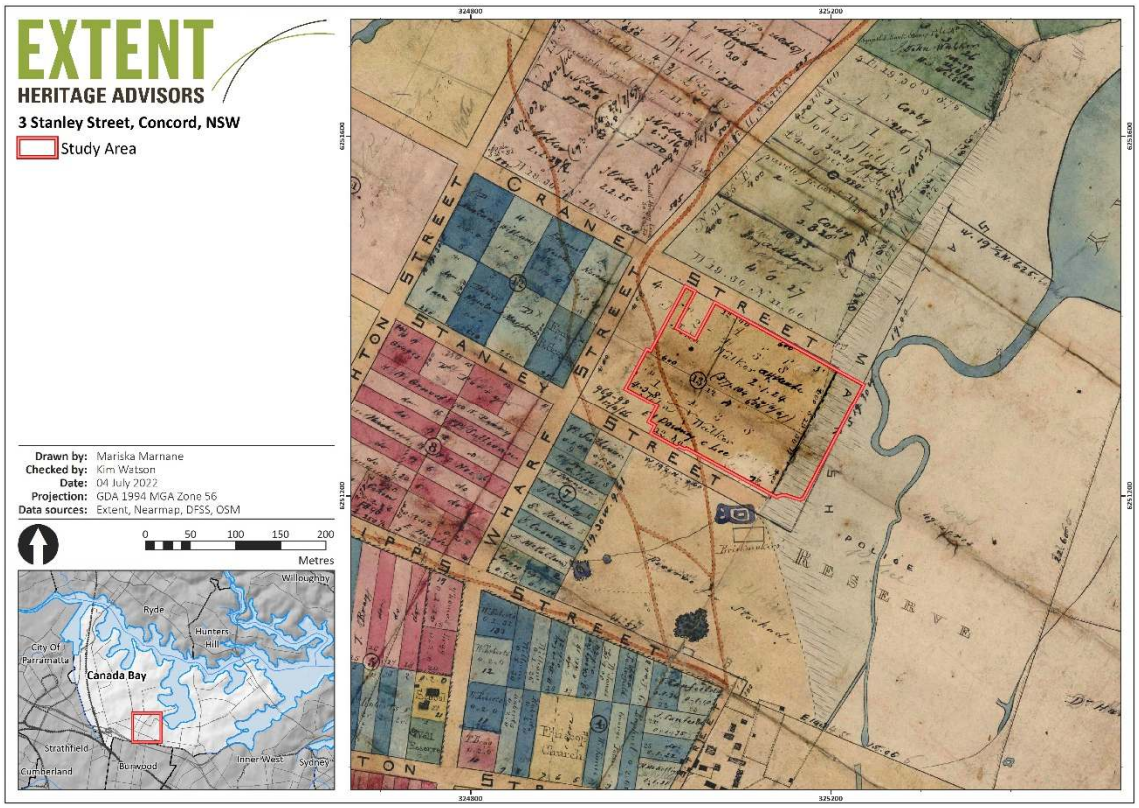

Figure 6. Detail of 'Village of Longbottom', c. 1850s. *Source*: SLNSW Maps/0471.

A New South Wales Government Gazette reported on a Supreme Court Case on the 17th of March 1873 between Alfred Neate versus several due to his owing of the debt to the other parties. The gazette indicated that the aforementioned tannery and cottages were still present on the property when listing Neate's holdings (*New South Wales Government Gazette,* 18 March 1873). It is unclear when Rogers developed the tannery and cottages and whether the structures continued to be utilised throughout Neate's ownership. In 1879, the remaining sections of the Longbottom Stockade, located to the south of the study area was dedicated a public park. The boundaries of this park were revised and rededicated in 1886 (*New South Wales Government Gazette,* 22 January 1886, 499). The area comprised 66 acres extending north from Parramatta Road to Hen and Chicken Bay and is now known as St Luke's Park (refer to Figure 7).

Figure 7. 1896 parish map of Concord showing Longbottom and the study area. It should be noted that the map does not accurately indicate the ownership of the study area as by 1896, Walker's estate was subdivided, and the Farleigh Nettheim & Co. tannery was established along Stanley Street. *Source:* NSW Department of Lands, Map RM 2535.

4.1.3 Farleigh Nettheim & Co Tannery

In 1880, the study area was purchased by Cosmann Nettheim and John Farleigh for the operation of a tannery (Historical Land Records Viewer Primary Application Number 9489). The tannery was an expansion of the Melbourne based company run by Edwin Michaelis and Isaac Hallenstein (Dodds n.d.). The company was known as Farleigh Nettheim & Co. Nettheim and

Farleigh were well known leather merchants in Sydney with their warehouse located 80 Clarence Street, Sydney and the tannery was located on Stanley Street Concord (Figure 9). At the time of purchase, the study area included some sheds and tanning pits adjacent to Stanley Street (Dodds n.d.). It is not clear if these comprise the tanning pits developed during Roger's ownership of the property in the 1860s, or if the c.1860 cottages are still extant at this time. The earliest available aerial photograph of the study area, from 1930, shows no evidence of structures in the north-eastern corner of the study area (Figure 8).

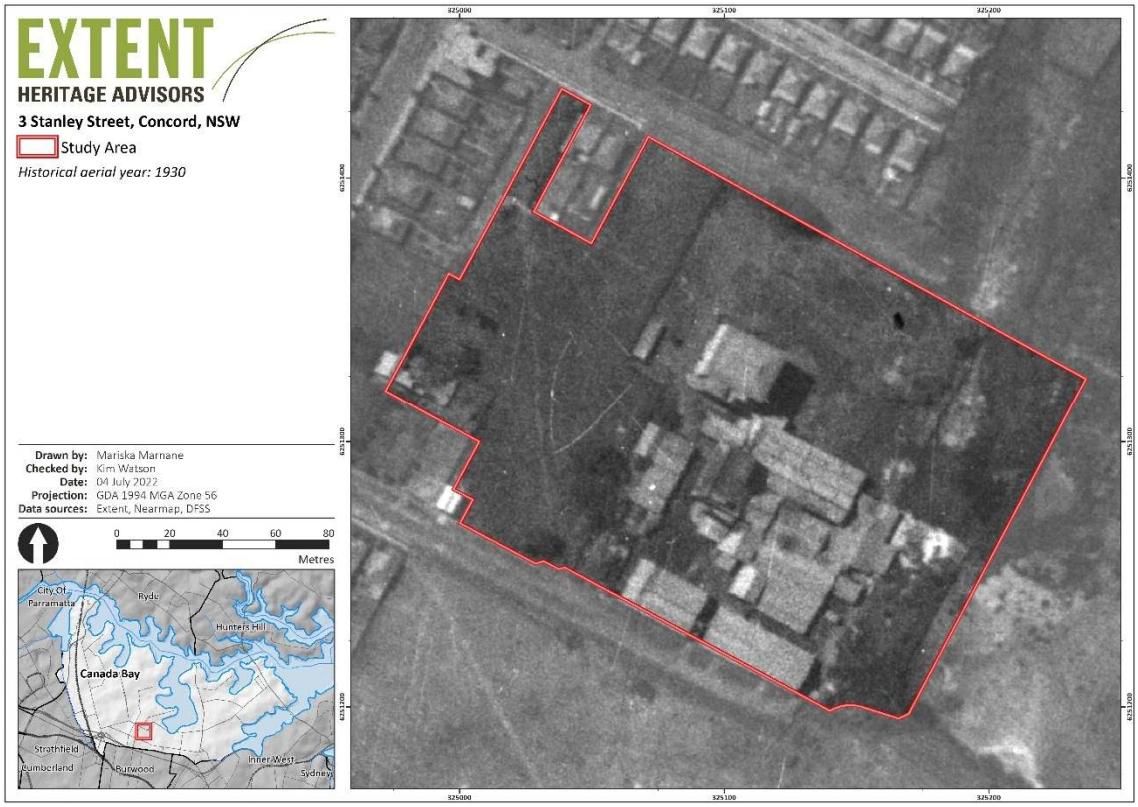

Figure 8. 1930s aerial photograph showing the development of the tannery. There are no structures visible in the north-eastern corner of the study area. Some disturbed ground, potentially rubbish or demolition material, is visible. *Source*: NSW Historical Image Viewer.

Growing operations saw the consolidation of more adjacent land to the west between 1920 and 1940 (Historical Land Records Viewer Vol. 3031 Fol. 196 and Primary Application Number 22859). To support the increasing operations, the original sheds fronting Stanley Street were demolished and a new tannery complex was constructed. The tanning pits were constructed from local hardwood and measured twelve inches by two inches. They were puddled with white pipe clay which had been dug up from the mangrove swamps to the east of the study area. The pits were separated by twelve inches of clay and were fed and drained by four-by-four-inch square timber underground pipes which carried the tanning liquor into a well and then pumped it from pit to pit (Dodds n.d.). The last general manager of Farleigh Nettheim & Co., Colin S. Dodds, noted that the from their construction in the early 1880s until the tannery closed in 1967, the pits and underground drainage system remained in working condition (Dodds n.d.).

Wastewater from the tannery was discharged into Hen and Chicken Bay, until a pumphouse was constructed at Cintra Park in c.1908, approximately 300 metres southeast of the study area

(Dodds n.d.). By 1938 the tannery consisted of an extensive complex of gable and sawtooth roof masonry warehouses, timber sheds, and a five-storey masonry structure with a water tower extending from a Dutch gable roof (refer Figure 10 through to Figure 12). Between 1930 and 1938 an additional sawtooth building was added to the site.

Figure 9. Farleigh, Nettheim & Co advertisement. *Source:* Canada Bay Heritage Society.

In addition to the new tannery facilities, an electricity substation was built c.1930 next to the tannery on Stanley Street, located to the west of current study area. The contract for the substation was awarded to Rockdale contractor, G. Yates in 1929 (Construction and Local Government Directory 1929, 16).

Figure 10. 1938 aerial photograph of the Farleigh Nettheim & Co. tannery. *Source:* Mitchell Library, State Library of New South Wales. File number FL8810356, Call number ON 447/Box 130.

Figure 11. 1938 aerial photograph of the Farleigh Nettheim & Co. tannery *Source*: Mitchell Library, State Library of New South Wales. File number FL8810358, Call number ON 447/Box 130.

Figure 12. Photograph of the five-storey structure with water tank, undated. *Source*: Peter Bryant in Canada Bay Heritage Society.

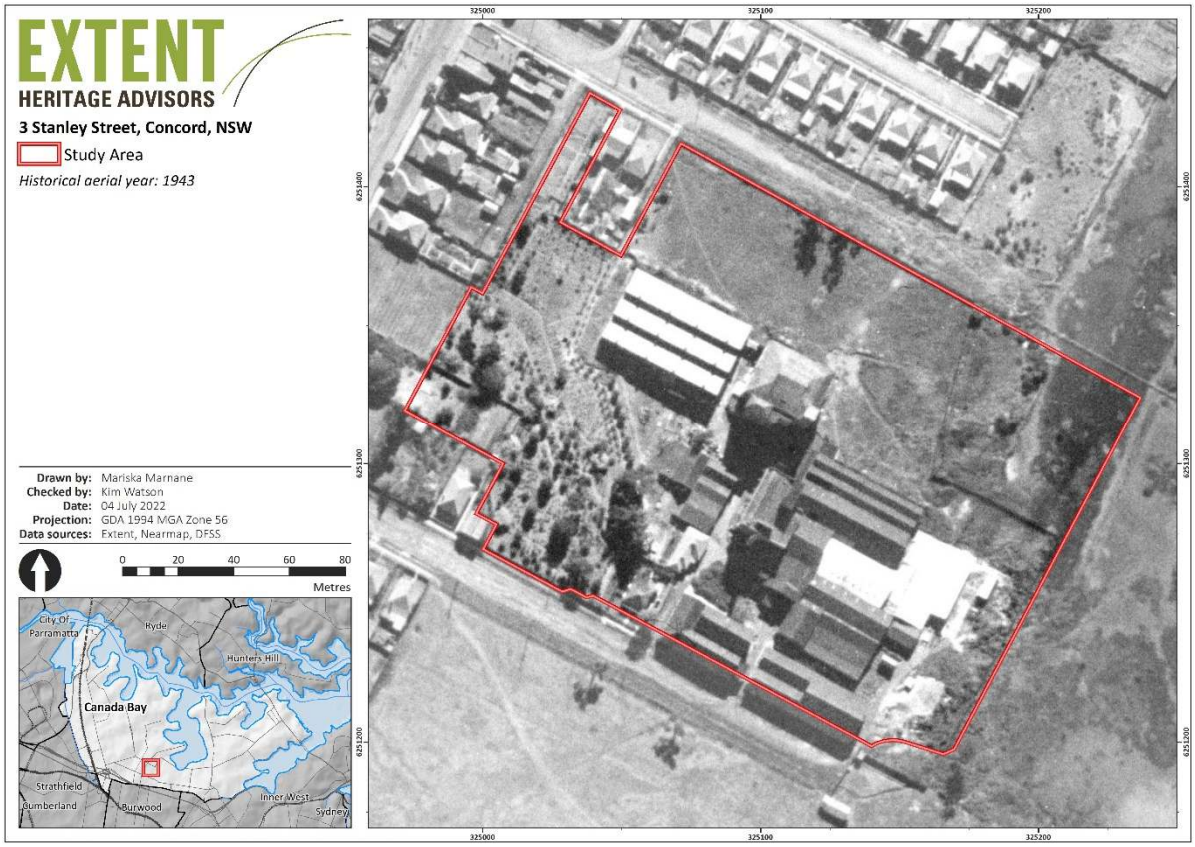

Figure 13. Historical aerial of the study area showing a landscaped area with tree plantings west of the tannery complex, 1943. *Source*: NSW Historical Imagery

By the 1930s it was common for leisure facilities to be provided at factories by employers committed to worker welfare in England and America. The beauty of nature and good landscaping was believed to provide spiritual, physical and mental benefits to factory work, and were used as a form of social engineering (Chance 2017, 92). They also represented improvements to the urban and suburban environment (Chance 2017, 64). From 1943 onwards there was an increased interest in providing formal landscaping along Stanley Street and to the west of the tannery complex. It is possible the landscaping implemented at the Farleigh Nettheim tannery, and conserved within the study area today, demonstrates the approach to landscaping for the benefit of the community and workers.

Throughout the mid-twentieth century the tannery continued to operate in Concord. In 1948, the company Farleigh Nettheim and Co was acquired with four other leather tanning operations to become Associated Leathers Pty Ltd. The group operated five tanneries, with factories making finished leather goods. The warehouses handled leather, grindery, saddlery, canvas, sports goods and a variety of other linings. Associated Leathers exported to the United Kingdom, Europe and Asia (The Bulletin 1854, 16). The layout of buildings appears to have remained much the same in the final two decades of the tannery's operation (Figure 14).

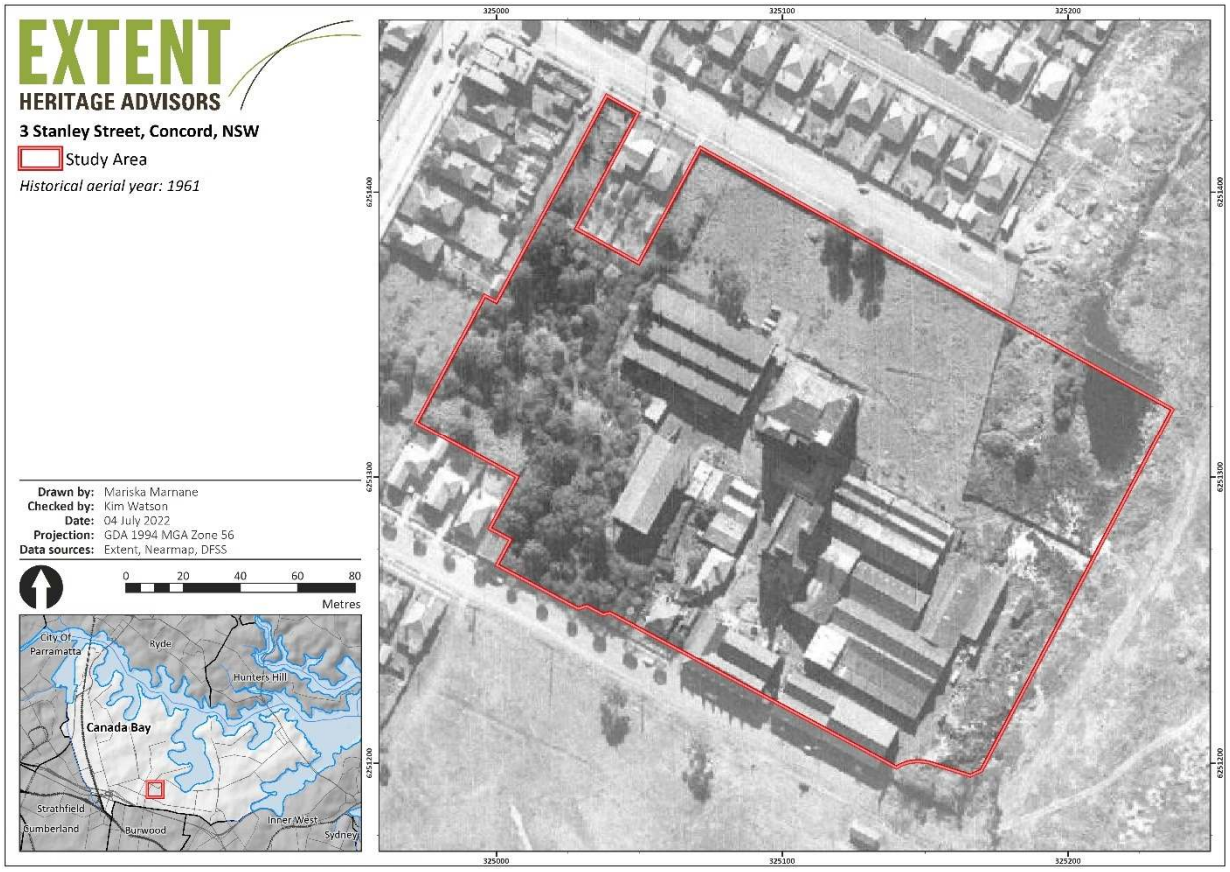

Figure 14. The study area as it appeared in 1961, the final years of operation of the Tannery. *Source*: NSW Historical Imagery.

By 1967, as the residential and urban character of Concord continued to develop, consideration was given to moving the tanning and manufacturing operations to Botany. Colin Dodds, the General Manager of the company at the time, began negotiations with the Valuer General for the sale of the property to the New South Wales Department of Education (Dodds n.d.).

4.1.4 Concord High School

In 1970 the study area was transferred to the Crown and purchased by the New South Wales Department of Education in 1970 at a cost of $650,000 (Concord High School n.d.). Following the sale, the tannery was demolished. Work began in 1978 for the construction of the new school. Reportedly the development was delayed by the discovery and removal of the tannery's concrete slabs, columns and vats (Karskens 1986, 74). A 1978 aerial photograph shows the study area being cleared and levelled (Figure 15). A stand of ornamental and indigenous trees, likely planted in the late 1930s or early 1940s was retained along the western extent of the study area (refer to Figure 10 to Figure 14, and Figure 17 and Figure 18). In April 1978 approval was granted for the establishment of a High School at Stanley Street, Concord, to be known as Concord High School (Government Gazette of NSW 1978, p.1351).

Concord High School was designed by Government Architect, Charles Weatherburn and dated c.1977. Weatherburn joined the Department of Public Works in 1938 following his graduation from the Sydney Technical College. Weatherburn progressed through the Government

Architect's Branch (GAB) before serving as the Government Architect between 1974 and 1978. Weatherburn was involved with development of the schools program from the 1970s and was also closely associated with the construction of the Sydney Opera House (Tanner Denton Kibble Architects 2018, 37).

Tenders for the construction of the school was called in October 1977 and won by C.H. Webb Brothers Pty Ltd (Concord High School n.d.). The study area remained cleared until the commencement of construction in between 1978 and 1979 (refer to Figure 15) (Concord High School n.d.).

Figure 15. Historical aerial of the study area showing the beginning of the school construction, 1978. *Source*: NSW Historical Imagery.

Figure 16. Photograph of the construction of the school campus, 1979. *Source*: State Library of New South Wales, File number: FL2734187, Call number: Government Printing Office 3 – 51274, IE number: IE2734174.

