

HISTORICAL ARCHAEOLOGICAL IMPACT ASSESSMENT

The Kings School
North Parramatta Campus

Prepared for

TSA MANAGEMENT ON BEHALF OF THE KINGS SCHOOL

3 November 2023

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EXECUTIVE SUMMARY

Urbis has been engaged by TSA Management on behalf of The Kings School ('the proponent') to conduct an Historical Archaeological Impact Assessment (HAIA) for The Kings School's North Parramatta Campus at 87-129 Pennant Hills Road, North Parramatta, legally referred to as Lot1, DP 59169; Lots A and B, DP 329288; Lot A, DP 321595; Lot 2, DP 235857; Lot 1, DP 64765; Lot 1, DP 57491; Lot 1, DP 581960; Lot 10, DP 812772 ('the subject site'). The subject site is located within the City of Parramatta, and falls under the administrative authority of the Metropolitan Local Aboriginal Land Council (LALC).

The HAIA has assessed the potential impact of the currently proposed works. The proposed works for the subject site under the SSDA broadly entail the provision of new and upgraded facilities for the school. These include the construction of a new Sports Pavilion, Boarding House, Day Boy House, westward vehicular entrance into the site and a new building for Science, Technology, Engineering, Arts and Maths (the 'STEAM building'). Other works include the demolition of four (4) tennis courts to be replaced with 9 new townhouse residences, as well as future proposed upgrades to the Preparatory School. Any works within the subject site that fall outside the scope of the currently proposed works will require the preparation of an updated HAIA.

The HAIA has been undertaken to investigate the potential for historical archaeological resources to occur within the subject site, and any significance associated with these resources to assess the likelihood for impact to significant resources resulting from the proposed works. The HAIA included the following:

- Searches of statutory and non-statutory heritage listings (Section 2).
- Historical research on the subject site including analysis of historic mapping and imagery (Section 3).
- A physical survey of the subject site (Section 4.3).
- Analysis of relevant archaeological assessments (Section 4.1).
- Assessment of archaeological potential (Section 5).
- Assessment of archaeological significance (Section 5.3).
- Archaeological impact assessment (Section 7).
- Provision of recommendations for the management of archaeological relics (Section 8).

Conclusions

This HAIA has concluded the following in relation to the historical archaeological context of the subject site.

- There is **low potential** for archaeological resources to occur dating to Phase 1. Archaeological remains anticipated to occur from this phase include post holes and crop/plough marks.
- There is **low potential** for archaeological resources to occur dating to Phase 2. Archaeological remains anticipated to occur from this phase include demolition material, ephemeral remains and evidence of landscaping (including early road surfaces). There is, however, **high potential** for remains of the Burns family gravesite to occur in association with this occupational phase.
- There is **low-moderate potential** for archaeological resources to occur dating to Phase 3. Archaeological remains anticipated to occur from this phase include structural remains, demolition material and ephemeral evidence of agriculture.
- There is **low potential** for archaeological resources to occur associated with Phase 4. Archaeological evidence associated with this phase is anticipated to include demolition material.
- Archaeological resources associated with the early agricultural land use phases at the subject site would meet the threshold for significance on a Local level, for their historic significance (criterion A) and research potential (criterion E) should they survive with high integrity.
- Archaeological remains of the Burns family residence (and gravesite) including structural remains, deep features, evidence of landscaping and human remains would also meet the threshold for significance on a Local level. This is due to their historic significance (criterion A), associative significance (criterion B) and research potential (criterion E) should they survive with high integrity.

- Structural remains associated with the Burnside Orphan Homes and Australian Army Divisional Headquarters could meet the threshold for significance on a Local level, for their social significance (criterion D) should they survive with high integrity.

The following conclusions relate to the likelihood for impact to archaeological relics based on the above:

The proposed Stage 1 works are **not likely** to result in impact to relics of Local significance which could occur at the subject site, being outside of areas of identified archaeological potential for significant relics.

- Stage 2 works are may impact archaeological relics of State or Local significance, however insufficient information is currently provided to assess the impacts of these works. Further assessment at the detailed design phase is required, with particular consideration to the level of ground disturbance proposed in these works.

Recommendations

In view of the above conclusions, Urbis makes the following recommendations:

1. A copy of this HAIA should be retained, with the archaeological zoning plan included as Figure 72 utilised as a reference figure for future development works at the site.
2. This report should be updated with reference to Stage 2 works at detailed design phase. This should include the provision of archaeological design advice at detailed design phase to mitigate the risk of impact to relics of Local significance.
3. The Stage 1 works should be subject to an archaeological unexpected finds procedure, including archaeological induction to contractors prior to works to ensure familiarity with archaeological resource types and legislative obligations. The unexpected finds procedure should include the following steps:
 - 3.1. Works must cease immediately in the area of the unexpected find and Urbis notified of the discovery. The area should be cordoned off with signage indicating this area as a no-go zone.
 - 3.2. Depending on the nature of the discovery, Heritage NSW may be notified in writing in accordance with Section 146 of the *Heritage Act 1977*. Additional assessment and possibly an excavation permit may be required prior to the recommencement of excavation in the affected area.
 - 3.3. Works cannot recommence in the area of the unexpected find prior to the receipt of written approval of the project archaeologist and, if required, Heritage NSW.
4. No works are proposed in the Burns Family Cemetery area and as such it is unlikely that human remains will be encountered. However, in the unlikely event that human remains are uncovered, the following procedure must be implemented:
 - 4.1. Works must cease immediately in the area of the unexpected find and Urbis/the project archaeologist notified. The area should be cordoned off with signage indicating this area as a no-go zone.
 - 4.2. The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW (Enviroline 131 555).
 - 4.3. The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.
 - 4.4. Management recommendations are to be formulated by the NSW Police, Heritage NSW and site representatives.
 - 4.5. Works are not to recommence until the find has been appropriately managed.

1. INTRODUCTION

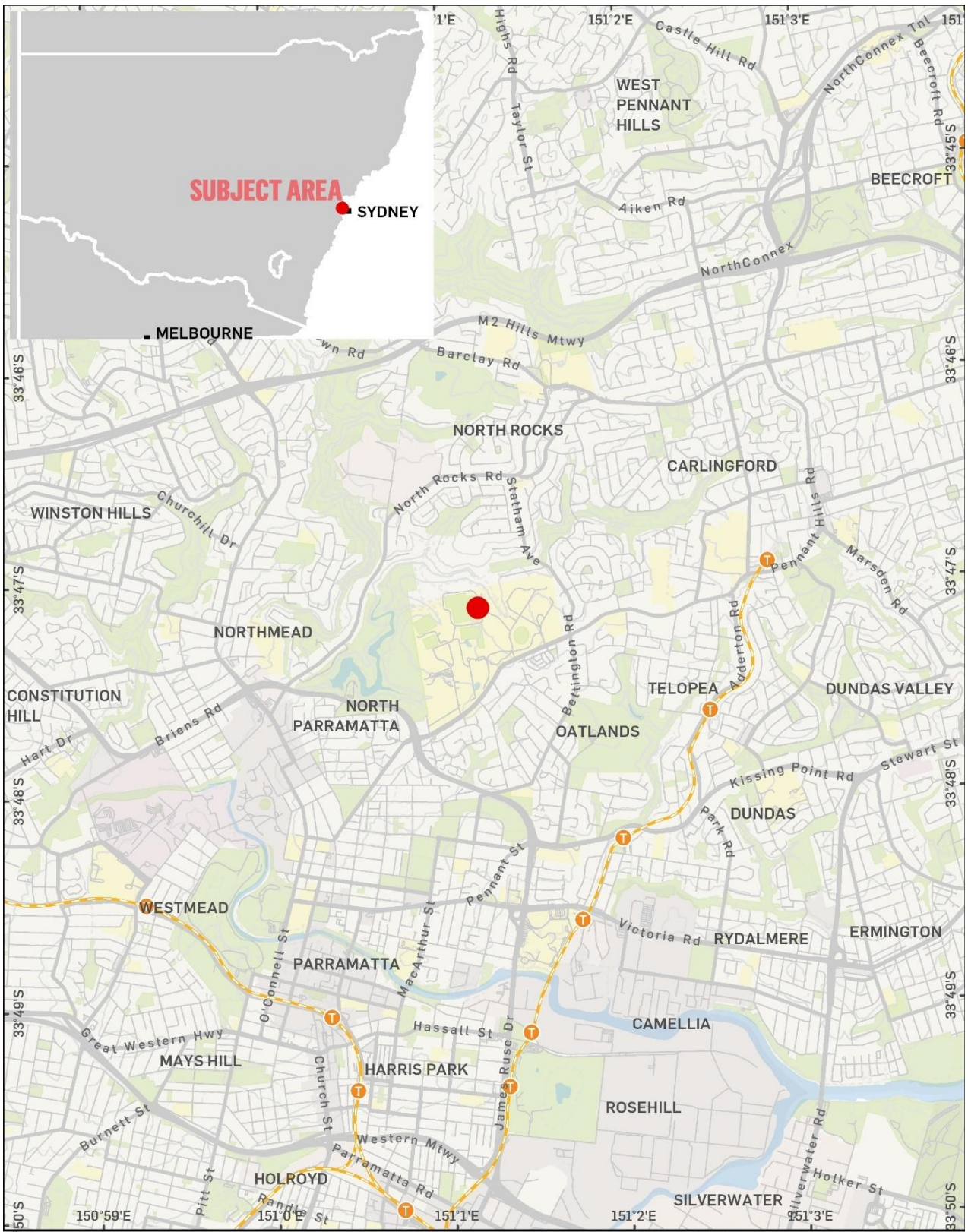
Urbis has been engaged by TSA Management on behalf of The Kings School ('the proponent') to conduct an Historical Archaeological Impact Assessment (HAIA) of The Kings School's North Parramatta Campus at 87-129 Pennant Hills Road, North Parramatta, legally referred to as Lot1, DP 59169; Lots A and B, DP 329288; Lot A, Local DP 321595; Lot 2, DP 235857; Lot 1, DP 64765; Lot 1, DP 57491; Lot 1, DP 581960; Lot 10, DP 812772 ('the subject site'). (Figure 1 and Figure 2). The subject site is located within the City of Parramatta Local Government Area (LGA), which falls under the administrative authority of the Metropolitan Local Aboriginal Land Council (LALC).