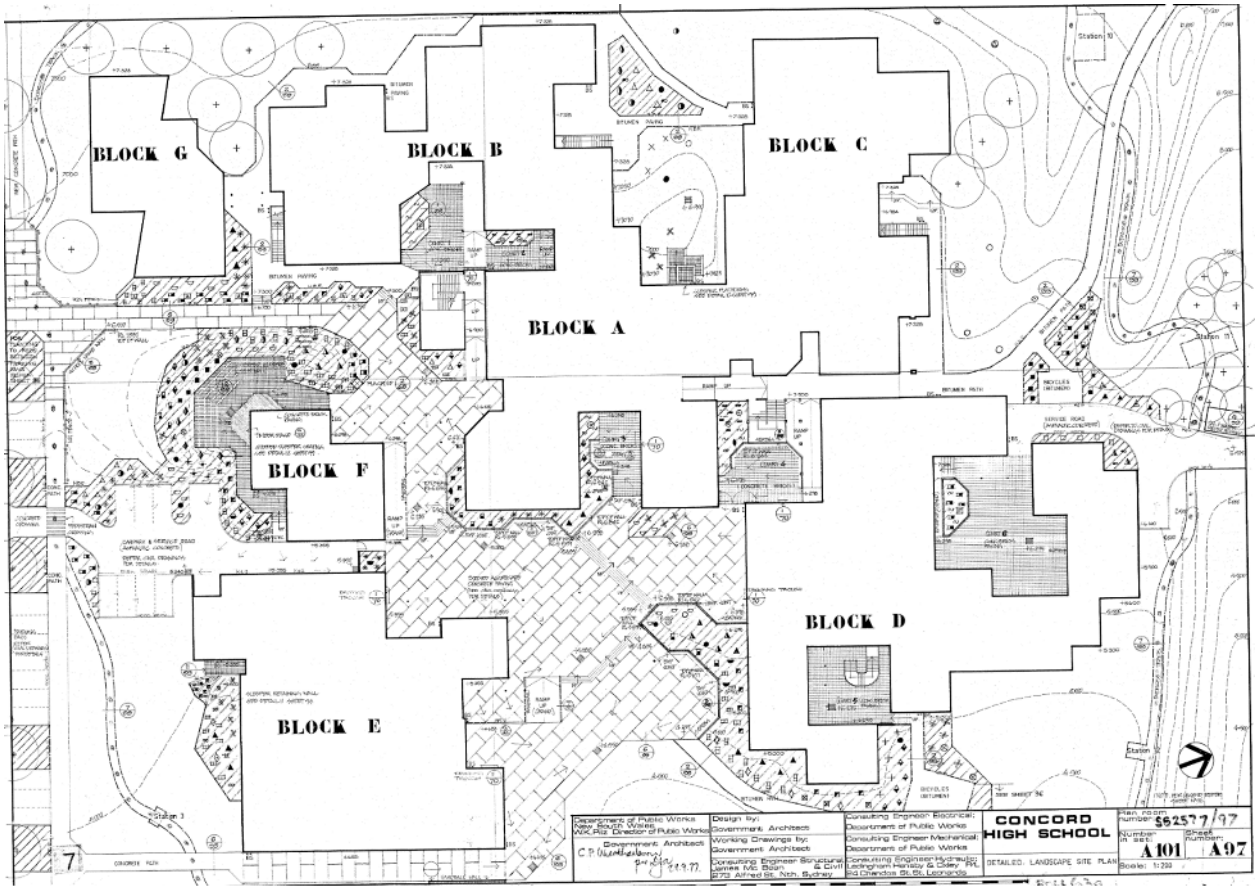

Figure 17. Landscaping site plan of Concord High School, c.1977. *Source:* Public Works Advisory plan room, SB2577_97.

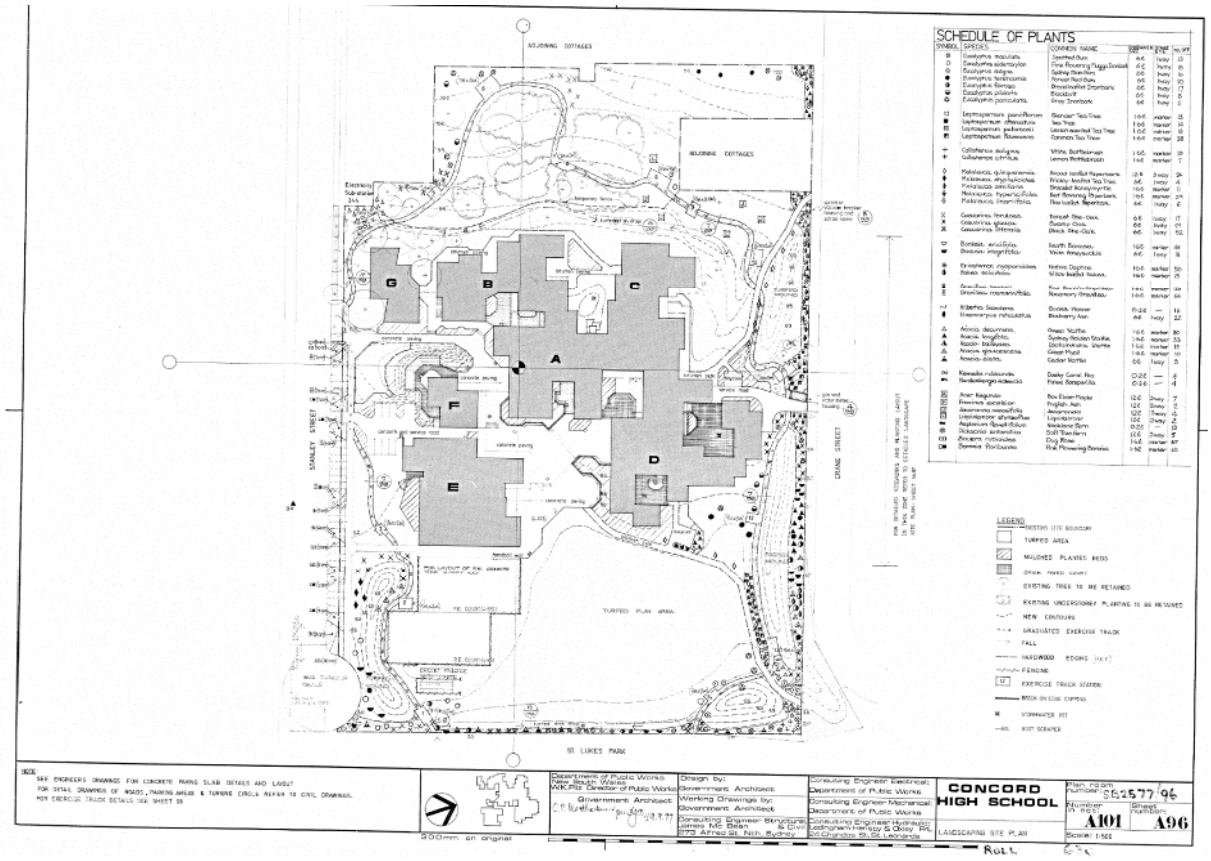

Figure 18. Schedule of plants, c.1977. *Source: Public Works Advisory plan room, SB2577_96.*

The Concord High School campus consisted of a closely spaced complex of interconnected single and double storey masonry structures presenting a distinct form featuring mono-pitched roofs surrounding internal open courtyards. A larger paved central courtyard overlooks the sports fields and courts occupying the east extent of the study area (refer to Figure 19 to Figure 24).

The philosophy of the Study 3 School style and the 1975 Secondary School Brief, of which Concord High School is an example, can be seen in the distinct layout of the school buildings, although likely a later derivation of the standard plan of the early 1970s. This can be observed in the layout of the school buildings, clustered around open courtyards, resulting from the careful consideration of circulation around shared and flexible spaces (Tanner Denton Kibble Architects 2018, 136-137). A targeted discussion on government school architecture that further explains the intent influencing these layouts is provided in Section 4.2.

The architectural aesthetic of the buildings also reflected the influence of the 'Sydney School' idiom. Popular in the decades from the 1950s, the Sydney School is characterised by the raked roof lines, load-bearing brick walls and an integration of the landscape with the arrangement and function of the buildings (Tanner Denton Kibble Architects 2018, 151).

The design of the campus was further influenced by the shift in the education emphasis towards encouraging individual development, creativity, personal autonomy, and the development of

mental and investigative skills (Tanner Denton Kibble Architects 2018, 19). A new method of 'team teaching' emerged and was undertaken in open classrooms aided by new technologies such as computers and video cassette recorders (Tanner Denton Kibble Architects 2018, 19).

Students began attending Concord High School at the beginning of the 1980 school year, despite some ongoing construction at the campus. The school was officially opened on 6 May 1981 by then Governor of New South Wales, Sir James Rowland (Concord High School n.d.).

Figure 19. Aerial photograph of the study area showing the completed Concord High School campus, 1981. *Source*: State Library of New South Wales, File number: FL2618176, Call number: Government Printing Office 3 – 36794, IE number: IE2618167.

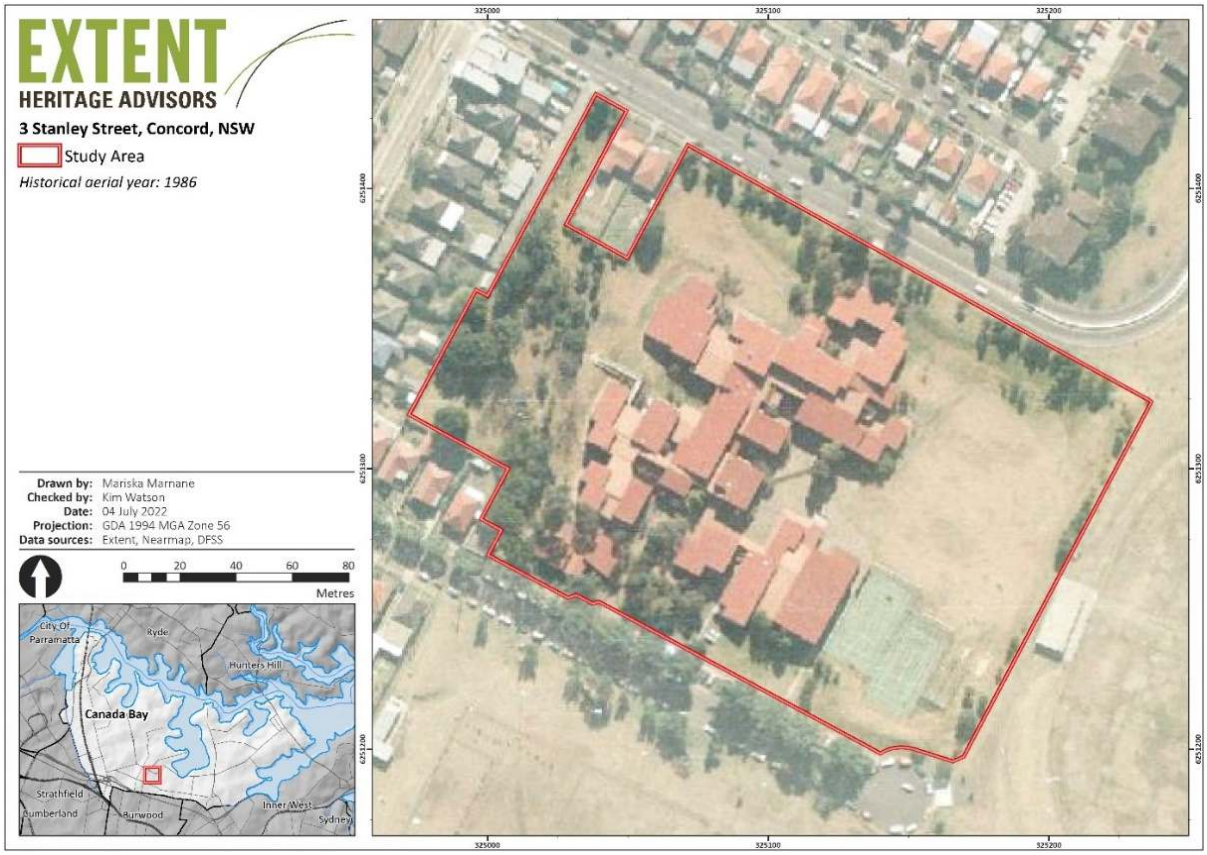

Figure 20. 1986 aerial photograph of the school complex. *Source:* NSW Historical Imagery.

Figure 21. Photograph of Concord High School from Crane Street, c.1980. *Source*: State Library of New South Wales, File number: FL2602864, Call number: Government Printing Office 3 – 36922, IE number: IE2602858.

Figure 22. Photograph of Concord High School from Stanley Street, c.1980. *Source*: State Library of New South Wales, File number: FL2477295, Call number: Government Printing Office 3 – 07464, IE number: IE2477286.

Figure 23. Photograph of the central courtyard at Concord High School, c.1980. *Source*: State Library of New South Wales, File number: FL2659676, Call number: Government Printing Office 3 – 36908, IE number: IE2659669.

Figure 24. Photograph of Concord High School, c.1980. *Source*: State Library of New South Wales, File number: FL2480223, Call number: Government Printing Office 3 – 07434, IE number: IE2480212.

4.1.5 Twenty-first century development and ongoing use

The northern extent of the study area surrounding the main entrance off Stanley Street was re-landscaped shortly after the school's opening in 1980 (Concord High School n.d.). It included raised grassed courts surrounded by deciduous and indigenous trees including various species of eucalyptus, tallow woods, blue gums and swamp she-oaks (Heritage NSW n.d.)

The campus at Concord High School remained relatively unchanged until c.2010 with only one minor structural addition to the former central courtyard structure constructed between 2005 and 2009 (refer to Figure 25). By 2016, school enrolment surpassed 1000 students (Concord High School 2016). This further increased to over 1250 students by 2018 (Concord High School 2018). This saw the introduction of demountable classroom structures located along the northern side of the campus fronting Crane Street between 2016 and 2018 (refer to Figure 26).

By 2021, Concord High School comprises of over 1300 students between year seven to twelve (Concord High School 2021). As of May 2022, the campus has expanded to occupy most of the northern side study area with works undergoing at the sports field to the east. Open areas within the school campus are limited to the sports courts fronting Stanley Street, and the heavily planted western extent of the study area (refer to Figure 27).

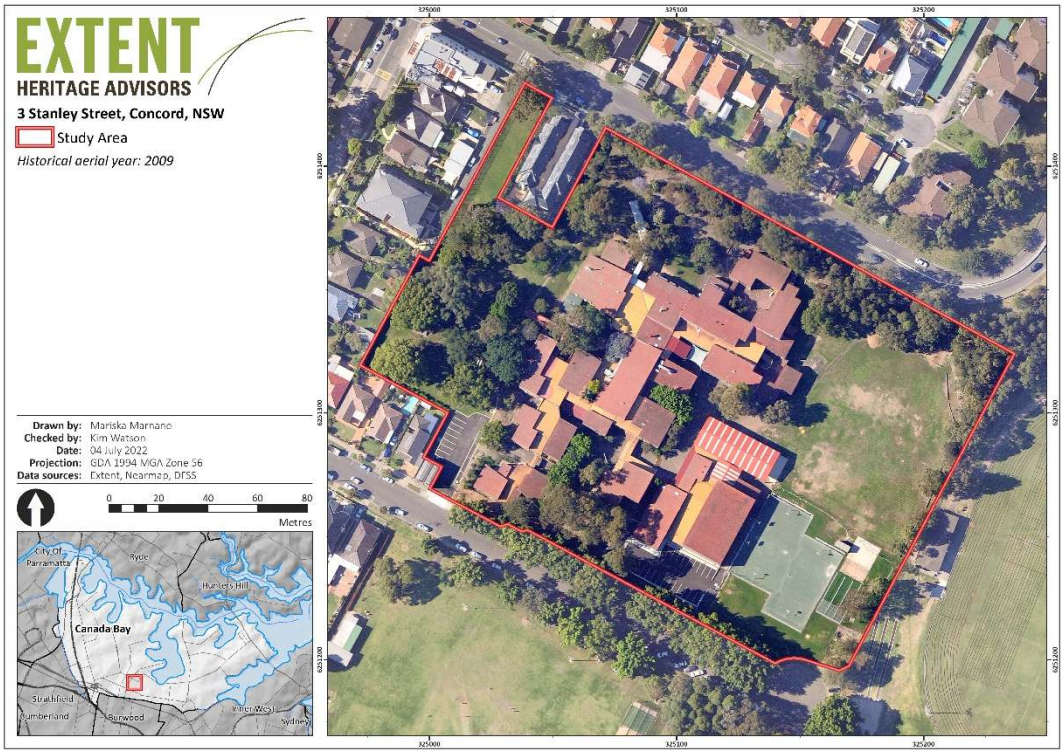

Figure 25. Historical aerial of study area showing the school campus prior to major addition. The single addition is visible at the former courtyard adjacent to the sports field and courts, 2009. *Source*: Nearmap

Figure 26. Historical aerial of study area showing the expanded school campus with demountables to the north, 2018. *Source*: Nearmap

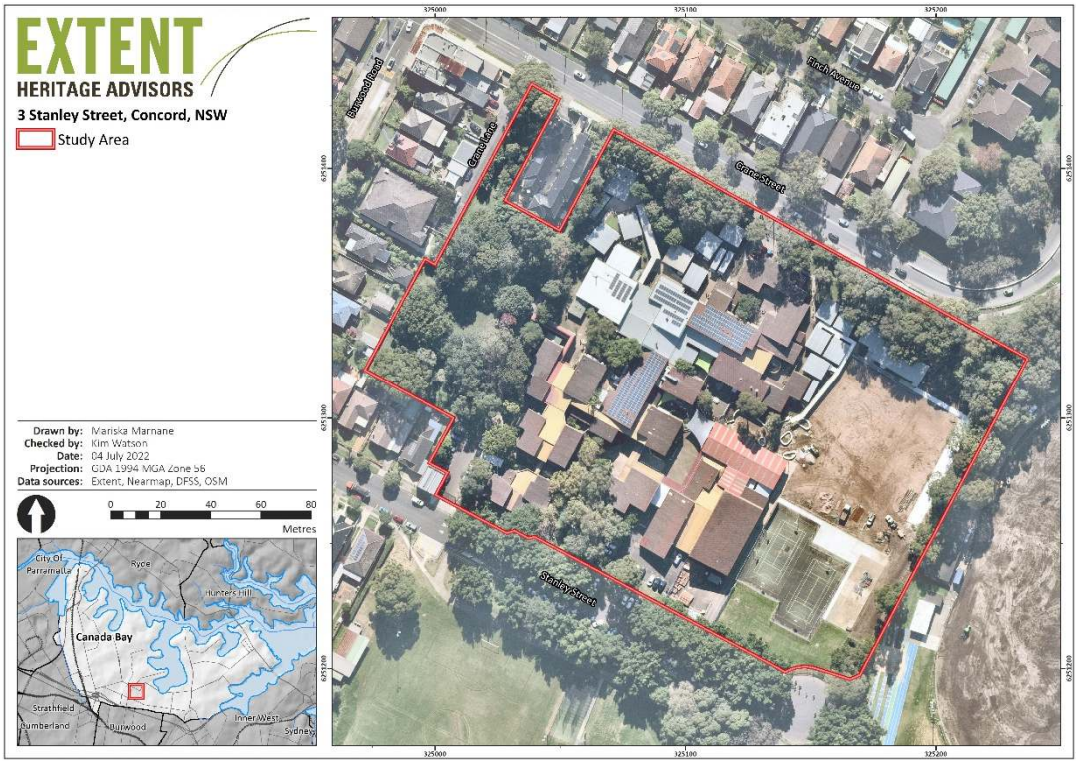

Figure 27. Aerial of the study area, May 2022. *Source*: Nearmap

4.2 Historical development of Government school architecture in NSW

The end of WWII was marked by major social and economic changes, rapid population growth and material affluence. School enrolments rose as education became recognised as 'becoming important for the social and economic advancement of the individual' (Tanner Denton Kibble Architects 2018, 16-17). The surge in demand for school buildings was affected by material and labour shortage resulting in the use and development of innovative, affordable and time efficient construction methods. This included framed construction, prefabrication, and the use of concrete in the mass-produced, newly patented building unit called 'Monocrete' (Tanner Denton Kibble Architects 2018, 121). By the late 1950's school buildings were also constructed from pre-cast concrete frames, steel frames, aluminium framed curtain walls and brick veneer (Tanner Denton Kibble Architects 2018, 123).

The Schools Section was established within the Government Architect's Branch GAB in 1962 with a research group, headed by R. Kirkwood to examine principles, needs and solutions of school designs (Jack 1980, 38). Prominent architects working in the GAB involved with school design during the post-war period include Edward Herbert Farmer, Michael Dysart, Ken Woolley, Lionel Glendenning, Peter Webber, John Whyte Thomson, and Charles Weatherburn (Tanner Denton Kibble Architects 2018, 33-37).

Harold Wyndam, Director-General of Education, developed the secondary education framework comprising of a four-year course of core subjects with the progressive increase in elective subjects leading to an external school certificate examination (Tanner Denton Kibble Architects

2018, 17). The Wyndam Scheme was implemented in 1962 as a consolidation of the trend towards comprehensive, co-educational High Schools (Tanner Denton Kibble Architects 2018, 17). Under the Wyndham Scheme, enrolments of 1,000 to 1,200 students became common at high schools. The increase demanded an expanded range of facilities and a revision of typical school design. A major development was the shift away from planning around double-loaded corridors with the implementation of single-loaded corridors as an attempt to improve congestion, cross-ventilation and acoustic conditions (Tanner Denton Kibble Architects 2018, 132).

The first attempt at resolving environmental factors within a school of an increased scale resulted in Michael Dysart's 'doughnut school' design consisting of classrooms organised around a central courtyard, accessed from internal single-loaded balconies. The steel frame with brick or concrete veneer construction was based on a standard 3.6 metre grid allowing flexibility in the design to suit unique topographical conditions. The design also allowed for additional structures to be easily constructed in stages when required (Tanner Denton Kibble Architects 2018, 132).