The HAIA has been undertaken to investigate the potential for historical archaeological resources to occur within the subject site, and any significance associated with these resources to assess the likelihood for impact to significant resources resulting from the proposed works.

1.1. SUBJECT SITE

The Kings School is located at 87-129 Pennant Hills Road, North Parramatta, legally referred to as Lot1, DP 59169; Lots A and B, DP 329288; Lot A, Local DP 321595; Lot 2, DP 235857; Lot 1, DP 64765; Lot 1, DP 57491; Lot 1, DP 581960; Lot 10, DP 812772. The subject site is located within the City of Parramatta on the traditional lands of the Dharug and falls under the catchment of the Metropolitan Local Aboriginal Land Council (LALC). Taken together, these lots form an irregular-shaped campus that 115.395 hectares in area, fronting Seville Reserve to the north and Pennant Hills Road to the south. Extensive bushland and tree canopy coverage shelters The Kings School on its north and west sides, beyond the campus' boundary. The subject site also retains a high proportion of the existing natural landscape, focusing most of its development within the southern and eastern areas of the site.

Identified elements of heritage significance include, on the campus' west, the Horseshoe Dam/Bridge and, on its east, the graves of Sir James Burns and his family. Further significant elements to the campus' south include the historic Gowan Brae House, Stables Gate House, Cedar Plantings, Boundary Fence, Aviary, Hayshed, Rotunda, Fountain, The Cedars and the Kings School Chapel.