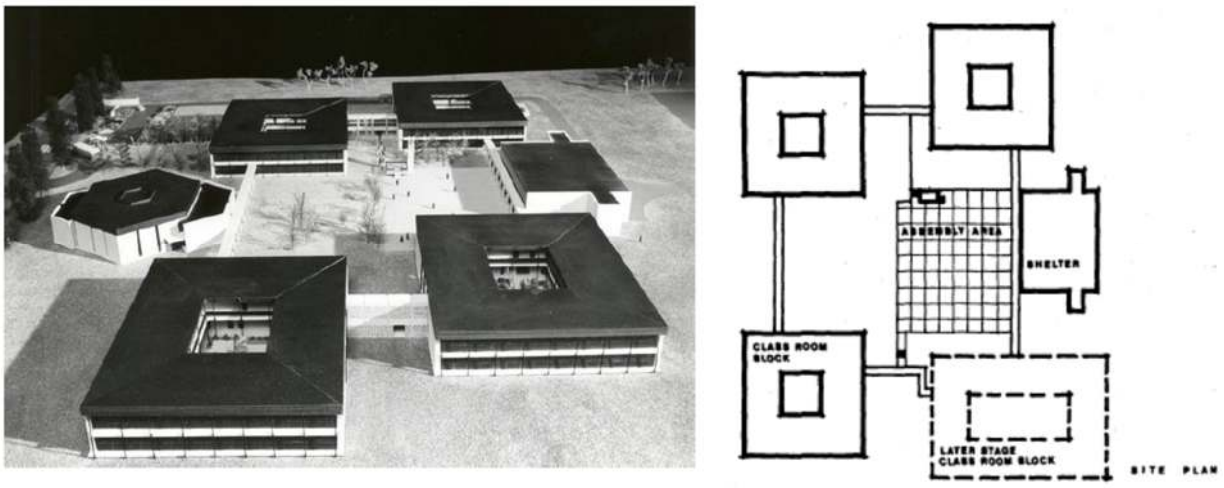

Figure 28. Model of a standard doughnut plan high school and plan sketch of the Ku-ring-gai High School (Turramurra High School) layout, 1964. *Source*: Tanner Denton Kibble 2018, 133.

The Schools' Research and Development Group (SR&DG) was formalised and led by C. Carter in 1966 (Jack 1980, 40). The SR&DG's scope was further widened to integrate environment, landscape and interior design with the formation of the Landscape Group in 1968 (Jack 1980, 40). Ever increasing enrolments made evident issues around congestion and noise experienced at doughnut schools by the late 1960s and a quick succession of school designs was subsequently developed (Tanner Denton Kibble Architects 2018, 133-134). By 1967, high schools were being designed around larger courtyard blocks, linking three buildings in stepped rows. The planning of new, larger schools was undertaken by a consortium of consultant architects along with the GAB between 1967 and 1968, and was known as 'consortium schools' (Tanner Denton Kibble Architects 2018, 134).

The first iteration developed by the SR&DG focused on an experimental steel framed prefabricated panel system with single-loaded corridors in linear blocks arranged to form a

central courtyard. Known as Study 1, only one example was constructed in 1968 at Green Valley (Tanner Denton Kibble Architects 2018, 134).

Study 2 schools was developed by 1969, solving acoustic issues by employing a staged construction approach utilising load-bearing brickwork construction. The structural module was reduced to 2.7 metres improving affordability. Other features included an enclosed multi-purpose space and operable window sashes employed in high-traffic zones as a method of controlling acoustics. Double-loaded corridors was also reintroduced to some classrooms (Tanner Denton Kibble Architects 2018, 135).

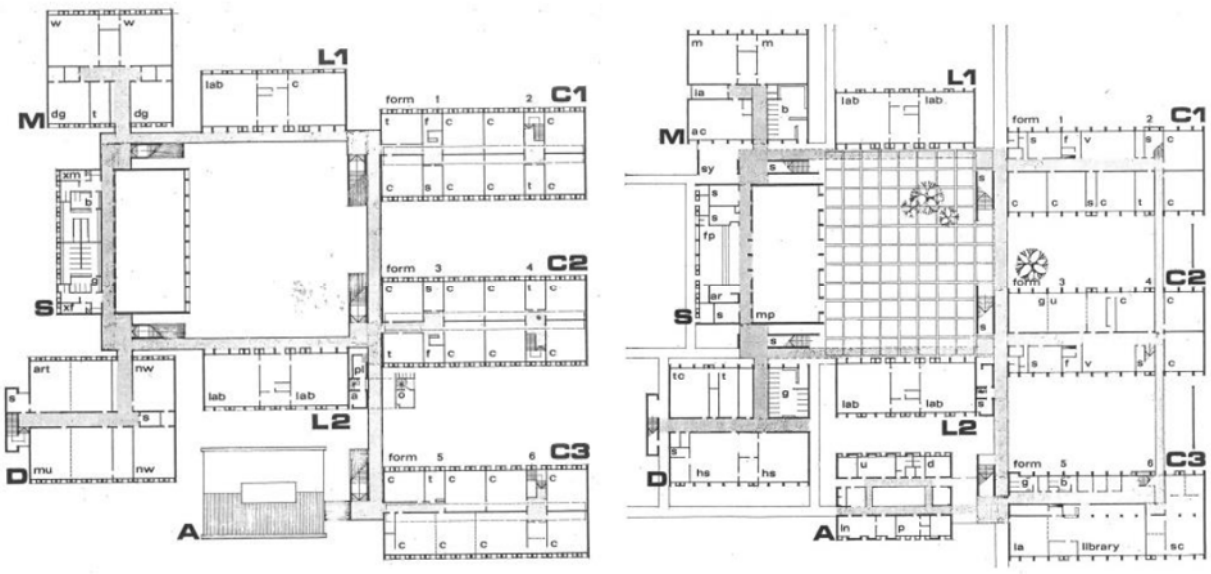

Figure 29. Standard plan of Study 2 schools. *Source*: Tanner Denton Kibble 2018, 135.

The 1970s saw the emphasis of education shift towards a more well-rounded approach – individual development, creativity, personal autonomy, and the development of mental and investigative skills (Tanner Denton Kibble Architects 2018, 19). From this, the Study 3 iteration was born. Study 3 designs was based on a 'series of room clusters' focused on subject based classrooms allowing for flexible teaching where students moved between classrooms, rather than staff (Jack 1980, 105). Study 3 school designs allowed for increased direct access to external ground floor and outdoor areas, larger multi-purpose shelters, canteens and a freestanding library. By 1972, eight standard Study 3 schools had been constructed (Tanner Denton Kibble Architects 2018, 136).

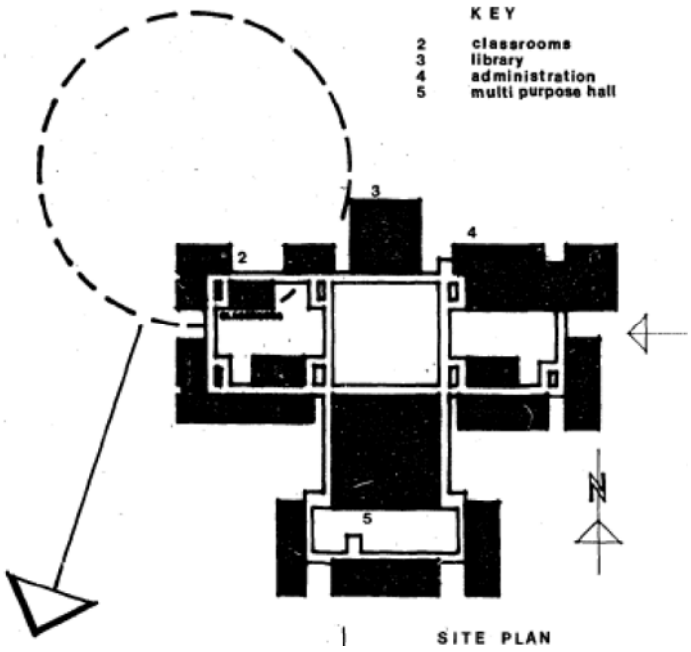

Figure 30. Standard plan of a Study 3 school at Evans High School, Blacktown. *Source*: Russell Jack, Volume 2 in Tanner Denton Kibble Architects 2018, 137.

Further change was implemented to the Study 3 scheme with the introduction of the 1975 Secondary School Brief which developed on the notion of subject base spaces and flexibility in school planning. Secondary schools were considered as 'complete entities' with school facilities that were 'shared for all'. The usage of school facilities came into focus as shared spaces. A 'core' consisting of the library and administration spaces was aligned with a close and priority relationship with 'flexible learning units'. The flexible learning units were then surrounded by specialised areas housing the Arts, Music, Home Science and Industrial Arts spaces. The arrangement was then complemented with a large multi-purpose centre. Under the 1975 Secondary School Brief, flexible learning units consisting of four learning spaces that could take groups of up to 120 students, attached to a common area, resources unit, outdoor courts and a staff study were developed (Tanner Denton Kibble Architects 136-137).

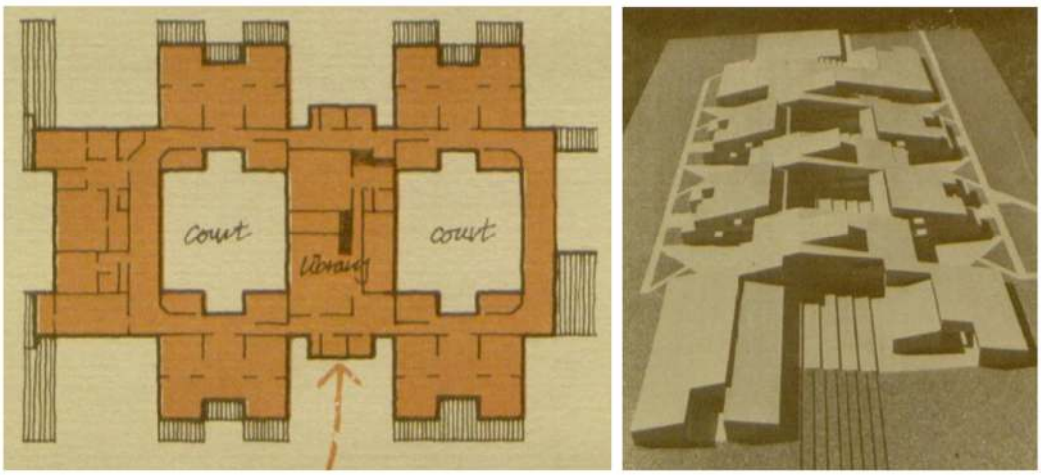

Figure 31. Diagrammatic plan and model of Kelso High School, representative of the school design influenced by the 1975 Secondary School Brief, 1976. *Source*: Tanner Denton Kibble 2018, 138.

Influences in the architectural aesthetic of some school buildings of the post-war period mirrored that of the popular Sydney School idiom. The idiom broadly developed between the 1950s to 1970s as a site-specific response to the diverse physical attributes, topography and environmental elements of Sydney (Bogle 2015). Predominantly employed for the designs of domestic residences, broad characteristics include the use of exposed materials such as brick, timber and stone. The residences were often set on steep blocks surrounded by natural bushland influencing a form consisting of raked roofs with central staircases and staggered floor levels intended to 'harmonise' and 'dramatise' with the topography and vegetation (Jackson 2019).

Architects with the GAB were also involved with the design of domestic residences including Michael Dysart and Ken Woolley. Both architects found early success with domestic architecture with both men becoming joint winners of the Australian Family Home Competition in 1958 (Tanner Denton Kibble Architects 2018, 36). Woolley later joined the firm Ancher Morlock & Murray, now known for their Sydney School style residences (Tanner Denton Kibble Architects 2018, 35). Michael Dysart's design and approach to planning heavily influenced the pattern for school design in NSW throughout his time in the GAB in the 1960s (Logan N.D, 7). Dysart's concept for the design of the schools favoured courtyard buildings with open access at ground level, arranged around a larger courtyard or playground space that could act as an assembly area. Charles Weatherburn was the Assistant Government Architect to Michael Dysart in the 1960s. Landscape design in this period received limited funding, although where possible buildings were designed so as to preserve gum trees within courtyard spaces.

In the 1970s. there was a shift to better the school environment with greater consideration given to acoustics, ventilation, lighting and eventually, landscape (Logan 2012). This followed the formation of the Landscape Group within the Design Section of the GAB in 1968 (Jack 1980, 40).

This response to school design clearly influenced the school designs of the 1970s, which adapted the use of a courtyard space and designed buildings with an architecture of strong surfaces and masses, principally brick and tile, that exhibit a deliberate attempt to blend with, and hide amongst the existing environment (Logan N.D, p.3), the principal characteristics of the 'Sydney School'.

5. Physical description

Extent Heritage carried out a physical assessment of Concord High School and surrounds on the 5 July 2022. The assessment involved an investigation into the built form and landscape setting. The physical description is limited to the exterior of the buildings. It does not provide a detailed investigation of all fabric but an overview of the elements of the place to assist in determining significance.

5.1 General

The study area comprises the Concord High School campus. The campus is bordered by Crane Street to the north, Stanley Street to the south St Luke's Park to the east and residential development to the west. The area is characterised by low density residential development surrounding sporting and recreational facilities. The topography gently slopes to the east towards Chicken and Hen Bay and comprises reclaimed land.

The primary entrance to Concord High School is accessed from Stanley Street with additional entrances on Crane Street. The core of the site comprises a collection of closely spaced 1970s education institutional buildings, with additional demountable buildings added to the north and northeast of the study area. The buildings are connected by a series of open and covered courtyards and concrete paths.

Open grounds are immediately located to the east and west of the school complex. The grounds include a grassed area to the west that feature mature cultural plantings from the late 1930s, with later c.1970s plantings along the northern boundary. The eastern portion of the study area contains sporting fields, with a new sporting field under construction.

5.2 Built structures

Concord High School comprises structures that date from c.1978 to 2016. These structures have been grouped according to their period of construction as known from historical aerial imagery and documentary sources.

The c.1970s campus (Blocks A to G)

The core of the campus is located in the centre of the study area and comprises seven main blocks connected by concrete courtyards and paths. The buildings contain classrooms organised by faculty, a library, administrative office, hall, canteen, and stores.

The campus buildings are predominately double storey with skillion roofs and brown face brick masonry walls. The brick is laid in the stretcher bond pattern. The roofs appear to contain a mix of terracotta tile and klip-lok roof sheets with square box gutters. The fenestration on the facade is achieved through the use of vertical concrete panels above and below window openings. The concrete panels are cast in situ to resemble timber weatherboards. Windows are generally metal framed with large fixed upper panes with small horizontal casements below. They are typically grouped in horizontal rows. The buildings are nestled into the landscape and surrounded by garden beds and landscaped mounds, becoming a recessive element in the landscape.

The site is surrounded by a tall palisade fence, a later addition to the study area.

Although the buildings date to the late 1970s, they feature modern architectural influences of the 'Sydney School'. 'Sydney School' refers to a period of modern Australian architecture between the 1950s and 1980s that saw design choices driven by the natural environment (Bogle 2015). Buildings were designed to harmonise with their environment, although the term is generally applied to residential houses, shared characteristics associated with this architectural movement demonstrated within the study area include the use of face brick, large windows, skillion roofs and landscaped gardens throughout.

The buildings are considered to be in a fair to good condition.

Figure 32. View south to entrance of school at Stanley Street showing landscaped gardens.

Figure 33. View north towards block A and Block B.

Figure 34. View southwest to Block G.

Figure 35. View north to Block G.

Figure 36. View west to Block A.

Figure 37. View west to Block B.

Figure 38. Overview of concrete paved courtyard leading to canteen and hall.

Figure 39. View to entrance to school hall.

Figure 40. Example of landscaped gardens framing courtyard between block A.

Figure 41. View to Block B.

Figure 42. View west from Block B to landscaped grounds to the west.

Figure 43. View towards Block G.

Figure 44. View to contemporary landscaping.

Figure 45. View north to Block A.

Demountable buildings (c. 2016)

The collection of demountable buildings, located to the north and northeast of the study area, date to c.2016. They are simple, prefabricated metal structures built atop brick piers. They are accessed via an external metal stairway and are connected by concrete paths.

The demountable buildings are considered to be in good condition.

Figure 46. View to demountable buildings located in the northeast of the study area.

Figure 47. View to demountable buildings located in the northeast of the study area.

Figure 48. Overview of demountable buildings connected by sheltered concrete foot path.

Figure 49. View to demountable buildings located adjacent to new turf field.

Figure 50. Overview of demountable buildings located off Crane Street.

Figure 51. Overview of demountable buildings located off Crane Street and adjacent to landscaped mound.

5.3 Landscape features

The core campus is surrounded by a planned landscape setting comprising garden beds and opens grounds. The landscape features can be broken into four groups:

- Cultural plantings (c.1930s);
- Cultural plantings (c.1970s);
- Planned gardens (c.1970s): and
- Contemporary features.

Cultural plantings (c.1930s)

Cultural plantings dating to the 1930s are observed in the western portion of the school grounds. The grounds to the west contain remnant cultural trees associated with landscaping efforts undertaken in the late 1930s by the Farleigh Nettheim tannery. The trees conserved within the western portion include a variety of mature endemic trees, such as spotted gums, flame bottletrees, eucalyptus trees, lemon scented tea trees, and She-oaks. Other exotic trees include Cinnamomum camphora, Toona ciliata, and Liquidamber.

Based on historical aerials, it is unclear which extant plantings in the western portion of the study area are remnant cultural plantings from the 1930s and which are plantings that relate to the cultural planting activities undertaken in the 1970s.

Figure 52. Overview of planting in the western grounds.

Figure 53. View north to remnant cultural plantings dated to c.1930s.

Figure 54. Overview of plantings, c.1930s.

Figure 55. Overview of plantings, c.1930s.

Figure 56. View to mature Camphor laurel c.1930s.

Figure 57. Overview of cultural plantings in the western portion.

Cultural plantings (c.1970s)

Cultural plantings dating to the 1970s are associated with the planned landscape of Concord High School. Cultural plantings from the late c.1970s are observed throughout the study area, with a particular cluster along the northern boundary of the study area fronting Crane Street. The plantings include several mature endemic trees such as various species of eucalyptus trees, spotted gums, flame bottletrees, lemon scented tea trees, and She-oaks. Significant plantings along Stanley Street include the row of mature *Ficus microcarp's*.

Figure 58. View to landscaped mound with plantings dated from the late 1980s.

Figure 59. View to mature Ficus microcarpa located along Stanley Street.

Figure 60. View north to plantings along Crane Street.

Figure 61. Plantings located in the northeast corner of the study area, fronting Crane Street.

Planned gardens (c.1970s)

There are several planned gardens located throughout the school campus, framing buildings pathways, courtyards, and carparks. The plantings contained within the garden beds feature a mix of exotic and native plants with timber edging. Of particular note is the landscape surrounding Block F including a small amphitheatre surrounding an open stage. The amphitheatre comprises four stepped platforms constructed of brick pavers and timber edging.

Figure 62. Landscaped mound framing entrance and Block F.

Figure 63. Detail of landscaped amphitheatre fronting Block F.

Figure 64.Overview of gardens framing Block B and Block A.

Figure 65. View to gardens adjoining Block A.

Figure 66. View to landscaped mound and garden framing the southeast carpark.

Figure 67. Overview of landscape garden framing the southeast carpark.

Contemporary features

Contemporary landscape features within the study area include a newly landscaped concrete plaza with associated seating and a new sporting field, under construction. The new plaza includes seating for spectators atop landscaped concrete platforms. The seating will front the turfed sporting field, at present under construction. Elements constructed to date include concrete slab paths and contemporary plantings on the eastern boundary.

Figure 68. Turfed sporting field under construction.

Figure 69. Overview of new plaza fronting the sporting fields.

Figure 70. View of contemporary plantings along the eastern boundary of the study area.

Figure 71. View to concrete slabs framing the turfed area.

5.4 Settings and views

The site is an operational high school set within Concord's residential landscape, bounded by Crane Street to the north and Stanley Street to the south. The area surrounding the school is characterised by low-density residential development, adjacent to a large sporting and recreational centre with St Luke's Oval and St Luke's Park to the south and east of the study area respectively.

Although surrounded by residential buildings, Concord High School does not have a highly visible presence in the streetscape. The buildings are largely obscured by mature plantings

along Stanley and Crane Streets. The mature *Ficus microcarpa's* along Stanley Street are particularly notable landscape features that obscure views from the public domain. Views are further shielded by the tall palisade fence surrounding the study area.

Figure 72. View through tall palisade fence and gardens.

Figure 73. View west along Stanley Street showing mature Ficus microcarpa's obscuring views to the study area from the public domain.

5.5 Geotechnical and environmental investigations

CMW Geosciences, 2022 'Concord High School Upgrade 3 Stanley Street Concord NSW 2137, Geotechnical Investigation Report'.

In June and July 2022 CMW Geosciences undertook a geotechnical study of the study area. A report was prepared on the findings in August 2022. For the study, thirteen machine drilled boreholes were bored. Of these thirteen boreholes, four were excavated to a depth of 10m. The other nine were generally terminated between 1.5m and 3m below ground surface (Figure 74).

The August 2022 report summarised the subsurface conditions encountered during the borehole testing. Generally fills and residual soils consisting of sandy clay, crushed rock, gravelly sand and sandy clay soils were encountered between ground surface and depths of 3m. Beneath these fills and residual soils, sandstone bedrock was observed at a depth of 4.5m to 7.5m. BH11 and BH11A both refused at 250mm, with CMW Geosciences suggesting the possible presence of concrete slabs or obstructions at this location.

Of importance to this impact assessment, the geotechnical report stated that any fill encountered on the site is considered uncontrolled and recommended that any fill encountered on site to a depth of between 0.1m and 4.5m should be removed. On the eastern side of the study area, fills were observed between ground level and a maximum of 4.5m depth in the south-east corner of the study area and 2.7m in the north-east corner. On the western side of the study area fills were observed between 0.1m and 1.5m below ground level.

Figure 74. Site investigation plan with borehole locations. *Source:* CMW Geosciences.

6. Heritage significance

6.1 Assessment of built heritage significance

The NSW Heritage Manual (Heritage Office and Department of Urban Affairs and Planning 1996) was developed to provide the basis for an assessment of heritage significance of an item or place. This is achieved by evaluating the place or item's significance in reference to specific criteria, which can be applied at a national, state or local level. The significance of Concord High School will be assessed against these criteria below in section 6.1.2 below.

6.1.1 Existing statement of significance

The existing statement of significance for Concord High School is quoted from the State Heritage Inventory for 'Concord High School grounds – landscape':

> School grounds conserving former garden trees from c.1930/40 period. Indigenous trees up to c.80 years old and a consciously designed entry landscape from c.1970 enhancing the building group and the general environs and streetscape.

6.1.2 Assessment against criteria

An assessment of heritage significance is recorded on the State Heritage Inventory database for 'Concord High School grounds – landscape'. This assessment is reproduced below with additional material added where appropriate.

Criterion (a) An item is important in the course, or pattern, of NSW's cultural or natural history (or the cultural or natural history of the local area);

SHI comment

No comment provided in SHI

Extent Heritage assessment

The site is of some historical significance at the local level for its conservation of landscape elements associated with the Farleigh Nettheim tannery, which operated on site from the late 1890s to 1967. Trees planted in the late 1930s and early 1940s are retained in the western portion of the study area.

The landscape is also historically associated with the development of Concord High School in the late 1970s. The landscape conserves a collection of modern education institutional buildings and landscape features designed by Government Architect, Charles Weatherburn.

The item reaches the threshold for listing as a local heritage item under this criterion.

Criterion (b) An item has strong or special association with the life or works of a person, or group of persons, of importance in NSW's cultural or natural history (or the cultural or natural history of the local area);

SHI comment

No comment provided in SHI

Extent Heritage assessment

The school was designed by Government Architect, Charles Weatherburn and has associative significance at the local level. Charles Weatherburn joined the NSW Public Works Department in 1939,

where he held the position of Government Architect from 1974 to 1978. He is a notable architect who played an instrumental role in the construction of the Opera House, following Jorn Utzon's departure from the project in 1966 and worked on the Governments behalf to complete the project.

The site meets the threshold for local heritage listing under this criterion.

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

SHI comment

School grounds conserving former garden trees from c.1930/40 period. Indigenous trees up to c.80 years old and a consciously designed entry landscape from c.1970 enhancing the building group and the general environs and streetscape.

Extent Heritage assessment

Concord High School holds a moderate degree of aesthetic significance at the local level for its conservation of plantings associated with landscaping efforts undertaken by the Farleigh Nettheim tannery in the late 1930s and planned gardens and cultural plantings associated with the late 1970s campus of Concord High School.

The c.1930 cultural plantings were likely planted to improve the urban landscape in response to the residential growth of Concord during this time. The trees conserved within the western portion include a variety of mature endemic trees, such as spotted gums, flame bottletrees, eucalyptus trees, lemon scented tea trees, and She-oaks. Other notable trees include a mature jacaranda and camphor laurel. The landscape associated with the former tannery, in its current form has diminished over time due to land clearing activities for the construction and landscaping of the high school. However, this area still makes a notable contribution to the collective aesthetic values of the site.

The campus retains its aesthetic significance as an intact late 1970s school campus that demonstrates architectural influences from the 'Sydney School' idiom. The site arrangement demonstrates typical characteristics of the standard designs and policies employed by the Government Architect's Branch in the 1970s. The school buildings and landscape features reflect a shift in in educational concepts and school design of the time. The aesthetic significance is enhanced by the relationship between the built form and landscape setting which is characteristic of the 'Sydney School'. This is demonstrated through the sites use of face brick, skillion roof and domestic scale of building nestled within landscaped gardens containing a mix of native and exotic plantings. The landscaped gardens were planned to compliment the built form so that the site, including landscape, is experienced holistically. Notable landscape elements include the planned gardens and indigenous trees planted throughout the site, and row of mature *Ficus microcarpas*.

The study area has a moderate degree of aesthetic significance at the local level through the retention of a high degree of fabric, form, and landscape setting. The item reaches the threshold for listing as a local heritage item under this criterion.

Criterion (d) An item has strong or special association with a particular community or cultural group in NSW (or the local area) for social, cultural or spiritual reasons;

SHI comment

No comment provided in SHI

Extent Heritage assessment

The item may hold social value to the local community and former students and staff of Concord High School. However, it is unlikely that the landscape retains a strong association to groups associated with the tannery.

It is not considered to meet the threshold for local heritage listing under this criterion.

Criterion (e) An item has potential to yield information that will contribute to an understanding of NSW's cultural or natural history (or the cultural or natural history of the local area);

SHI comment

No comment provided in SHI

Extent Heritage assessment

The site of an 1860s tannery and cottages, and the 1880 Farleigh Nettheim & Co Tannery has a moderate degree of research potential relating to the historical development of the site and potential archaeological resources. Evidence may offer new information on industry in the area in the 1860s and during its use by Farleigh Nettheim & Co Tannery from 1880 until the late twentieth century. Such information may enhance existing knowledge of this period and of the historical development of the area.

Criterion (f) An item possesses uncommon, rare or endangered aspects of NSW's cultural or natural history (or the cultural or natural history of the local area);

SHI comment

No comment provided in SHI

Extent Heritage assessment

Concord High School demonstrates a degree of rarity at the local level as a post-modern high school listed for its planned landscape values.

The item reaches the threshold for listing as a local heritage item under this criterion.

Criterion (g) An item is important in demonstrating the principal characteristics of a class of NSW's cultural or natural places; or cultural or natural environments. (or a class of the local area's cultural or natural places; or cultural or natural environments.)

SHI comment

No comment provided in SHI

Extent Heritage assessment

The landscape features conserve cultural plantings associated with the Farleigh Nettheim tannery and planned gardens associated with the construction of Concord High School in the late 1970s. The site arrangement demonstrates representative of the standard designs and policies employed by the Government Architect's Branch in the 1970s.

The item reaches the threshold for listing as a local heritage item under this criterion.

6.1.3 Revised statement of significance

Concord High School is significant at the local level for its historical, associative, aesthetic, research / scientific, rarity and representative values. The remnant elements of cultural plantings associated with the Farleigh Nettheim tannery and school complex dating to the late 1970s retain some historical significance at the local level.

The site has moderate significance for its association with Government Architect, Charles Weatherburn who designed Concord High School. The aesthetic values of the site are primarily attributed to the landscape elements comprising of cultural plantings dated to the late 1930s, and planned landscape features dated to the late 1970s. However, the site collectively holds some aesthetic significance as an intact late 1970s school campus with architectural influences from the 'Sydney School'. The school buildings and landscape features reflect a shift in in educational concepts and school design of the time and are representative of the standard designs and policies employed by the Government Architect's Branch in the 1970s. The aesthetic values of the site are enhanced by the relationship between the built form and landscape setting. The landscape was designed to ensure the buildings harmonised with the

environment, reflecting some architectural influences attributed to the 'Sydney School'. This is demonstrated through the site's use of face brick, monoplane roofs and domestic scale of building nestled within landscaped gardens containing a mix of native and exotic plantings. Notable landscape elements include the planned gardens and indigenous trees planted throughout the site. The study area has a moderate degree of aesthetic significance at the local level through the retention of a high degree of fabric, form, and landscape setting.

The site also has a moderate degree of research potential relating to the historical development of the site and potential archaeological resources. Evidence may offer new information on industry in the area in the 1860s and during its use by Farleigh Nettheim & Co Tannery from 1880 until the late twentieth century. Such information may enhance existing knowledge of this period and of the historical development of the area.

Detailed research has determined the study area demonstrates a moderate degree of rarity at the local level as an intact example of a late 1970s planned landscape, that demonstrates the influence of 'Sydney School' on school design in the post-war period. The site arrangement, however, demonstrates representative qualities of the 1975 Secondary School Brief, which was a standard school plan adopted in the mid to late 1970s by the Government Architects.

6.2 Gradings of contribution

The following table grades the contribution of specific elements within the study area that relate to the heritage significance of Concord High School. Grading the levels of contribution an elements makes to a site, is a management tool used to assess the relative significance of elements within an item, place, or site, and to assist in decision-making regarding elements of a place. The gradings that have been used for elements within the site are based on guidelines established in the NSW Heritage Division publication *Assessing Heritage Significance*.

Table 2. Summary of elements grading their contribution to heritage significance.

Element	Grading	Justification
Block A to G – external	Moderate	Blocks A to G comprise the original configuration of the school, which was constructed in the late 1970s, c.1978. The buildings demonstrate architectural influences of the 'Sydney School' architectural style and are arranged in a design that is consistent with the 1975 Secondary School Brief. The buildings contribute to the landscape significance of the item.
Block A to G – internal	Little	The interiors are likely to have subject to periodic and piecemeal alterations overtime and are likely less intact that the exterior. They are not considered to be key contributors to the heritage significance of the item.
Block R – external and internal	Little	Blocks R is a later addition to the site, built c.1980s. Does not form part of the original configuration of the school.

Element	Grading	Justification
Demountable buildings	Intrusive	The demountable buildings are modern fabric with no identified heritage values.
Garden beds (inclusive of plantings)	High	The garden beds comprise of planned landscape features associated with the original configuration of the school. They are a key contributor to the significance of the item.
Cultural plantings - exotic and indigenous trees c.1930s	High	Remnant cultural plantings dated from the c.1930s are historically significant landscape features that relate to the former Farleigh Nettheim tannery.
Cultural plantings - exotic and indigenous trees c.1970s	High	The cultural plantings dated from the 1970s relate to the planned landscaping efforts the original configuration of the school. They are a key contributor to the significance of the item.
Sporting fields	Moderate	The sporting fields form part of the planned landscape of Concord High School. However, it is likely they have been subject to modifications over time. They contribute to the overall significance of the item.
Carpark	Little	Contemporary alterations that do not make a notable contribution to the planned design of the school.
Contemporary sporting fields	Little	Contemporary alterations that do not form a part of the planned design of the school.
Contemporary landscaping	Little	Contemporary alterations that do not form a part of the planned design of the school.

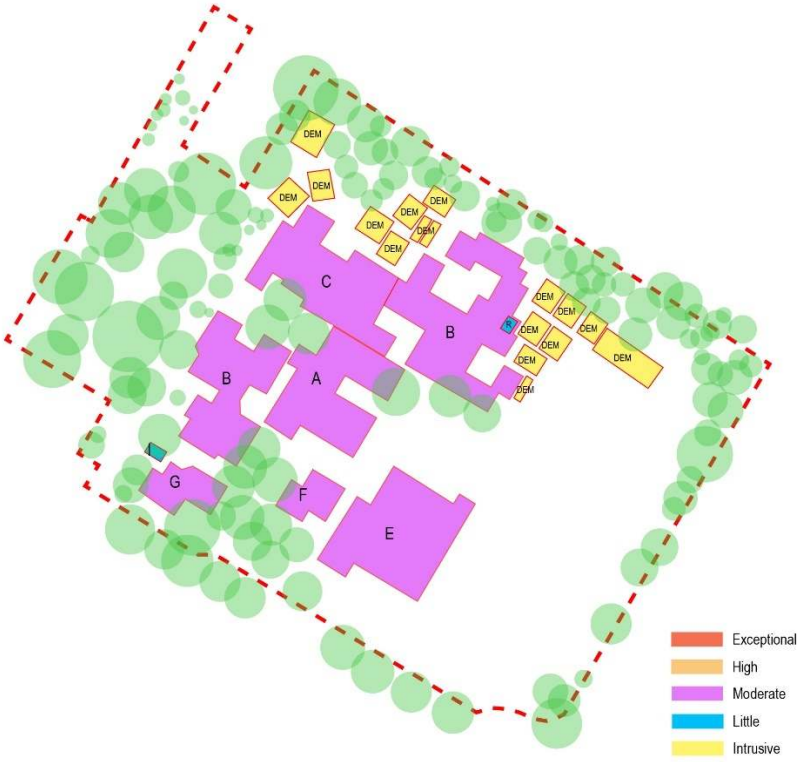

Figure 75. Plan of Concord High School showing the contribution of elements. *Source:* Extent Heritage.

Figure 76. Plan showing contribution of landscape elements. *Source:* Extent Heritage.

Figure 77. Plan showing significant cultural trees within the study area. *Source:* Extent Heritage.

6.3 Significant trees

The Arboricultural assessment prepared by Birds Tree Consulting Pty Ltd considered the vegetation of the existing landscape and detailed the health and condition of trees within Concord High School, including trees along Stanley Street, outside the school boundary. The assessment of landscape significance and retention value of vegetation was determined using a combination of environmental, cultural, physical, and social values. This is made in accordance with the Institute of Australian Consulting Arboriculturists (IACA) Significance of a Tree, Assessment Rating System (STARS). The preliminary report noted that of the 142 trees observed, 57 are identified as being of high environmental and landscape significance. The trees range in species and age. Refer to plan below (Figure 78).

Trees identified as being of moderate and high environmental and landscape significance within the Birds Tree Consulting Pty Ltd, includes cultural trees of heritage values within the site dated to c.1930s and c.1970s.

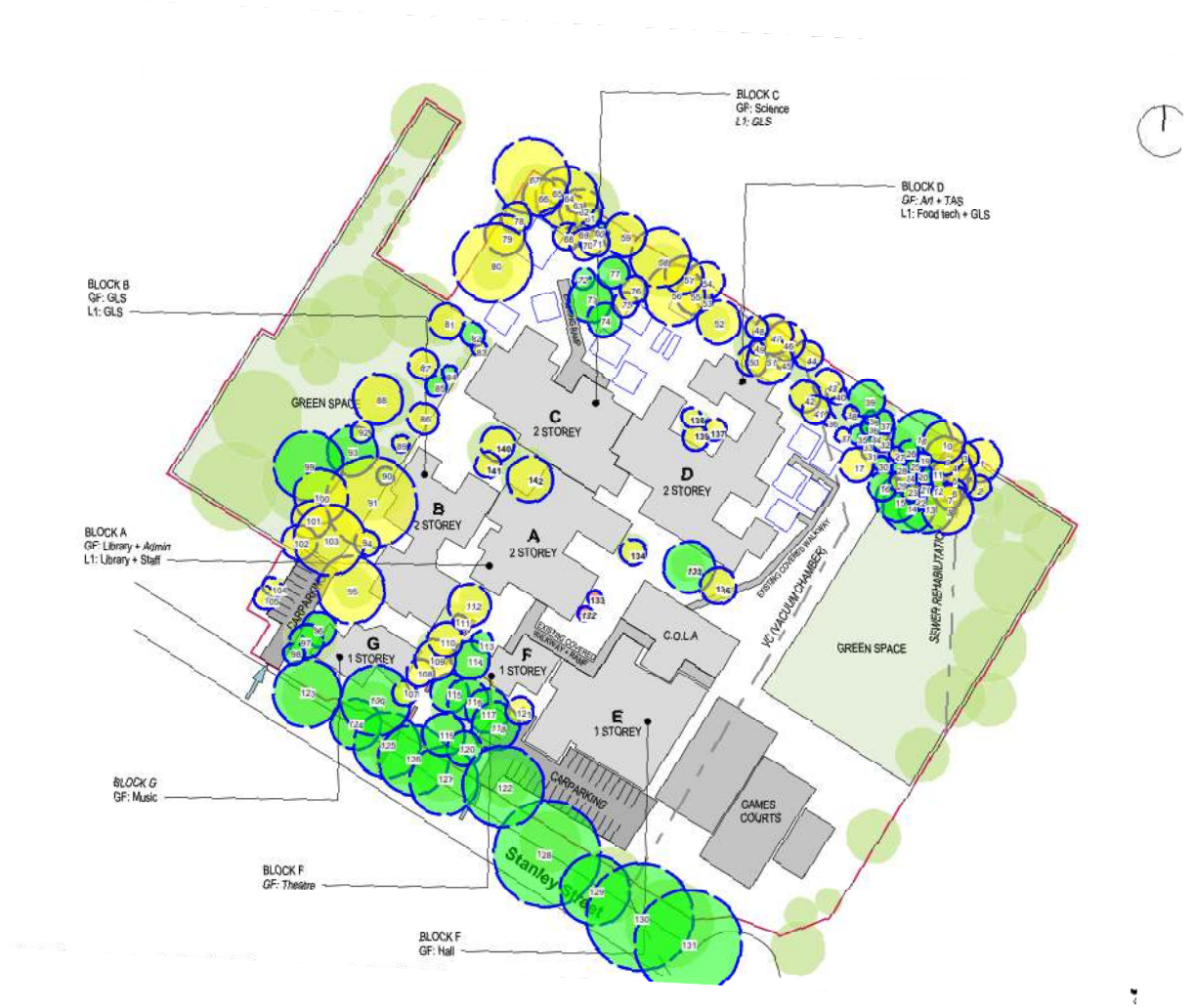

Figure 78. Tree plan showing trees with high retention value (green), medium retention value (yellow) and trees of low retention value (red), with the TPZ outlined in blue. *Source:* Bird Trees Consulting, DRG A01.

7. Archaeological resources and significance

7.1 Historical archaeological potential

Archaeological potential refers to the likelihood of a site to contain evidence of previous phases of historical occupation. Archaeological features and deposits in the form of structural remains and artefact bearing deposits are tangible evidence of previous occupation and human activities. The study area's archaeological potential is usually presented in accordance with the types of potential archaeological remains associated with features or activities that may survive at the site, a date indicating the year by which the resource is known to have been constructed and the likely extent and integrity of relics, i.e.. the predicted level of survival. The potential is expressed in accordance with the following rankings:

- Extant: archaeological remains associated with a particular historical phase or features that survive intact and have been retained in situ.
- High: it is likely that archaeological relics associated with a particular historical phase or features survive intact.
- Moderate: it is possible that some archaeological relics associated with a particular historical phase or features survive, but they may have been subject to some disturbance.
- Low: it is unlikely that archaeological relics associated with a particular historical phase or features survive.
- Nil: the degree of ground disturbance indicates that there is no potential for any significant archaeological relics to be preserved.

This section identifies where archaeological evidence is likely to be found at the site, and to what extent it may be preserved.

7.1.1 Archaeology of the neighbourhood

The study area has not previously been part of a historical archaeological assessment or investigation. The following reports have investigated areas in the vicinity of the study area and indicate varying levels of survival of archaeological features, dependant on the history of site development:

NGH Environmental 2019 'Archaeological Assessment, Concord Oval Redevelopment'

This assessment was undertaken in March 2019 for the proposed redevelopment of Concord Oval, located approximately 300m to the south of the present study area. The assessment found there to be high potential for subsurface remains associated with the c. 1793 Longbottom Stockade and consequent phases of development and occupation. Remains associated with the Stockade were assessed as potentially being of state significance, dependant on their integrity, but otherwise generally being of local significance. The report recommended that

archaeological testing be undertaken under an S139(4) excavation exception to determine if remains of the Longbottom Stockade survive in the areas identified and that geotechnical testing could only be undertaken in areas where archaeological potential has not been identified.

NGH Environmental 2019 'Historical Archaeology Post-Excavation Report, Concord Oval Redevelopment'

In May 2019 archaeological test excavation was undertaken at Concord Oval. Ten proposed geotechnical borehole locations were excavated and five areas that had been identified as areas of interest during GPR survey were also excavated. During excavation no intact cultural deposits were identified. Artefacts ranging from twentieth century to mid-nineteenth century in date were uncovered but were all located in disturbed contexts and did not provide information directly relating to identified phases of site use. Three cuts or potential post holes were identified, but it is unclear which phases these features belonged to. In conclusion, the report stated that test excavation had demonstrated significance modern historical disturbance at the site and that it is likely the vast majority of occupation deposits associated with the Longbottom Stockade were removed during the twentieth century. NGH recommended that monitoring of ground disturbance in several areas of potential should take place during construction and further testing for development in one area of the site to ensure that no archaeological remains be disturbed.