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1 KM

Project No: P0034369
Project Manager: Meggan Walker

● Subject Area

REGIONAL LOCATION

The Kings School SSDA (TKS SSDA)
TSA Management on behalf of The Kings School

Figure 1 – Regional Location



GDA 1994 MGA Zone 56

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Project No: P0034369
 Project Manager: Meggan Walker

- Subject Area
- Contours
- Hydrology
- Ephemeral

LOCATION OF THE SUBJECT AREA
 The Kings School SSDA (TKS SSDA)
 TSA Management on behalf of The Kings School

Figure 2 – Subject Site Location

1.2. PROPOSED WORKS

This State Significant Development Application (SSDA) seeks consent for the staged redevelopment of The King's School, including:

- **Concept Proposal for the provision of new and upgraded facilities, including:**
 - Building envelope for a new Sports Pavilion within the western sports field precinct (subject to further detailed approval).
 - Building envelope for a new Boarding House within the northern residential precinct to the north of the Doyle Sports Fields and adjacent building envelope for Staff Quarters (subject to further detailed approval).
 - Building envelope for a new Day Boy House between Dalmas House and Burkitt House, including the associated relocation of Ryrie Road (subject to further detailed approval).
 - Earthworks and the associated demolition of existing buildings and structures, and removal of trees and landscaping.
 - Staged increase in staff and student numbers.
 - Detailed Stage 1 works (as outlined below).
- **Detailed Stage 1 works, including:**
 - Earthworks and the associated demolition and existing buildings and structures.
 - Traffic upgrade works including the construction of a new vehicular entrance into the site from Masons Drive, new drop-off pick up facilities, internal access roads and increased car parking and bus parking.
 - The construction of a new Staff Residence Building comprising residences for staff and their families within the Senior School Boarding Precinct.
 - The construction of a new building for Science, Technology, Engineering, Arts and Maths (the 'STEAM building') within the Senior School and associated landscaping.
 - The staged construction of new buildings required to upgrade the Preparatory School, including:
 - Construction of a new Performing Arts and Music Centre comprising a dedicated performance space and music practice rooms to the northwest of Horrocks Road.
 - Construction of a new General Learning Unit building comprising additional classrooms / general learning spaces adjacent to the existing dam.
 - Upgrades to pedestrian access throughout the school.
 - Staged increase in staff and student numbers.
 - The removal and replacement of trees and associated landscaping.

The impact assessment included in Section 7 assesses the proposed works listed above, in particular those associated with Stage 1, however, archaeological potential is discussed and zoned for the entire subject site. Plans for the proposed works, specifically those forming part of the detailed design, are included in Figure 6- Figure 17 below.



Figure 3 – The Kings School Masterplan, Demolition Plan for Stage 1.

Source: BVN, 2023



Figure 4 – The Kings School Masterplan, Stage 1 project plans.