Stedinger Heritage & Archaeology 2010 'Early Graves and the Site of the Second Church, St Mary's Parish, Concord, Archaeological Excavation Report'

This report was prepared for a site approximately 650m south-west of the present study area where archaeological excavations were carried out prior to development. The investigations consisted of a machine scrape back in several areas across the site to establish the presence or absence of grave cuts. Evidence of grave cuts was observed generally at a depth of 300mm below the bitumen surface of an extant carpark. Thirteen graves were uncovered, 3 adult, 6 children and 3-4 infant. These cuts were interpreted as likely having been the result of burials between 1844 and 1867. A domed cistern, footings from the 1874 church, postholes and pits were also uncovered. The stratigraphy was observed as relatively shallow with natural-red orange clay observed at a depth of 530mm. The cemetery was assessed as being of local significance and it was recommended that the graves be left in situ and the area protected. Other archaeological features uncovered, including the church footings and cistern, were also recommended to be kept in situ as they fell outside of the proposed development footprint.

7.1.2 Phases of historical development

Based on the historical research undertaken as part of this preliminary study, the following broad post-1788 historical phases of site development were identified:

Phase 1 (1788 – 1840s): Concord Stockade and Longbottom Farm

The Concord Stockade was established in 1793, some 300 metres southeast of the current study area. From c.1819 the surrounding area around the study area became known as Longbottom Farm. By c.1835 further land was consolidated into Longbottom Farm, including the study area. It is likely that it was cleared at this time. The timber would have been cut and

sawn and taken to Sydney. Charcoal was produced on the farm and cultivation extended into the sections that were cleared, possibly including the current study area.

Archaeological evidence from this phase may include indications of land clearance and agriculture activities, such as burnt tree boles, changes in the soil profile, postholes and remnant posts associated with fence lines. There is no indication from maps or historical sources to suggest that the study area had any structures built on it during this phase.

Phase 2 (1848 – 1880): Subdivision and development

In the early 1840s the north-western portion of Longbottom Farm, including the study area, was subdivided. In 1848, the study area was granted to John Walker. There is no evidence to suggest that Walker developed the grant and it is likely that he continued to use the area for agricultural purposes. His ownership of the study area was short lived though, and the property was further subdivided and sold in 1849. Between 1849 and 1867 the properties making up the study area passed through several owners. During this time several structures were built within the north-eastern allotment of the study are. These buildings included a tannery, containing twelve pits, and three brick cottages with outhouses.

While the exact location of the tannery and cottages is unknown, historical records indicate that they were most likely constructed in the north-eastern quarter of the study area (Lot 1 DP60167). Archaeological evidence from this phase may include structural elements such as brick footings, occupation deposits associated with use of the cottages, and remains associated with the tanning pits. Evidence relating to the tanning pits could include cut and fill events, wood lined pits and pipes. Other subsurface features such as cesspits, wells and cisterns may also be present from this period.

Phase 3 (1880 - 1970) Farleigh Nettheim & Co Tannery

In 1880, the study area was purchased by Cossman Nettheim and John Farleigh. They too planned to operate a tannery. Historical records indicate that the tanning pits and several sheds from Phase 2 (1848-1880) were present in c.1880, before being demolished to make way for the new tannery. The new tannery was described as consisting of tanning pits lined with hardwood, plugged with white clay and fed by wooden underground pipes. It was constructed in the central portion of the study area, leaving much of the eastern side of the study area undeveloped. The western side of the study area became a green space with trees and shrubs planted during this phase. By 1930, the tannery consisted of a complex of structures, primarily located in the south-eastern quarter of the study area.

Archaeological remains from this phase may include structural remains associated with the tannery buildings (such as footings), underground services and the remains of tanning pits. Evidence of tanning pits could consist of cut and fill events, wood lined tanning pits and pipes. A house facing Stanley Street also remained extant during this phase. Structural remains associated with the house may include brick and stone footings, occupation deposits and cesspits.

Phase 4 (1971 – present) Concord High School

During Phase 4 the study area was sold to the New South Wales Government with the intent of establishing a school. The sale was made in 1970 and the tannery was demolished soon after.

Construction for Concord High School began in 1978. Records indicate that the construction was delayed due to the presence of concrete slabs, columns and vats associated with the use of the site for the tannery. These elements were removed to allow construction to continue. The school complex underwent few changes between its opening in 1980 and the present day. A courtyard structure was built to the west of the playing field between 2005 and 2009, and demountables were installed on brick supports on the northern and north-western side of the study area between 2016 and 2022.

The buildings from Phase 4 remain extant today and as such have no archaeological value. Figure 79 below shows the footprints of the Phase 3 Tannery (1880-1970) and Phase 4 (1970-present) Concord High School.

7.1.3 Summary of historical archaeological potential

The study area has moderate potential to contain archaeological remains associated with the occupation and development of the site in Phases 2 (1848-1880) and 3 (1880-1970). Archaeological investigations in the vicinity of the study area have indicated that archaeological remains and historic soil profiles may survive in areas that have had relatively low levels of modern disturbance. Subsurface features, such as wells, cesspits, tanks and cellars would have a higher chance of survival. In the case of the study area, no basements have been excavated in association with the extant buildings.

Considering the development history of the study area, there is nil-low potential for archaeological remains associated with Phase 1 (1788-1840s) of occupation of the study area. Physical features associated with activities on the site at this time would have been ephemeral in nature and are therefore unlikely to have survived subsequent phases of development.

Phase 2 (1848-1880) has low to moderate potential for survival of features associated with the first tannery and cottage buildings on the site, thought to have been located in the north-eastern quarter of the study area (Lot 1 DP60167). Structural evidence, such as brick footings and occupation deposits associated with the cottages has low potential to survive as these remains may have been impacted by subsequent phases of development. Remains associated with the tanning pits have moderate potential to survive as these features are subsurface and are less likely to have been significantly impacted by subsequent phases of development. The extant school buildings in this area are principally demountable structures and covered pathways, as such there is minimal ground disturbance associated with their construction. There is no evidence of further development in other areas of the study area at this time. Physical features associated with any activities taking place outside the north-eastern quarter of the study area are likely to have been ephemeral in nature and therefore unlikely to survive.

Phase 3 (1880-1970) has moderate potential for the survival of structural remains associated with the Farleigh Nettheim & Co Tannery buildings and activities on the eastern side of the study aera. Historic records indicate that elements of the tannery, including vats and concrete slabs, were removed during construction of the school. The areas of the tannery within the extant school buildings' footprints have therefore been assessed as having low potential for remains associated with the Tannery. Areas outside of the footprints of the extant school structures, including the present-day location of the basketball courts, carpark and garden area, have not

been extensively developed and as such were assessed to have moderate potential for archaeological remains associated with the Tannery to survive. Potential remains may include structural features, such as brick and concrete footings, timber and/or concrete tanning pits, service pipes, and possible artefact deposits associated with the use of the site by the people who worked there.

Development associated with Phase 4 (1970-present) remains extant and is therefore not archaeological in nature.

Figure 80 provides a graphic representation of the historical archaeological potential at the study area.

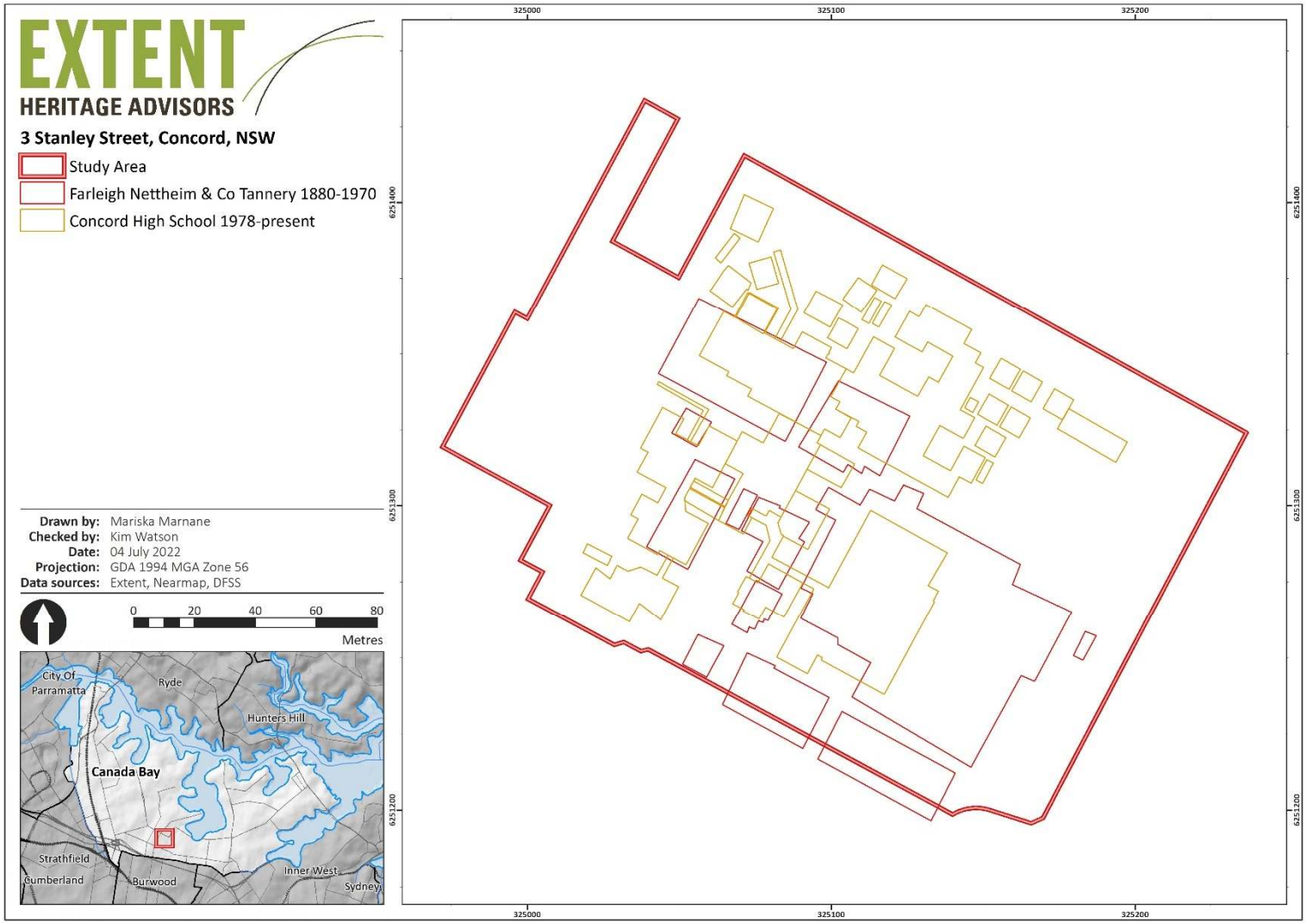

Figure 79. Footprints of structures based off historical aerials from Phase 3, Farleigh Nettheim & Co Tannery, and Phase 4, Concord High School.

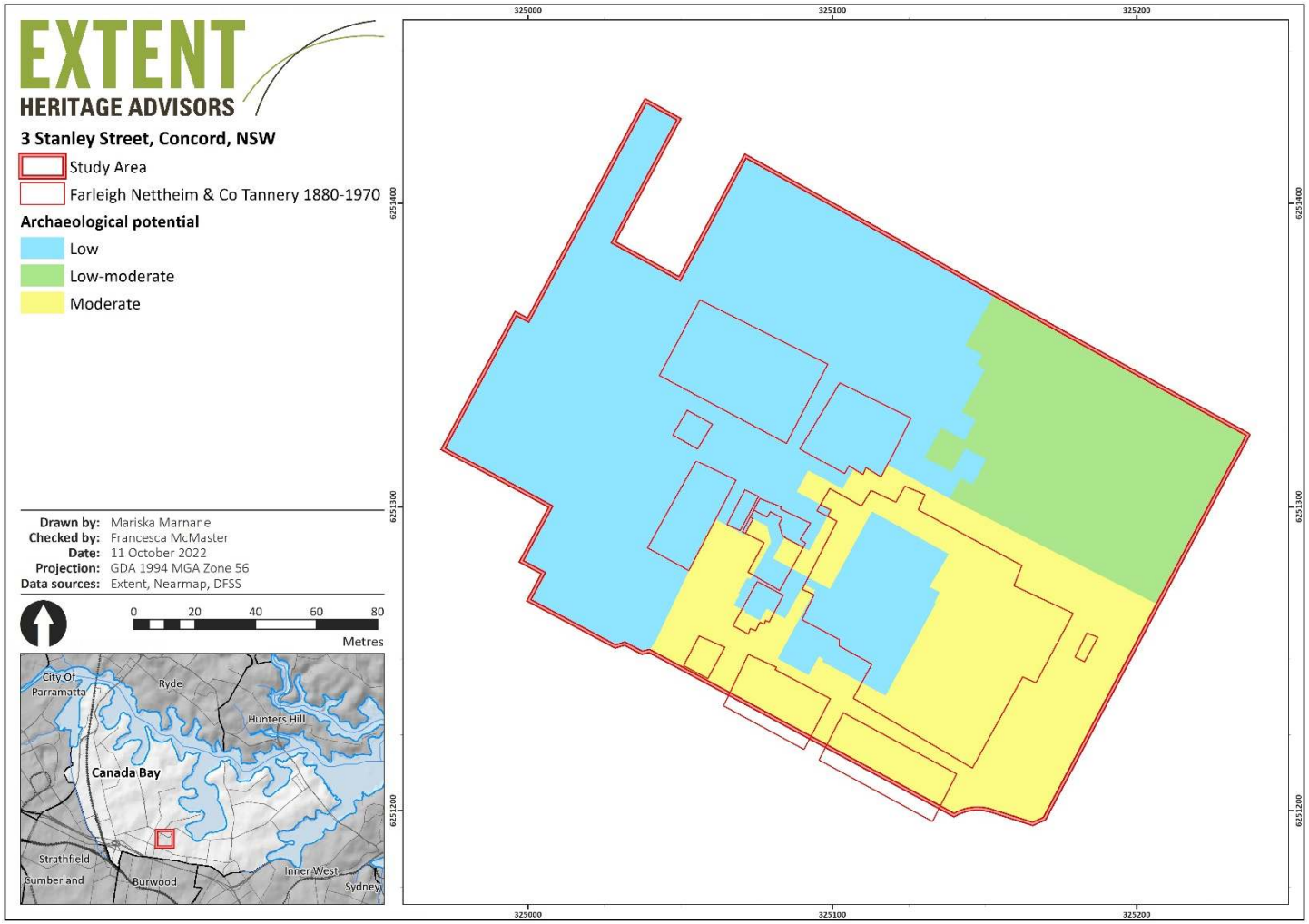

Figure 80. Graphic representation of the areas of archaeological potential across the study area and the footprint of the structures from Phase 3, Farleigh Nettheim & Co Tannery.

7.2 Archaeological significance

Archaeological significance refers to the heritage significance of known or potential archaeological remains. While they remain an integral component of the overall significance of a place, it is necessary to assess the archaeological resources of a site independently from above-ground heritage elements. Assessment of archaeological significance is more challenging as the extent and nature of the archaeological features is often unknown and judgment is usually formulated on the basis of expected or potential attributes.

To facilitate the significance assessment of historical archaeological remains, the Heritage Branch, Department of Planning NSW (now Heritage NSW, DPC) prepared a set of criteria in the publication Assessing Significance for Historical Archaeological Sites and 'Relics' (December 2009). The NSW heritage criteria outlined in Section 6 are grouped to assist assessing significance related to archaeological sites and relics.

7.2.1 Archaeological research potential (NSW Heritage Criterion E)

As there is nil-low potential for archaeological evidence associated with Phase 1 (1788-1840s) to survive, there is no significance under this criterion for this period.

Archaeological evidence associated with structural remains and occupation deposits associated with Phase 2 (1848-1880) cottages and tannery may provide information about the development of the area in this period, including the development of early industry in Concord. This information could enhance our knowledge of nineteenth-century development and industry in the area. Substantial intact archaeological evidence associated with Phase 2 (1848-1880) would be of local significance under this criterion.

Archaeological evidence relating to the development and operation of the Farleigh Nettheim & Co Tannery during Phase 3 (1880-1970) would have research potential for its capacity to inform our understanding of the development of Tannery, including the layout and construction of the buildings and how the earlier tannery infrastructure may have been incorporated into the 1880 development. Evidence from this phase could also provide evidence relating to the lives and experiences of those who worked at the facility and the conditions under which they worked. Archaeological evidence associated with Phase 3 (1880-1970), particularly artefactual evidence, would be of local significance under this criterion.

7.2.2 Association with individuals, events or groups of historical importance (NSW Heritage Criteria A, B & D)

As there is nil-low potential for archaeological evidence associated with Phase 1 (1788-1840s) to survive, there is no significance under this criterion relating to this period.

Archaeological evidence associated with Phase 2 (1848-1880) of development at the study area has association with several different individuals who owned and possibly developed the property. It is unlikely that specific evidence relating to individuals or families will be able to identified from any remains. Archaeological evidence associated with the occupation of the site

during Phase 2 (1848-1880) would be unlikely to meet the threshold for significance under this criterion.

Phase 3 (1880-1970) development of the study area is associated with businessmen Cossman Nettheim and John Farleigh. It is unlikely that specific evidence relating to these two individuals will be able to be identified from any remains. However, archaeological remains associated with Phase 3 would also have association with the workers who ran the Farleigh Nettheim & Co Tannery. Evidence associated with this group may be present in the form of artefactual evidence. Should such evidence be present, it would be of local significance under this criterion.

No further significant associations were identified within the study area. The remainder of the identified archaeological resource is unlikely to meet the threshold for significance under this criterion.

7.2.3 Aesthetic or technical significance (NSW Heritage Criterion C)

As there is nil-low potential for archaeological evidence associated with Phase 1 (1788-1840s) to survive, there is no significance under this criterion from this period.

Prior to excavation, it is difficult to determine if archaeological remains would meet this criterion as the level of preservation is unknown. It is not possible to assess this criterion fully with regard to aesthetic characteristics prior to excavation occurring but remains are unlikely to meet this criterion.

In regard to technical significance, archaeological evidence of the tannery structures from both Phases 2 (1848-1880) and 3 (1880-1970) may include remains of technical components of the tannery buildings which could contribute to our understanding of the technical design of the plant. However, such technical information is readily available in the historical resource and as such may not provide additional information. Should archaeological remains associated with the technical tannery infrastructure from Phases 2 and 3 be uncovered and be of high integrity, they would be of local significance under this criterion.

7.2.4 Ability to demonstrate the past through archaeological remains (NSW Heritage Criteria A, C, F &G)

As there is nil-low potential for archaeological evidence associated with Phase 1 (1788-1840s) to survive, there is no significance under this criterion for this period.

The potential archaeological resource of the study area may contribute to our understanding of the development of industry in the area during the nineteenth and twentieth century. Key questions could relate to the integration of the Phase 2 (1848-1880) tannery infrastructure into the Phase 3 (1880-1970) tannery buildings. If substantial intact remains survive related to these phases they would be of local significance under this criterion.

7.2.5 Bickford and Sullivan's questions

The above assessment criteria are supplemented by the established assessment framework that has been developed by Anne Bickford and Sharon Sullivan (1984), who set three

fundamental questions to assist in determining the research potential of an archaeological site. These questions are as follows:

7.2.5.1 Can the site contribute knowledge that no other resource can?

Archaeological remains associated with the tannery and cottage buildings from Phase 2 (1848-1880) have the potential to provide information on the development and use of the site not available in the historic records.

Archaeological evidence from the Farleigh Nettheim & Co Tannery developed in Phase 3 (1880-1970) may provide insight into how the tannery was built and operated, as well as how the Phase 2 tannery structures were integrated into the new development.

7.2.5.2 Can the site contribute knowledge that no other site can?

Information concerning the development of the Phase 2 and Phase 3 tannery buildings would be unique to site. However, information relating to the development of tannery structures generally would not be unique in NSW as this information is documented in written record and has been previously identified at other sites.

7.2.5.3 Is this knowledge relevant to general questions about human history or other substantive questions relating to Australian history, or does it contribute to other major research questions?

It is unlikely that the potential archaeological evidence at the study area would have the ability to contribute significant additional information about the early settlement of the Concord area, or Sydney more generally.

7.2.6 Summary statement of archaeological significance

There is nil-low potential for archaeological remains from Phase 1 (1788-1840s) to survive.

Structural and occupational deposits associated with the Phase 2 (1848-1880) period of use have the potential to enhance our understanding of the development of the study area and the establishment of industry in the Concord area more generally. Archaeological evidence associated with this phase of use would be of local significance for its historical and research values.

Archaeological evidence associated with Phase 3 (1880-1970) may provide insight into the development and use of the Farleigh Netteheim & Co Tannery including possible insight into those who worked there and conditions under which they worked. Intact archaeological remains from Phase 3, particularly occupation deposits, may be of local significance for historical and research values.

8. Proposed works

8.1 Rationale

Concord High School is located within the Sydney Olympic Park Catchment Area and was identified as requiring an expansion to meet the current and future enrolment demand. Concord High School has a proposed student increase from 1,738 students in 2021 to 2,866 students by 2035 (SINSW 2019, 13).

The proposed masterplan for the redevelopment of Concord High School identifies the new and updated faculties required to support the growth in student numbers. The design for the new facilities and spaces is based on the learning mode Typology D to provide activated, flexible learning hubs. Typology D learning hubs are conducive to greater flexibility and offer greater scope for teacher and student collaboration. The design will comply with the new Modern Methods of Construction (MMC) hub layout design standards (School Learning Environments and Change 2022, 18-19).