Source: BVN, 2023

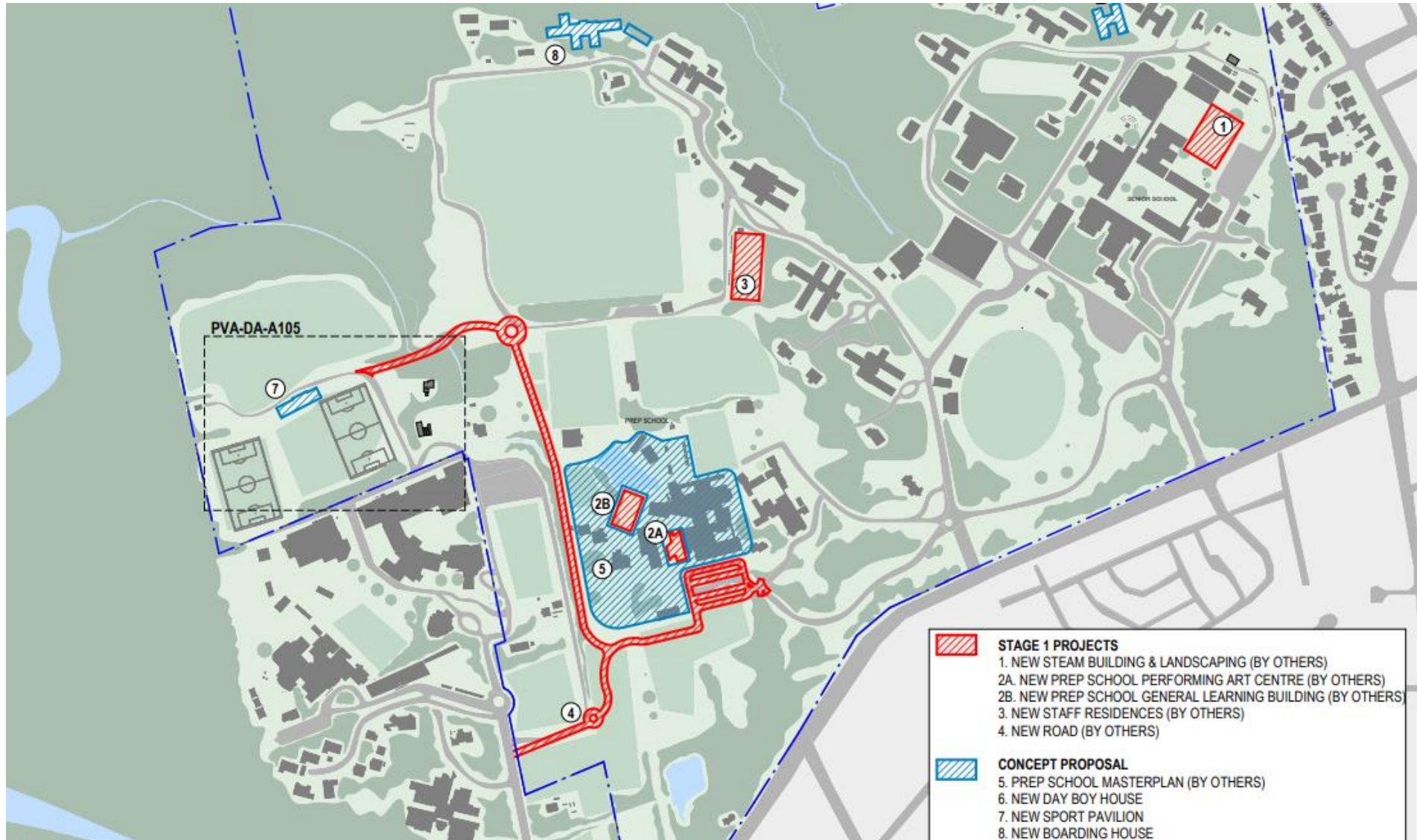


Figure 5 – The Kings School Masterplan, staging plans, showing new entry and areas for work. The current assessment is focused on the Stage 1 projects, for which the current SSDA includes detailed design.