The 100% Schematic Design was informed by a series of design options, presented within the masterplan. Option 4 was the preferred and therefore was developed further during the Concept Design stage. This design was then updated for the 100% Schematic Design stage.

8.2 Outline

The 100% Schematic Design, as shown on drawings prepared by JDH Architects and dated 6 April 2023, includes:

- The demolition of several existing structures, including (refer Figure 82):
  - Block E;
  - The Covered Outdoor Learning Area (COLA); and
  - All demountable structures.
- The removal of landscape elements including (refer Figure 82):
  - The existing carpark south of Block E;
  - The three sports courts east of Block E;
  - The removal of the covered walkway connecting Block F to Block A;
  - The removal of trees across the site, including groupings at the north-east, south-east and south-west.

The 100% Schematic Design consists of the construction of three new, interconnected buildings of two to four storeys arranged in an ‘L’ shaped footprint along the southern boundary with Stanley Street (refer Figure 81 to Figure 89):

- Block Z consisting of a four storey structure accommodating administrative, visual arts and general learning spaces;
- Block Y consisting of a three storey structure accommodating canteen, general learning spaces, sports and performance spaces;
- Block X consisting of a two-storey hall structure accommodating sports and performance spaces;
- The three new blocks will require a piled foundation to rock. Due to the fall of the current ground level, two options for construction Block X are being considered; Option 1, importing fill to act as formwork or Option 2, construction strip footings on pile foundations at the existing ground level. Both methods will require pile foundations. The piers will range in diameter from 400mm to 900mm diameter and would be installed across the footprints of the new blocks at regular intervals. The ground floor slabs will be typically 150mm thick.
- New sewer, stormwater and other service trenches will be required across the site to facilitate the new structures;
- Additionally it is noted that the geotechnical report for the site (CMW Geosciences, 2022) has recommended the removal of fill on the site, from a depth of 0.1m to 4.5m;
- The extension of the western car park;
- The implementation of an overarching landscape strategy introducing new ornamental planting, contemporary landscaping, paved open spaces, pathways, and seating.

Figure 81. Proposed site plan with new blocks and extended carpark on south-west side. *Source*: JDH Architects.

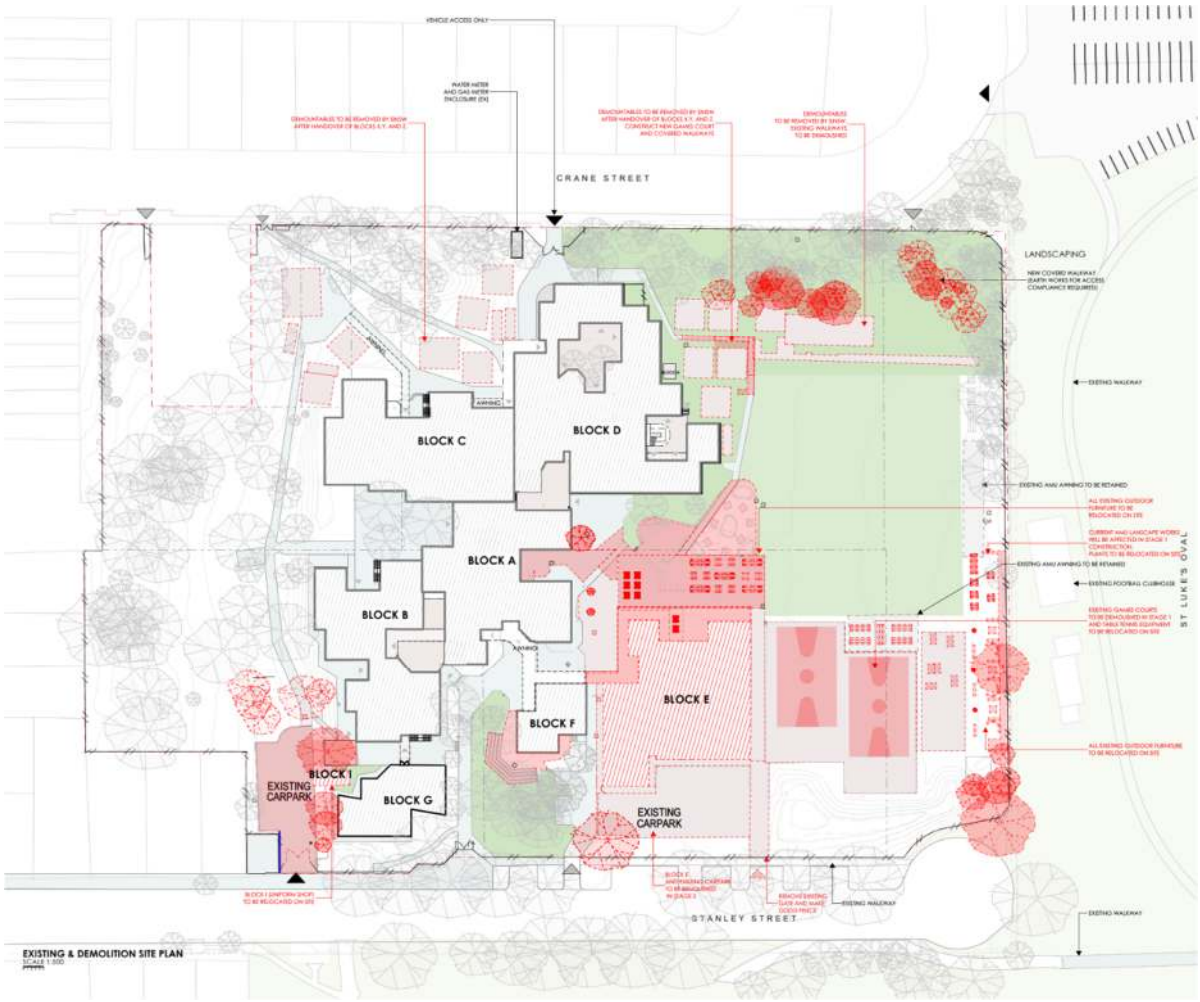

Figure 82. Demolition plan of the existing buildings, structures, and landscape elements at Concord High School. *Source*: JDC Architects 2023.

Figure 83. Schematic Design Perspective 1, as the proposed buildings would appear from Stanley Street. *Source*: JDC Architects 2023.

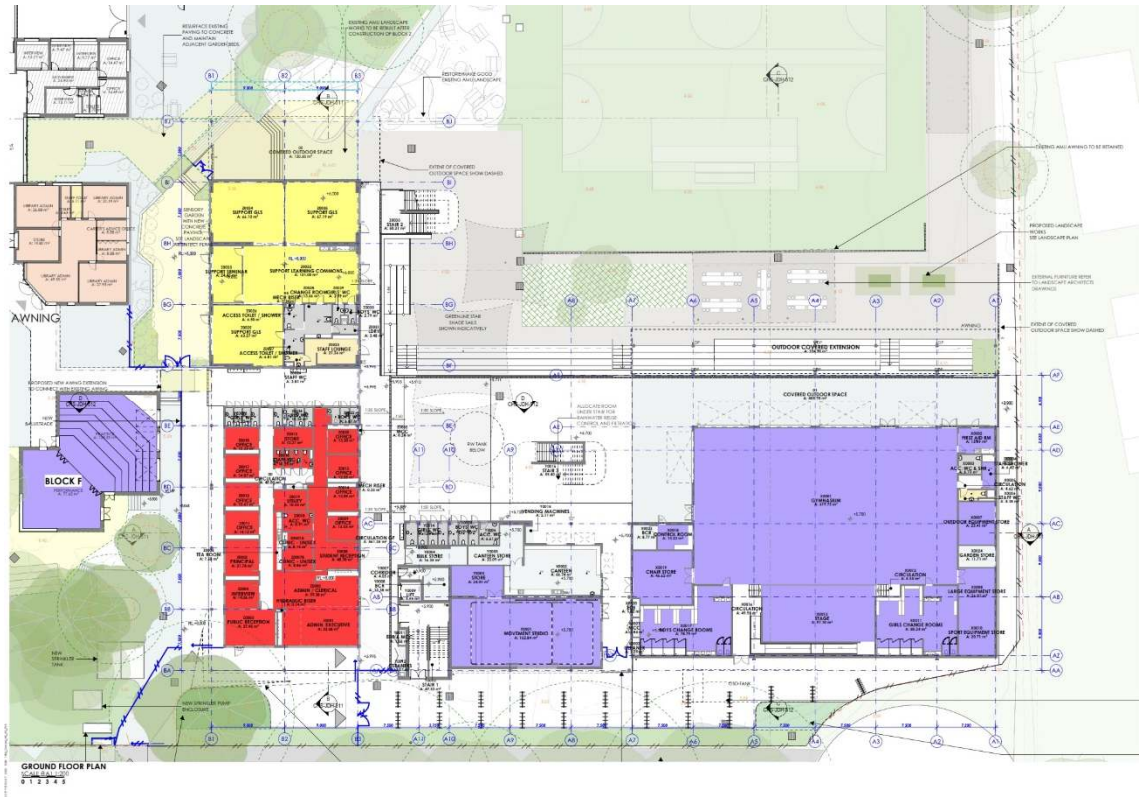

Figure 84. Ground floor plan. *Source*: JDC Architects 2023.

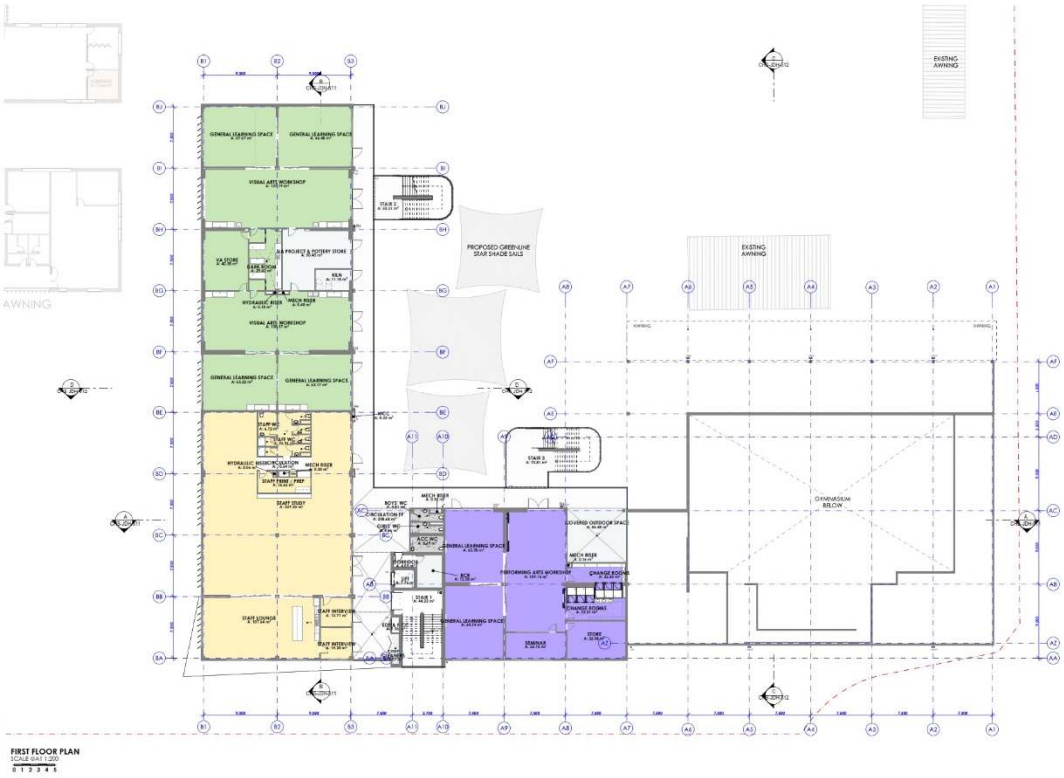

Figure 85. First floor plan. *Source*: JDC Architects 2023.

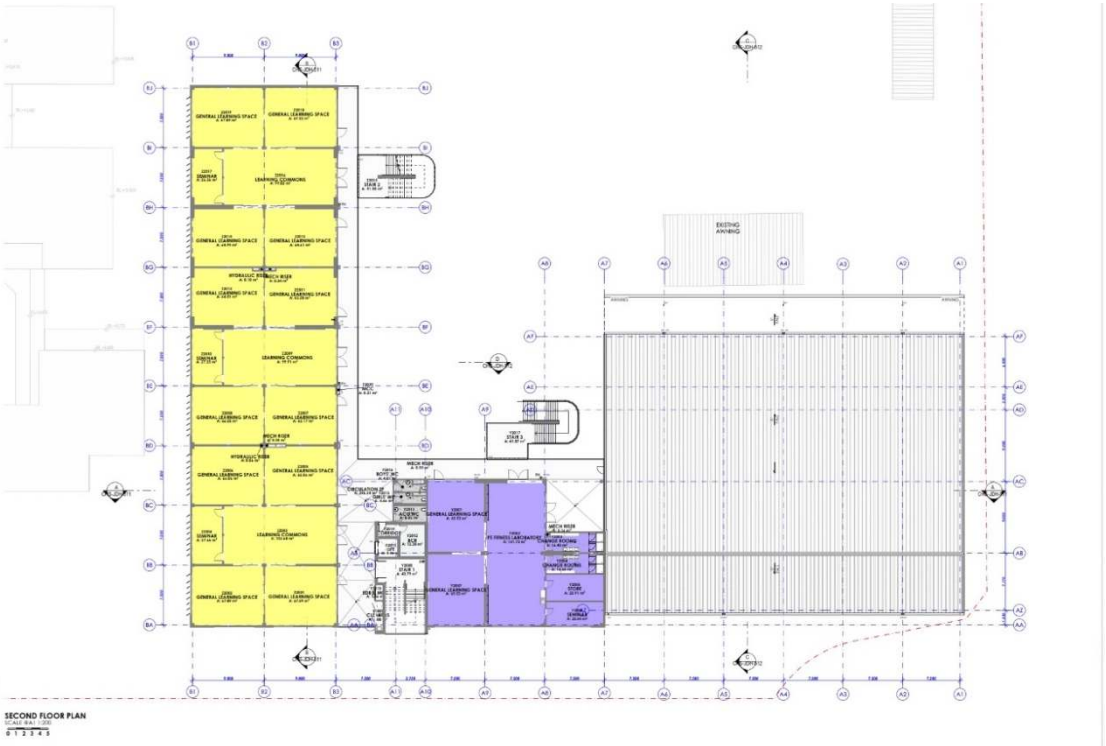

Figure 86. Second floor plan. *Source*: JDC Architects 2023.

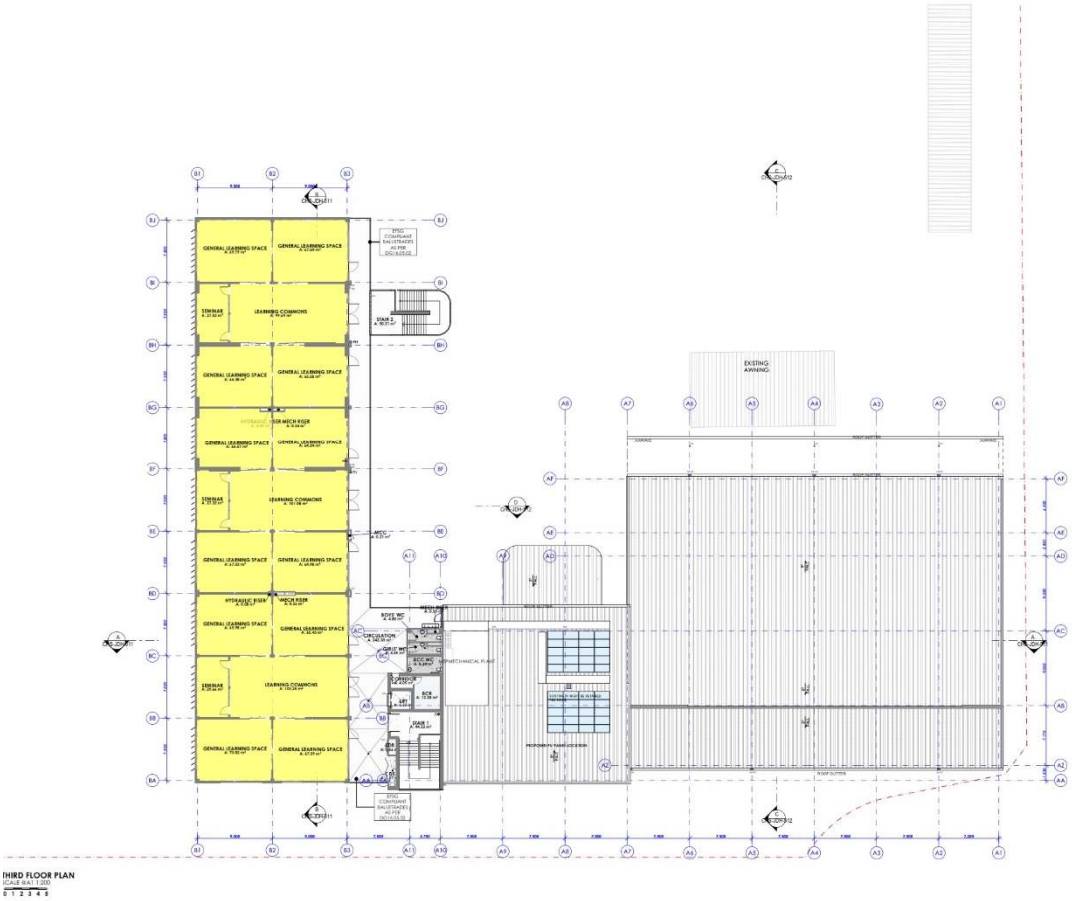

Figure 87. Third floor plan. *Source*: JDC Architects 2022.

Figure 88. Indicative elevations of the south and west elevations, not to scale. *Source*: JDC Architects 2023.

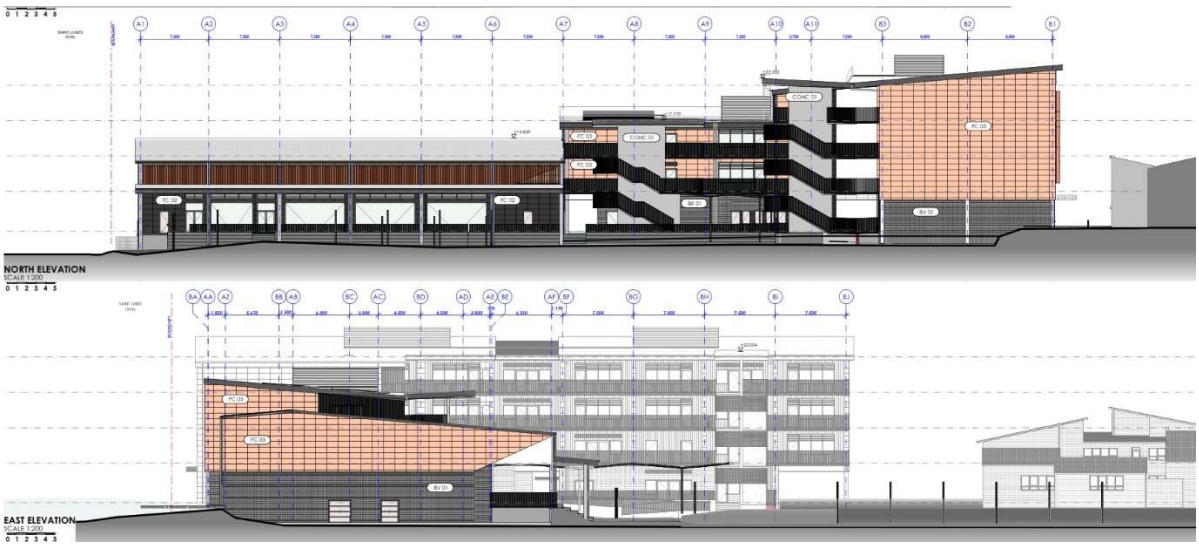

Figure 89. Indicative elevations of the north and east elevations, not to scale. *Source*: JDC Architects 2023.