Source: BVN, 2023

STEAM Building

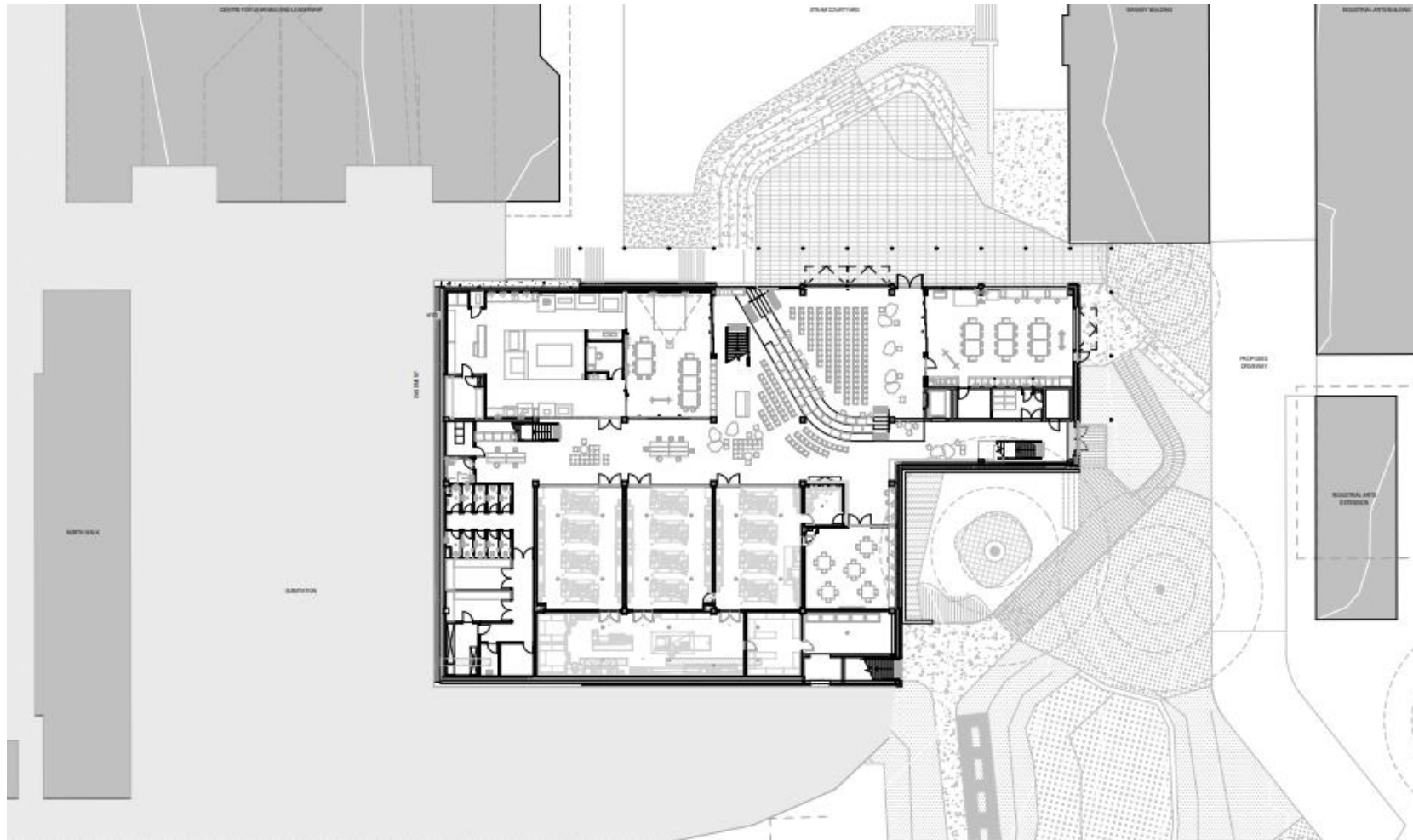


Figure 6 – General arrangement plan, STEAM building.

Source: BVN, 2023

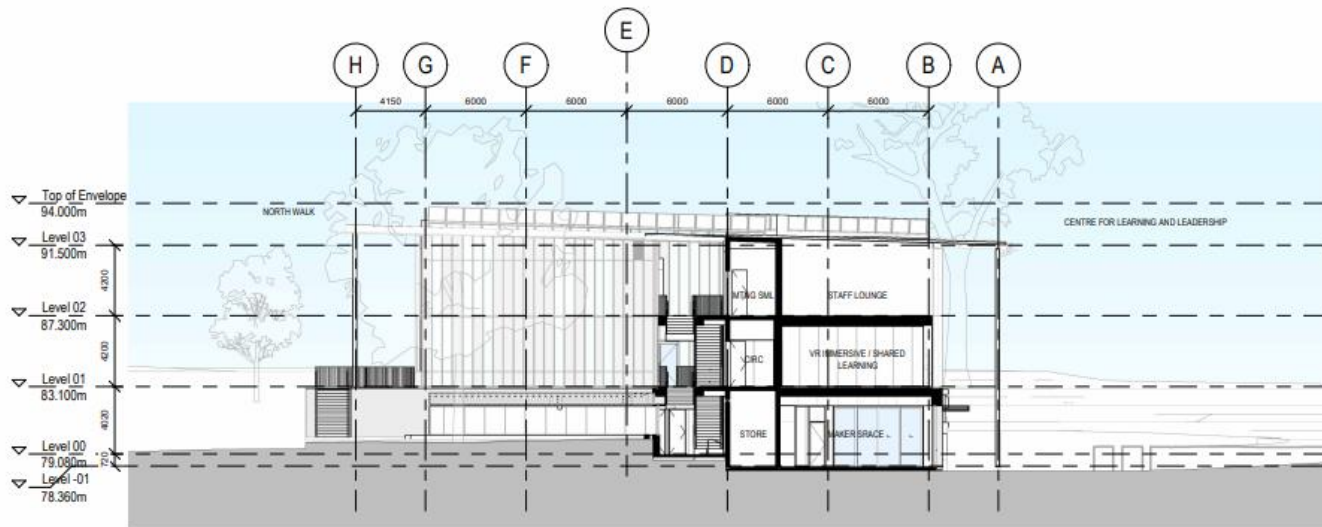


Figure 7 – East-West Sections, STEAM Building, showing partial excavation in the east to approximately 0.7m.

Source: BVN, 2023

Prep School



Figure 8 – Prep School, General Arrangement plan

Source: BVN, 2023

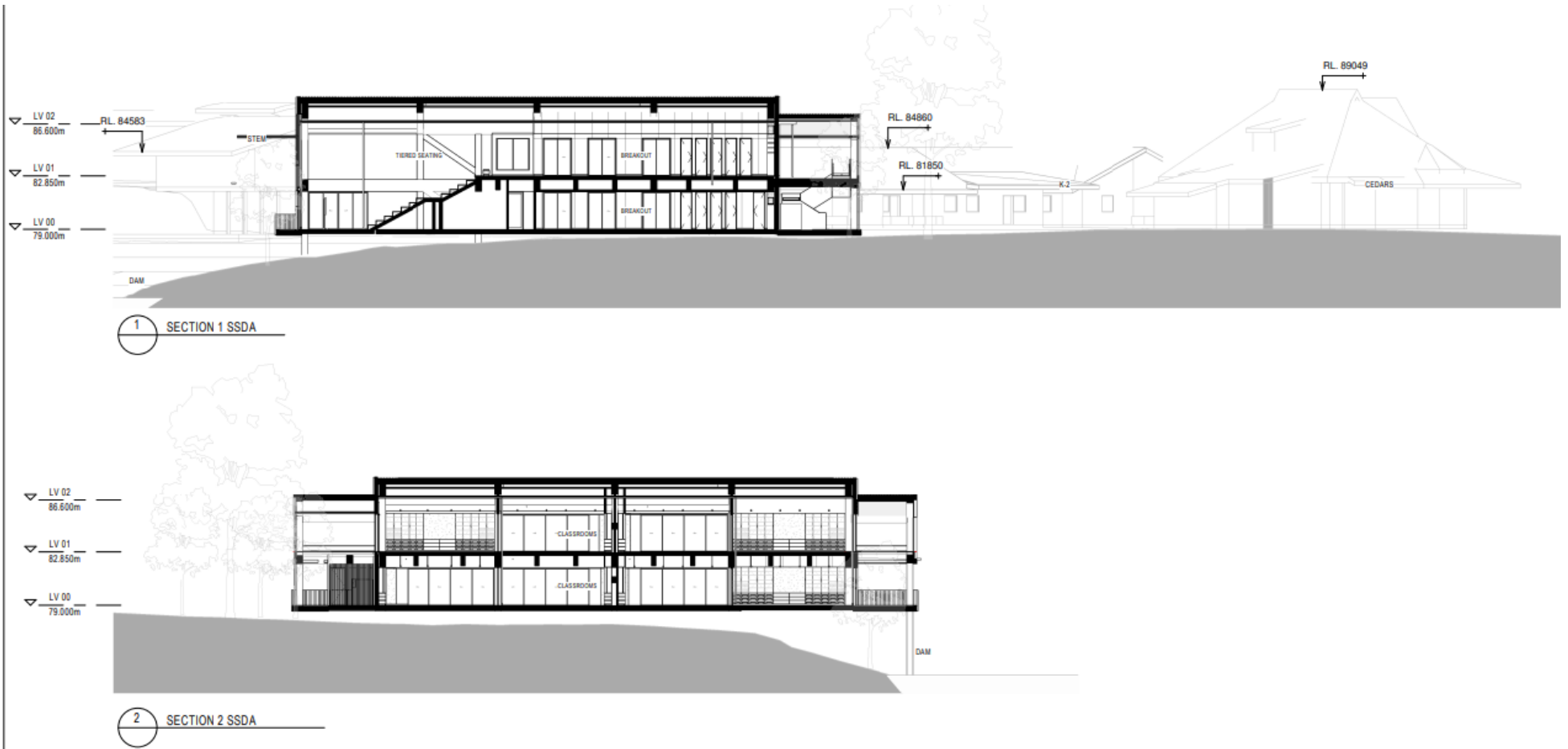


Figure 9 – Prep School, new building sections.