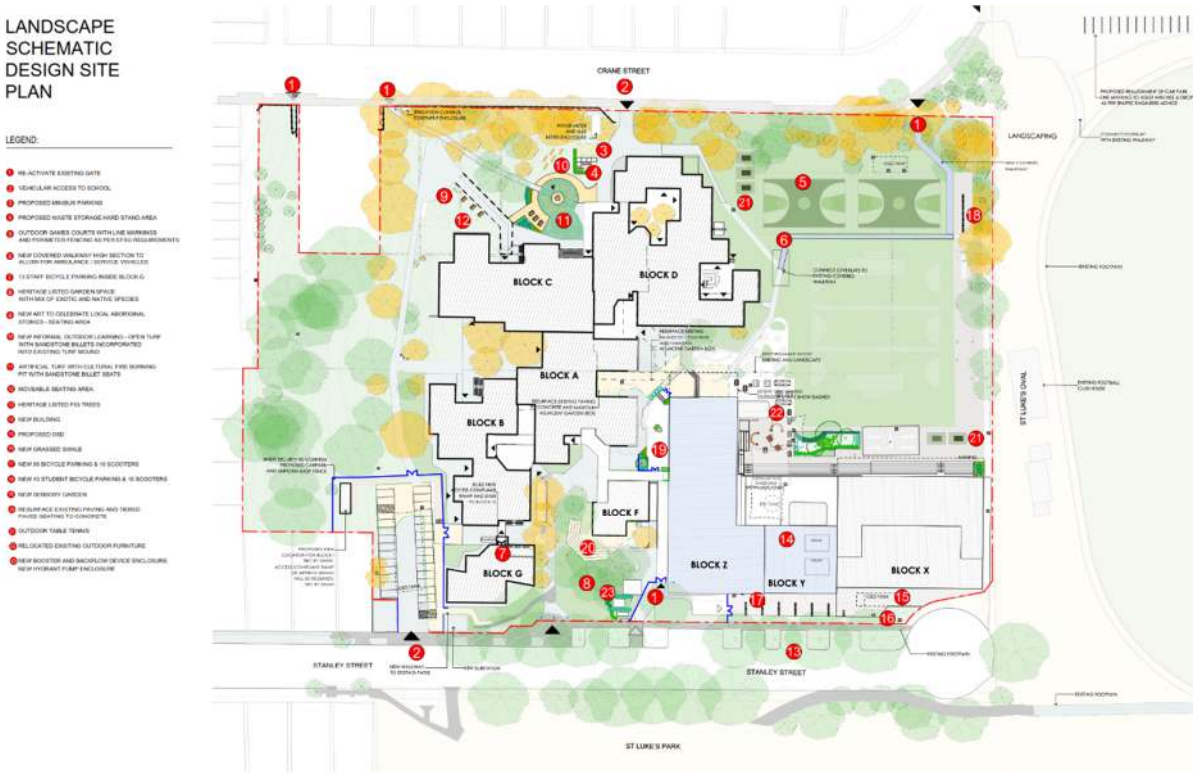

Figure 90. Landscape Schematic Design Site Plan. *Source:* Space Landscape Design, 2023.

Figure 91. Landscape Schematic Design, Informal Outdoor Learning Area Detail. *Source:* Space Landscape Design, 2023.

Figure 92. Landscape Schematic Planting Plan, Informal Outdoor Learning Area. *Source*: Space Landscape Design, 2023.

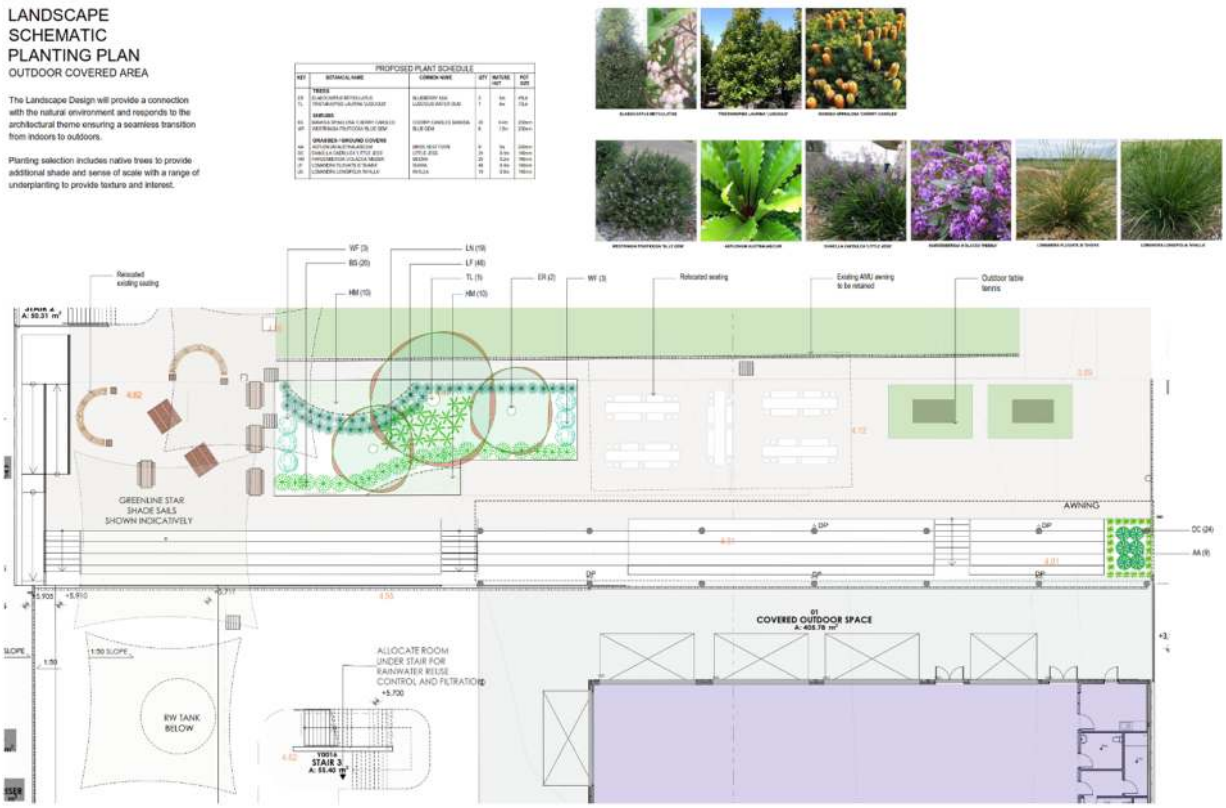

Figure 93. Landscape Schematic Planting Plan, Outdoor Covered Area. *Source:* Space Landscape Design, 2023.

Figure 94. Landscape Schematic Planting Plan, Sensory Garden. *Source:* Space Landscape Design, 2023.

9. Assessment of heritage impact

The assessment of the degree of impacts made in this report has been based on the ICOMOS *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties* (2011). While the guideline was prepared for the Heritage Impact Assessment to evaluate the impact of developments on the outstanding universal value (OUV) of World Heritage properties, the definitions and evaluation matrix can be applied to the values of any heritage significant place. Appendix 3B of the ICOMOS guideline provides an example guide for assessing magnitude of impact to built heritage and historic urban landscapes. The definitions for gradings of impact specific to this project and the study area are taken from this guideline and are outlined in the below table.

Table 3. Impact gradings (ICOMOS 2011).

Impact grading	Built heritage or Historic Urban Landscape attributes
Major	Changes to key historic building elements that contribute to OUV, such that the resource is totally altered. Comprehensive changes to the setting.
Moderate	Changes to many key historic building elements, such that the resource is significantly modified. Changes to the setting of an historic building, such that it is significantly modified.
Minor	Change to key historic building elements, such that the asset is slightly different. Change to setting of an historic building, such that it is noticeably changed.
Negligible	Slight changes to historic building elements or setting that hardly affect it.
No change	No change to fabric or setting.

9.1 Built and landscape heritage

Concord High School is a locally listed landscape heritage item on Schedule 5 of the Canada Bay LEP 2013 and the Department of Education Section 170 Heritage and Conservation Register. The landscape has historical significance for its conservation of landscape elements associated with the Farleigh Nettheim tannery, which operated on the site from the late 1890s to 1967. The landscape is also historically associated with the development of Concord High School in the late 1970s, conserving a collection of modern education institutional buildings and landscape features designed by Government Architect, Charles Weatherburn.

The aesthetic values of the site are primarily attributed to the landscape elements comprising of cultural plantings dated to the late 1930s, and planned landscape features dated to the school's construction in the late 1970s. The school buildings and landscape features reflect a shift in in educational concepts and school design of the time and are representative of the standard designs and policies employed by the Government Architect's Branch in the 1970s. These values are enhanced by the relationship between the built form and landscape setting, designed to ensure the buildings harmonised with the environment.

The Preliminary Heritage Assessment established that Blocks A to G comprise of the original configuration of Concord High School built in 1970s. The site arrangement demonstrates a standard school plan adopted in the mid to late 1970s by the Government Architects known as 1975 Secondary School Brief. Concord High School demonstrates architectural influences of the 'Sydney School' architectural style in the post war period. The buildings make a moderate contribution to the landscape heritage values of the site.

The proposed 100% Schematic Design of Concord High School seeks to increase student capacity and improve amenity through the demolition of all demountable building across the site and construction of three new buildings along Stanley Street. The 100% Schematic Design will arrange the three new buildings in an L-shape layout along Stanley Street, replacing the existing Block E and F. The new buildings will include a new two-storey hall (Block X) with an attached three-storey structure accommodating general learning, sports and performance spaces (Block Y), and a four-storey structure accommodating the administrative, visual arts and general learning spaces (Block Z).

The 100% Schematic Design will have an impact on the following elements within the site:

- Demountable buildings,
- Block E,
- COLA
- Crane Street and Stanley Street boundary trees,
- Existing carpark south of Block E
- Existing sports courts east of Block E, and
- Limited garden beds.

Built Form

The 100% Schematic Design requires the demolition of all demountable buildings and Block E for the construction of a new school building. The demolition of all demountable buildings on site represents a positive heritage outcome through the removal of elements that are intrusive to the heritage significance of the site. This action will serve to strengthen the heritage item's relationship between its built form and landscape setting.

The 100% Schematic Design will alter the built form through the removal of one block that forms a part of the original site arrangement and layout. While its removal will have a major irreversible impact on buildings assessed as having moderate heritage significance, this will not adversely impact upon the wider landscape heritage values of the site. The 100% Schematic Design will retain a significant portion of the school layout, including Blocks A, B, C, D, F and G and key landscape features. By removing a building on the periphery and redeveloping land along Stanley Street the 100% Schematic Design serves to maintain a cohesive landscape with minimal impact to areas of key significance, such as cultural plantings associated with Farleigh Nettheim tannery. Based on the assessment outlined above, the removal of these building is

assessed as having a minor adverse impact on the heritage significance of Concord High School.

The 100% Schematic Design has made a considered effort to reduce and mitigate the visual impact through the consideration of character, scale, form, siting, materials, colour, and detailing. The 100% Schematic Design compliments the existing built environment and surrounding vegetation by employing a similar design language. This is expressed through the proposed material palette and use of louvres which responds to the verticality of architectural elements on existing buildings and surrounding vegetation. Similarly, the roof form of the new building compliments the existing character. This, paired with the use of vertical façade treatment, represents a neat, well-designed contemporary building. The simple form and warm neutral tones employed will form a recessive presence in the landscape.

While the scale will be substantially larger than the existing buildings, increasing the built form from two to four storeys, the design has responded to the topography of the landscape. The buildings will step down in height, following the slope in the topography and reducing the overall mass and scale of the new buildings. It is considered that while the new buildings will constitute a moderate change to the existing layout of the school, the use of similar forms and architectural influence will ensure that they comprise sensitive and sympathetic additions to the site.

Overall, these works area assessed as having a minor impact on the significance of the school, this is considered appropriate given they intend to provide additional learning space necessary for the amenity of staff and students.

Landscaping

In order to realise the objectives of the proposed development of Concord High School, the proposed works will require the removal of multiple trees from the campus.

This includes localised groups of trees at the north-east, south-east and southern boundaries of the campus, as well as isolated trees in the centre of the campus. The proposed trees to be removed consist of mature trees that form part of the c.1970s cultural plantings associated with the early construction and development of Concord High School.

The extension of the western carpark will involve the removal of several mature trees in the area of the former Farleigh Nettheim tannery. The trees to be removed have been identified as of high or medium retention value in the Aboricultural Assessment prepared by Birds Trees Consultancy. It is not known which trees in this portion of the site relate to the c.1930s cultural plantings associated with the former tannery; however, those along the western boundary which demonstrate the greatest height/maturity are considered to be most likely to be associated with the 1930s cultural plantings. The relative size, maturity and species of the trees to be removed suggest a later date than the trees along the western boundary. It is considered that the trees to be removed are less likely to be associated with the c.1930s cultural plantings.

The significance of Concord High School predominately lies in the designed relationship between the built form and landscape setting which together make a collective contribution to the planned landscape heritage values of the site. The proposed development will retain a significant portion of the landscaping and will allow for the continued appreciation and

interpretation of the original design intent. Tree removal is limited to areas within the construction footprint of the new building, carpark areas and relocated basketball courts.

The wider landscape values of the site will be retained and celebrated through the implementation of new landscaping elements. The landscaping vision aims to create meaningful spaces to allow for students, teachers and visitors to connect to Country. The new landscaping has been designed to complement the new buildings, providing a contemporary historical layer to the site. This is a sympathetic and appropriate response to mitigate the loss of trees and some garden beds within the construction footprint through the activation of additional passive and active spaces.

The proposed 100% Schematic Design has made a conscious effort to retain as much vegetation as possible while balancing the operational requirements, student amenity and heritage significance. This has been designed in accordance with the Burra Charter principle for a cautious approach which advocates for 'as much as necessary, as little as possible'. The landscaping is assessed as having a minor heritage impact on the heritage significance of the site. This is considered appropriate as the wider heritage values of the site will be retained, conserved, and celebrated.

9.2 Curtilage and subdivision

The proposed works are wholly contained within the Concord High School campus and will have no impact on the subject site's curtilage or subdivision.

9.3 Views and settings

The redevelopment of Concord High School represents a modest addition to the campus and the surrounding suburban setting. The proposed redevelopment will be a recognisably contemporary addition to the campus. However, the stepped massing, subtle hipped roof form, vertical louvres and materiality is considered cohesive with the existing character and setting of the site.

The works involved to recreate the entrance to the school on Crane Street will serve to create a stronger presence along this frontage, while retaining significant trees that contribute to the setting and character of the area. The removal of the demountable buildings will enhance views from the public domain and enhance the existing landscape character.

The inclusion of an additional, new main entrance to the school on Stanley Street will see a minor adjustment to the original layout and access to the site. The new entrance represents a positive change that will provide an improved entrance to the school with increased security by enabling the administrative staff unobtrusive views to the school entrance. The formal entrance of the original school will be retained.

Views of the Concord High School campus are limited from the public domain due to the setting of the school buildings that are largely screened by mature cultural plantings. This will remain relatively unchanged when viewed from Crane and Stanley Streets. While the new buildings will be of a larger scale, the architectural character of the materials, fenestration and massing will

ensure the new buildings are compatible with the wider landscape. The visual prominence of the new building from Stanley Street will remain screened by the mature *Ficus microcarpa* trees that form a dense, evergreen canopy in the public domain outside the boundaries of the school campus.

9.4 Heritage items in the vicinity

There are three (3) identified heritage items in the vicinity of the study area. They include:

- Street Trees, (I422)
- Concord Primary School and grounds, (I49)
- Street Trees, Burwood Road, (I56)

Due to the distance, topography and surrounding development separating the study area from Concord Primary School at 66 Burwood Road, and street trees along Burwood Road, the new development is considered to have no impact on these heritage items.

While the individually listed street trees along Stanley Street are in the immediate vicinity of the study area, the 100% Schematic Design will have no physical impact on the trees. The trees will be appropriately retained and conserved, and further protected from construction works with the establishment of tree protection zones in accordance with the advice of the Project Arborist. While the setting of the heritage item will be visibly changed through the construction of a new school building, this will not have an adverse visual impact street trees. They will remain highly visible within the streetscape, conserving their aesthetic and landmark values.

9.5 Historical archaeology

There are two options currently being considered for the construction of the new blocks. One involving bringing in fill to raise the ground level of the site, and the other using footings to create a level area across the footprint of the structures. For both options piling for foundations across the footprint of the new blocks will be required. The diameter of the piles varies from 400mm to 910mm. The piles will be required to go as deep as bedrock, some 4 to 10 m according to the geotechnical report. Additionally, the geotechnical report recommended the removal of fill from the site, from a depth of 0.1m to 4.5m. For carpark 1A on the south-western side of the study area, construction will require levelling involving some ground disturbance.

Carpark 1A is proposed for an area of low archaeological potential and is partially located within an area where a carpark is already located. The new blocks are proposed across an area of low to moderate archaeological potential. As such, construction of the new blocks has potential to impact archaeological remains assessed to be of local heritage significance within the footprint and any other excavation areas required for the development. Figure 95 below shows the footprint of the new blocks in relation to the Phase 3 Tannery structures and the assessed areas of potential.

The significance of the historical archaeological resources that may still survive at the site are primarily based on research potential and the ability of deposits to provide additional information

on the story of the site. The adverse impact of the proposed development could be mitigated by appropriate archaeological investigation and recording to realise the research potential of the archaeological resource.

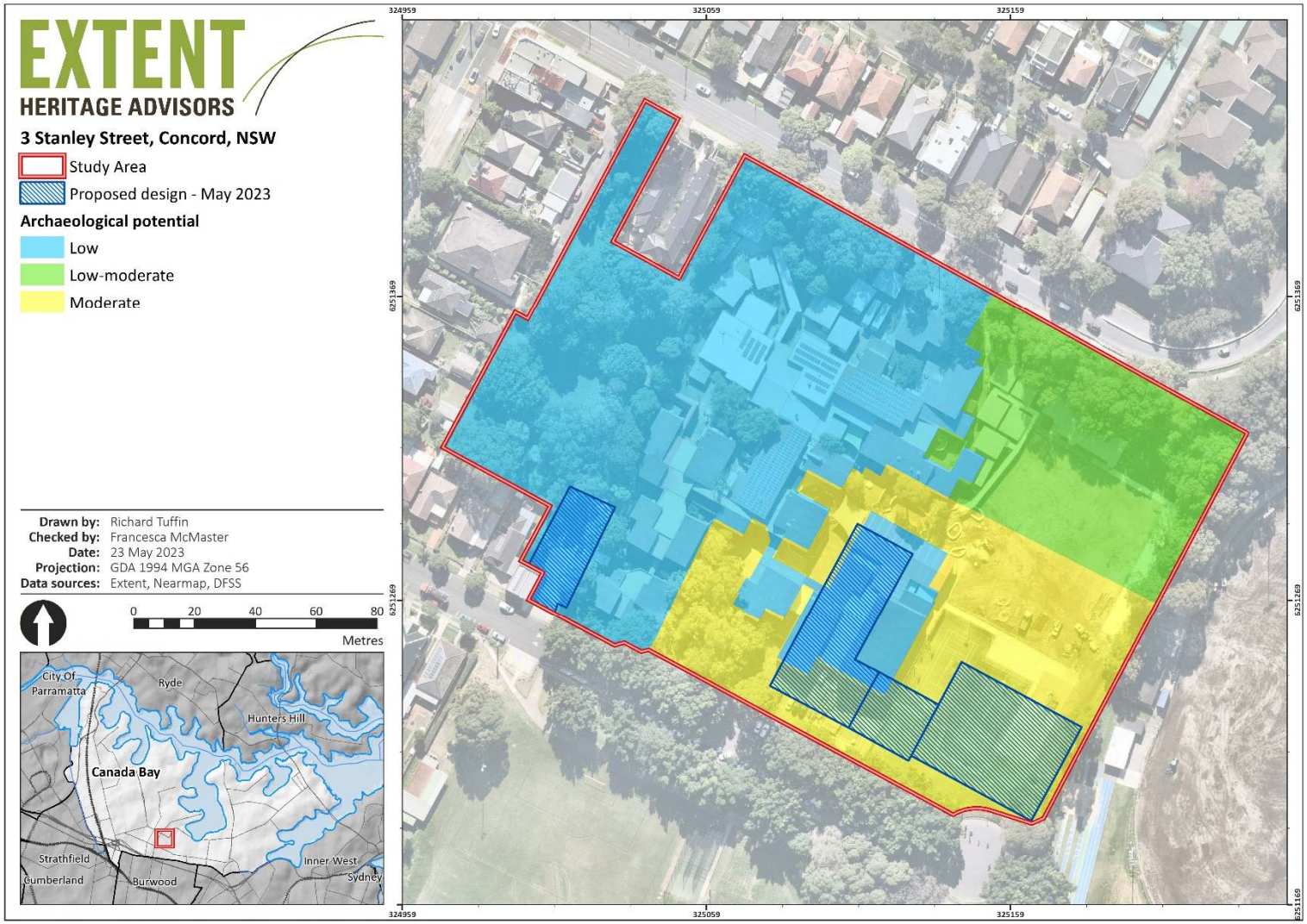

Figure 95. Overlay of Schematic Design impacts shown in relation to the assessed areas of archaeological potential.

10. Statutory controls

10.1 Heritage Act 1977 (NSW)

The *Heritage Act 1977* provides protection for items of State heritage significance that are listed on the State Heritage Register (SHR), as well as for unlisted archaeological relics. Works proposed for items protected by the Heritage Act 1977 must be approved by the Heritage Council of NSW or its delegates, as appropriate.

Relics' Provision

Historical archaeological remains are afforded automatic statutory protection by the 'relics' provision of the Heritage Act. The Heritage Act defines a 'relic' as any deposit, object or material evidence:

a. that relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement; and

b. that is of State or local heritage significance.

Section 139[1] of the Heritage Act states that:

> A person must not disturb or excavate any land knowing or having reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed unless the disturbance or excavation is carried out in accordance with an excavation permit.

Section 170

Section 170 of the Act requires a government agency establishes and maintains a Heritage and Conservation Register which lists items of environmental heritage that s owned and occupied by that statutory body. As the site is listed as an item of local heritage significance on the Department of Education Heritage and Conservation Register, it's future management must be in accordance with the provisions set in Section 170 of the Act.

Section 170A of the Act requires a government agency to provide 14 days written notification to the NSW Heritage Council when it undertakes the following activities:

a. Removes any item from its register under section 170, or

b. Transfers ownership of any item entered in its register, or

c. Ceases to occupy or demolish any place, building, or work entered in its register.

Extent Heritage comment

This SOHI has outlined the significance of the buildings and assessed the heritage impact of the proposed works. This report may accompany the written notification to the NSW Heritage Council,

notifying of the intention to demolish part of Concord High School, which is listed as an item of local heritage significance on the Department of Education Heritage and Conservation Register.

As the site has been assessed to have potential to contain archaeological remains of local significance, appropriate mitigation methods to protect the potential archaeological remains must be taken prior to ground disturbance taking place as detailed in the recommendations section of this SOHI.

No other provisions of the Act are applicable to the site.

10.2 Environmental Planning and Assessment Act 1979

Environmental planning instruments made under the Environmental Planning and Assessment Act 1979 (NSW) (EPA Act) include state environment planning policies (SEPPs), that deal with matters of state or regional environmental planning significance, and local environmental plans (LEPs), that guide planning decisions for local government areas. The relevant environmental planning instrument is the Canada Bay Local Environmental Plan 2013 (Canada Bay LEP 2013).

For environmental assessment purposes under Part 5 Division 5.1 of the NSW Environmental Planning and Assessment Act 1979, Section 5.5 of the Act requires that a determining authority: "examine and take into account to the fullest extent possible all matters affecting or likely to affect the environment" with respect to the proposed works. The specific requirements of what must be contained in an environmental assessment are set out in Schedule 2 of the Environmental Planning and Assessment Regulations 2000. Heritage matters fall within the scope of 'environment' in relation to this Act.

Extent Heritage comment

This Statement of Heritage Impact fulfills the requirements of environmental assessment with regard to heritage in accordance with Section 5.5 of the Act.

10.3 Canada Bay Local Environmental Plan 2013

Clause 5.10 of the Canada Bay LEP 2013 applies to heritage conservation and 5.10(4) requires, among other things, that before granting consent under the clause, Council must assess the effect of a proposed development on the heritage significance of the item or conservation area concerned. Clause 10(5) specifies that Council, before granting consent, may 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, heritage conservation area or item in the vicinity of heritage item or conservation area.

Extent Heritage comment

This Statement of Heritage Impact fulfils the requirements of Clause 5.10 of the LEP. The proposed works are assessed as having a minor impact on the heritage significance of the site.

10.4 Canada Bay Development Control Plan 2013

The DCP provides a unified set of controls that provides detailed planning and design guidelines to support the planning controls in the Canada Bay LEP. The Consent Authority is required to take into consideration the relevant provisions of the DCP in determining an application for development affecting a locally listed heritage item. Part C of the Canada Bay DCP outlines the planning and design guidelines for heritage matters. The proposed works have been assessed in accordance with the heritage provision of the Canada Bay DCP 2013.

Table 4. Overview of Canada Bay DCP heritage provisions relevant and applicable to the site.

Canada Bay DCP - Part C: Heritage		
C2 Development of Heritage Items		
C2.1 Setting		
Objectives		
O1.	To provide an appropriate visual setting for heritage items, including landscaping, fencing and car parking.	
O2.	To ensure that new development respects the contribution of a heritage item to the streetscape and/or townscape.	
Controls		**Extent Heritage assessment**
C1.	Elements that contribute to the setting of a heritage item, including things such as landscaping, fences, driveways, seawalls etc must be retained	The 100% Schematic Design will retain key features that contribute to the setting of Concord High School.
C2.	Alterations and additions should be located at the rear.	Modifications to the school's original layout and form is limited to buildings on the periphery of the site. The 100% Schematic Design is consistent with this control.
C3.	Ancillary structures at places of heritage significance such as secondary dwellings, swimming pools and outbuildings should be located at the rear so that they do not impact on the setting of the heritage item.	The 100% Schematic Design has considered the setting of the school. The new buildings will be located along Stanley Street. This is appropriate as it provides a heritage outcome with a lesser impact to significant vegetation and setting. The new buildings will be screened by established vegetation along the Stanley Street boundary.
C4.	Cut and fill or other work that changes the landform around a heritage item should generally be limited to 1m. Basements under heritage items are not acceptable	As the study area has been assessed to have potential to contain archaeological remains of local significance, no ground disturbance can take place until appropriate excavation permits and mitigation methods are in place. The change in landform will have no impact to the built environment.
C5.	Secondary dwellings are only possible on sites that are large enough to retain a	The 100% Schematic Design retains an appropriate landscape setting commiserate

Canada Bay DCP - Part C: Heritage		
	landscape setting around the house commiserate with the scale of the house, including a backyard with trees.	to the scale of the existing school and proposed development.
C6.	Secondary dwellings must not detract from the setting of a heritage item.	While it will be identifiably new and contemporary, the 100% Schematic Design will not detract from the setting of Concord High School. The use of similar forms and architectural influence, paired with an appropriate colour and material palette, and sensitive landscaping will ensure the proposed development is a sensitive and sympathetic addition to the site.
C2.2 Scale		
Objectives		
O.1	To ensure that additions to a heritage item and new buildings on the site of a heritage item are of a scale consistent with the heritage item.	
O.2	To ensure that the heritage item remains the visually dominant element on the site.	
Controls		**Extent Heritage assessment**
C1.	Alterations and additions to a heritage item should not be larger in scale than the heritage item and should preferably be single storey.	A larger school building is required to meet the increased student capacity and amenity.
C2.	Development of a larger scale than the heritage item is allowable only if the new development is visually subservient, will not detract from the aesthetic qualities of the place, and important views of the heritage item.	The key features associated with this landscape will not be visually obstructed by the new development. The aesthetic values of the site will be retained. While the proposed development represents a larger building, the fenestration, setback from existing buildings and stepped design, will ensure the new building does not overwhelm the scale of the existing built environment.
C2.3 Form and Detailing		
Objectives		
O1.	To ensure that important elements of the form of a heritage item are not obscured or destroyed by alterations and additions.	
O2.	To ensure that the form of a heritage item retains its importance in the streetscape and/or townscape.	
O3.	To ensure that important interior spaces are retained.	
O4.	To ensure that alterations and additions do not have a detrimental impact on the structural integrity of a heritage item.	
Controls		**Extent Heritage assessment**

Canada Bay DCP - Part C: Heritage		
C1.	Important elements of a heritage item, such as walls, roofs, windows, doors, chimneys, parapets, decorative elements, verandahs, joinery, gable ventilators, etc must not be demolished, must retain their integrity (including structural integrity), and must not be obscured by alterations and additions.	The 100% Schematic Design will not obscure important elements associated with the heritage item.
C2.	Verandahs on the front and sides of a heritage item must not be infilled.	N/A
C3.	Additions should be attached to the original part of the building as wings, linked pavilions or skillions at the back of the house. Additions should not be higher than the ridgeline of the existing building and the existing roof over the main body of the building must be retained. Pavilion additions must be set slightly apart from the original house and connected with a lower built element.	N/A
C4.	New development, and alterations and additions to heritage buildings, must not to detract from the visual importance of the heritage item.	While the proposed development will be visible from the public domain, the 100% Schematic Design will not detract from the visual importance of the heritage item. The 100% Schematic Design takes cues from the existing built environment and surrounding vegetation to form a compatible contemporary addition to the site. New entrances and associated landscaping along Crane Street will enhance views to the item. The removal of all demountable buildings on site will also provide a positive heritage outcome, enhancing views to and from the item.
C5.	Mock historical details should not be applied, as they will not be of any heritage value themselves and can confuse our understanding of what is 'old' and 'new'.	The 100% Schematic Design is an identifiably new and contemporary building, consistent with this control.
C6.	"Pop top" additions (an additional form extruding above the roof rather than above the external walls below) are not acceptable.	N/A
C7.	Important interior spaces and elements must be retained.	N/A
C8.	Alterations and additions must result in a final building that is a visually cohesive whole.	The proposed development will be visually cohesive with the existing school campus through façade fenestration, material palette and colour scheme.
C2.4 Materials and colours		

Canada Bay DCP - Part C: Heritage		
Objectives		
O1.	To ensure that original materials that contribute to the significance of heritage items are not obscured.	
O2.	To ensure that colours of paintwork on heritage items are consistent with the significance of the heritage item.	
O3.	To ensure that external materials and colours of new development relate well to the materials and colours of the heritage item.	
Controls		**Extent Heritage assessment**
C1.	Original materials of heritage items must not be replaced with different materials or materials of different colour	N/A
C2.	Non-original materials of heritage items that are being replaced shall be replaced with material that matches the original material as closely as possible.	N/A
C3.	Painting or rendering original face brick walls is not permitted, and re-skinning may exceptionally be considered where condition of fabric does not allow its further retention. Timber houses may be re-clad with timber weatherboards of a profile to match existing. Re-roofing should use materials matching the original.	N/A
C4.	The detail and texture of original rendered finishes should not be changed.	N/A
C5.	Materials for additions and alterations to heritage items should be harmonious with the original materials of the heritage item.	The materials and colour of the proposed development take cues from the existing built environment and surrounding vegetation, harmonising with the original materials.
C6.	Colour schemes for heritage items should have a hue and tonal relationship with traditional colour schemes for the period and style of the heritage item	The materials and colour of the proposed development take cues from the existing built environment and surrounding vegetation, harmonising with the existing built environment.
C7.	The use of fluorescent paint and primary colours on heritage items is not permitted.	N/A
C8.	The use of modern finishes including stencilled concrete for driveways is not permitted.	N/A
C9.	Where it is not possible to retain an original building or landscape component, the new component is to match the original.	The 100% Schematic Design has made a considered effort to sympathetically design a new school building within this heritage sensitive area.

Canada Bay DCP - Part C: Heritage		
C10.	Missing original components of the heritage item should be replaced.	N/A
C2.8 Landscape elements including paving and driveways		
Objectives		
O1.	To retain important landscape elements that contribute to the significance of heritage items.	
O2.	To reinforce the qualities of the heritage item through appropriate landscaping.	
Controls		**Extent Heritage assessment**
C1.	Original driveways and footpath crossings that relate to a heritage item must be retained. The design and materials of the original driveway should be retained, and if missing, replaced.	N/A
C2.	New driveways should be pairs of driveway strips of off-white or red oxide concrete, or brick on edge, with grass or ground cover between.	N/A
C3.	There must be only one driveway and the width of the driveway must be minimised. Double driveways and footpath crossings are not permitted.	N/A
C4.	Original or early garden layouts and plants that contribute to the significance of the heritage item must be retained.	To enable the increased student capacity and improve student and staff amenity, the proposed development will require the construction of a larger building, resulting in the relocation of courts and carparking. The location of the proposed development will have a minor impact on significant landscape elements. However, the development will see no change to a majority of the landscaping and areas of high significance. The overall form and layout of the school, and the contributing landscape features will be retained.
C5.	New trees must be planted in the case where it is proposed to remove existing trees.	The landscaping strategy will reintroduce soft landscaping around the new building and entrances. Where possible and feasible, this will include tree plantings.
C6	Established trees, shrubs, boundary planting and garden layouts that contribute to the significance of the heritage item must be retained. This includes trees in the public domain which may be affected by development	To enable the increased student capacity and improve student and staff amenity, the proposed development will require the construction of a larger building, resulting in the relocation of courts and carparking. The location of the proposed development will have a minor impact on significant landscape elements. However, the development will see no change to a majority of the landscaping and areas of high significance.

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		The overall form and layout of the school, and the contributing landscape features will be retained. The proposed development will have no impact on heritage listed trees in the public domain.
C7.	When designing new gardens, surviving plants and garden elements which indicate the basic garden structure, must be incorporated into new appropriate designs that complement the style of the building.	The 100% Schematic Design complies with this control.
C8.	Garden space must be sufficient to accommodate a large spreading tree, lawn, and shrubbery, in the backyard of a house.	N/A
C2.10 Services		
Objectives		
O1.	To ensure that new services are designed and located so they do not adversely affect the aesthetic values of the place	
O2.	To ensure that new services do not require the removal or obstruction of built and landscape features that contribute to the heritage values of the place.	
Controls		**Extent Heritage assessment**
C1.	New services must not damage built and landscape features that contribute to the heritage significance of a place.	New services will not damage built and landscape features that contribute to the significance of the place.
C2.	New services must be located where they do not disrupt the aesthetic qualities of a place.	New services with either replace existing with an upgraded 'like for like' option, or below ground. As the study area has been assessed to have potential to contain archaeological remains of local significance, no ground disturbance can take place until appropriate excavation permits and mitigation methods are in place.
C3.	Air-conditioning units must not be located on roofs if this would result in the units being visible from the public domain.	N/A
C4.	Telecommunication elements such as conduits and junction boxes must not be located on front facades.	N/A
C5.	Storm water detention tanks, water storage tanks and the like must not be located within the front setback, except in the case that they are located below a driveway.	N/A
C6	Kiosk substations and fire hydrant boosters must be located where they will have the	N/A

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	least visual impact, and must be integrated into the landscape scheme.	
C7.	Services such as solar panels, television aerials and satellite dishes are to be located on roof slopes facing the rear of heritage items.	N/A
C8.	Services should not be higher than the main ridge line of a building that is or is part of a heritage item and shall be located so that they are not visible from the public realm.	N/A
C9.	Lifts, if required, must be installed where existing building fabric and spaces have little or no significance.	N/A
C10.	Fire services must respect existing building fabric and details, including minimising changes and being appropriately located.	N/A
C11.	New service must not interrupt significant spaces and building fabric.	New services will not interrupt significant spaces, fabric or landscape features.
C2.11 Demolition		
Objectives		
O1.	To retain buildings that are of heritage significance or components of the site that contributes to the significance of a heritage item.	
Controls		**Extent Heritage assessment**
C1.	Buildings that are listed as heritage items or contribute to the significance of a heritage item should not be demolished.	N/A
C2.	Partial demolition of a heritage item or its significant components, should only be allowed when it can be established that the partial demolition will have acceptable impact on the significance of the heritage item, or when the condition of fabric is such that its failure is imminent. In the latter case, a reconstruction of demolished fabric may be required.	The proposed development will require the partial demolition of Blocks E, F and G which form a part of the original school configuration and layout. This is limited to buildings on the periphery and is assessed as acceptable as it will enable the construction of improved school amenities for students and staff. The partial removal of landscape elements is limited to vegetation within the construction footprint. The proposal has followed a cautious approach, in accordance with the Burra Charter principles advocating for 'as much as necessary, as little as possible.' Overall, the wider heritage values of the site and landscape significance will be retained and conserved. The 100% Schematic Design will see no change to significant landscape features associated with the Farleigh Nettheim tannery. The proposed

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		development will see a moderate change to the planned gardens and cultural plantings associated with the late 1970s campus of Concord High School, however this is assessed as having a minor impact on the heritage significance.

11. Conclusion and recommendations

11.1 Conclusion

Built Heritage

This Statement of Heritage Impact has considered the potential heritage impacts of the proposed 100% Schematic Design on the heritage significance of Concord High School. Concord High School is a local landscape heritage item listed for its aesthetic and representative values. The Preliminary Heritage Assessment prepared by Extent Heritage in 2022 established that the site is also of significance at the local level for its historical, associative, research potential, rarity and representative values. The Preliminary Heritage Assessment recommended that these values be respected and retained as part of the redevelopment of the school, specifically through the use of sympathetic design, and the retention of vegetation and the landscaped character of the school.

It is considered that the new buildings and landscaping proposed in the 100% Schematic Design constitute works that complement and respect the existing character and qualities of the school. The new buildings are to utilise an architectural form and language inspired by the existing context, and new landscaping is to provide a continuation of the existing close integration of landscaping throughout the dynamic layout of the school buildings.

The 100% Schematic Design is therefore considered acceptable in consideration of the site's heritage significance and will have a minor impact on that significance.

Historical archaeology

Analysis of historical sources has found that during Phase 1 (1788-1840s) the region surrounding the study area was first developed in 1793 with the Longbottom Farm and subsequently the Longbottom Stockade. The study area is located to the north of this area. During Phase 2 (1848-1880) John Walker was granted a parcel of land that included the present study area. The study area then went through several owners with no clear indication of development taking place. It is likely the area was cleared and used for pastoral purposes. In 1867 a sales notice for land within the study area noted the presence of a twelve-pit tannery and three cottages. These structures are thought to have been located in the north-east corner of the study area. In Phase 3 (1880-1970), the study area was purchased by Farleigh and Nettheim with the intention of developing a tannery. Reportedly the twelve-pit tannery was absorbed into the new building. It is unclear if the cottages were retained or not at this time. Over the decades the tannery grew in size. In 1970 the tannery shut down and the land was bought by NSW Education. Construction for Concord High School began in 1978 with the school opening in 1980. During construction the tannery was demolished.

The study area has been assessed to have moderate potential for historical archaeological remains associated with Phases 2 (1848-1880) and 3 (1880-1970). Areas that had been impacted by the construction of Concord High School during Phase 4 (1970-present) were assessed as having low potential, while areas outside of the footprint of the Concord High

School buildings were found to be low-moderate. Generally this is the case on the east side of the study area.

The potential archaeological remains identified at the study area were assessed to be of local significance for historical and research values.

The proposed redevelopment of Concord High School involves the construction of several new blocks in the south-east corner of the study area and the extension of a carpark on the south-western side of the study area. This development will involve piling across the footprint of the blocks and the bringing in of fill to build up the ground level. The carpark will require ground disturbance in order to level the area. However, the carpark is planned in an area of low potential and is unlikely to impact archaeological remains of local significance.

Geotechnical reports for the site have recommended that existing fill on the site be removed up to a depth of 0.1m to 4.5m prior to construction. The fill was observed to be deepest on the eastern side of the study area. As such, the development of the new blocks is considered an impact to the potential archaeological remains identified at the study area with the development having the potential to disturb or remove the potential archaeological resource.

11.2 Recommendations

11.2.1 Built Heritage

Based on our assessment of the proposed scope of works, we make the following recommendations:

- This SOHI is to accompany a Development Application to Canada Bay Council.
- If the scope of works is changed to involve any additional impacts to any significant features or fabric not explicitly outlined in this report, further heritage assessment will be required.
- The landscaped character of Concord High School must be retained and respected. The works should be carried out in accordance with the recommendations of a suitably qualified arborist.
- Prior to works commencing, contractors must be briefed on the heritage sensitive nature of the site and informed of any recommended mitigation measures or controls required.
- The construction methodology should be reviewed and endorsed by the Project Arborist prior to undertaking the works to ensure there is no impact to significant trees within the vicinity of the proposed works.
- Building and construction materials should not be stockpiled against any buildings on site and located at a suitable distance away from significant landscape elements (trees and garden beds). Laydown areas and high-traffic areas should have a clear separation from heritage elements (built and landscape) on the site. The graded elements of significance in Section 6.2 should be used to guide the location of suitable laydown areas.

- Any accidental damage to heritage items is to be treated as an incident, with appropriate recording and notification.

- All areas affected by works must be cleaned and made good by contractors after they have completed their works. This may include replanting of low-lying vegetation or mature trees impacted by the construction works. Replanting with a like for like option is appropriate.

11.2.2 Historical Archaeology

Given that the site has low-to-moderate potential for locally significant archaeological remains, it is recommended that the following mitigation of potential development impacts be carried out:

- Following confirmation of the 100% Schematic Design, as part of the risk management for the project, it is recommended that a program of test excavation be undertaken at the earliest opportunity to determine the extent, nature, and level of preservation of archaeological relics that may survive at the site. This would inform decisions on how to manage the archaeological resources in the remaining portions of the site.

- As the potential archaeological resource has been assessed to be of local significance; it is recommended that a program of archaeological testing be undertaken under an S139(4) exception 2, in accordance with the guidelines *Relics of local heritage significance: a guide for archaeological test excavation* (Heritage NSW, 2022). As per the guide, Step 1 has been completed through the preparation of this report. Steps 2 and 3, regarding the preparation of a test excavation research design and methodology would need to take place prior to onsite works commencing. We recommend this takes the form of an Archaeological Research Design (ARD) report. The ARD would determine the placement of test trenches based on the proposed impact areas and the potential archaeological resource. It is likely that these areas would be the parts of the school grounds that fall within the tannery footprint, outside of existing school buildings and within the proposed impact areas. This will ensure that the presence or absence of archaeological remains within the footprint of the proposed development is evaluated.

- Following the completion of the archaeological test excavation, a report summarising the results would be prepared. It would provide recommendations for archaeological management throughout the subsequent project phases. These might include modifications to development design as an avoidance strategy, further recommendations for salvage after thorough recording, or protection of remains prior to their being built on. As per the guide for S139(4) exception 2, the post-excavation report and all excavation records would need to be held by the proponent for a reasonable amount of time.

- Depending on the testing results, it may be necessary to undertake a reassessment of potential archaeological significance, including an update of this report.

- Further archaeological management of the site's resources would be determined on the basis of the results of the program of archaeological testing.

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