Source: BVN, 2023

Staff Accommodation

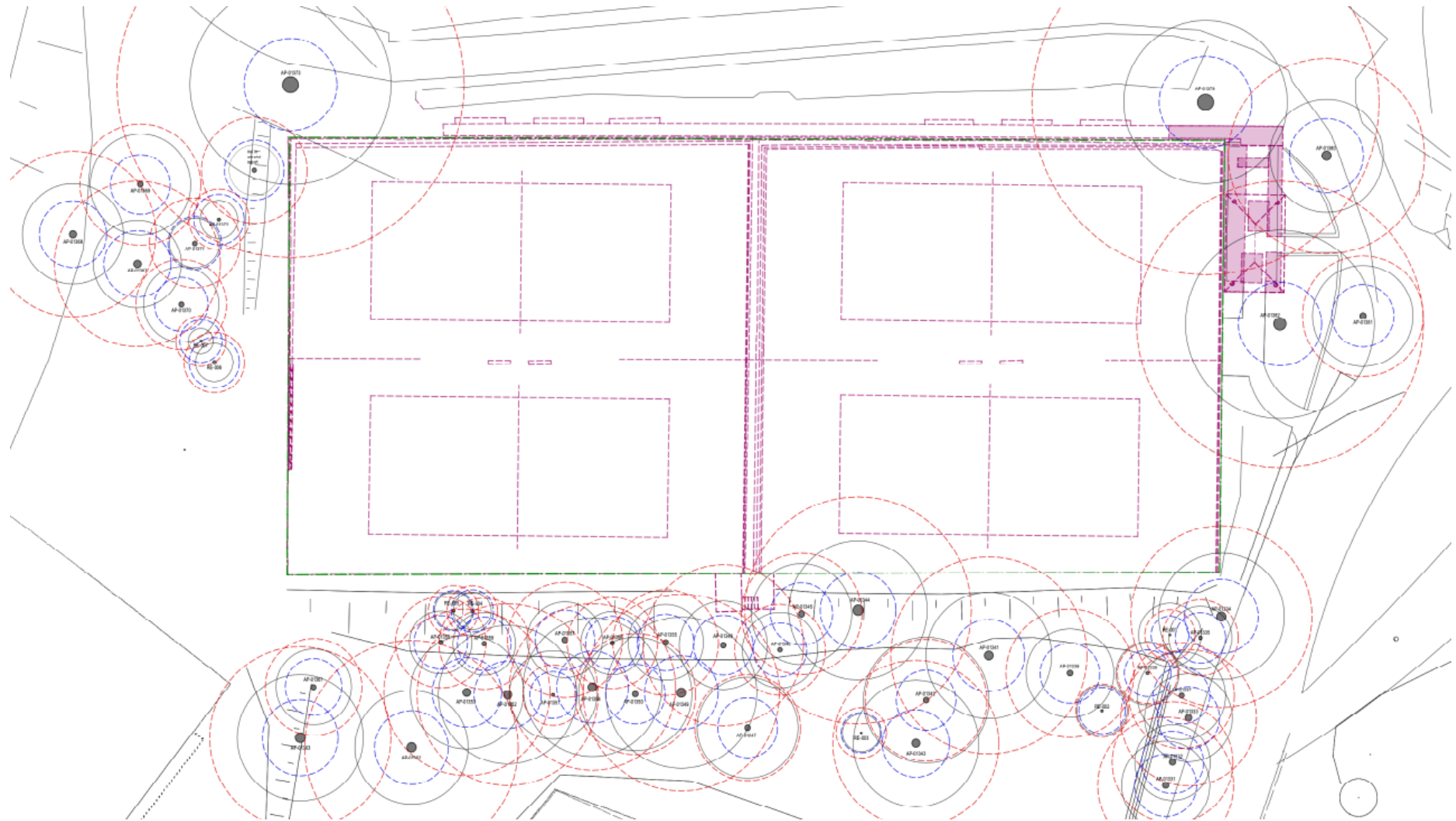


Figure 10 – Demolition plan, Staff Accommodation.

Source: Kennedy Associates Architects, 2023



Figure 11 – General Arrangement Plan, Staff Accommodation

Source: Kennedy Associates Architects, 2023

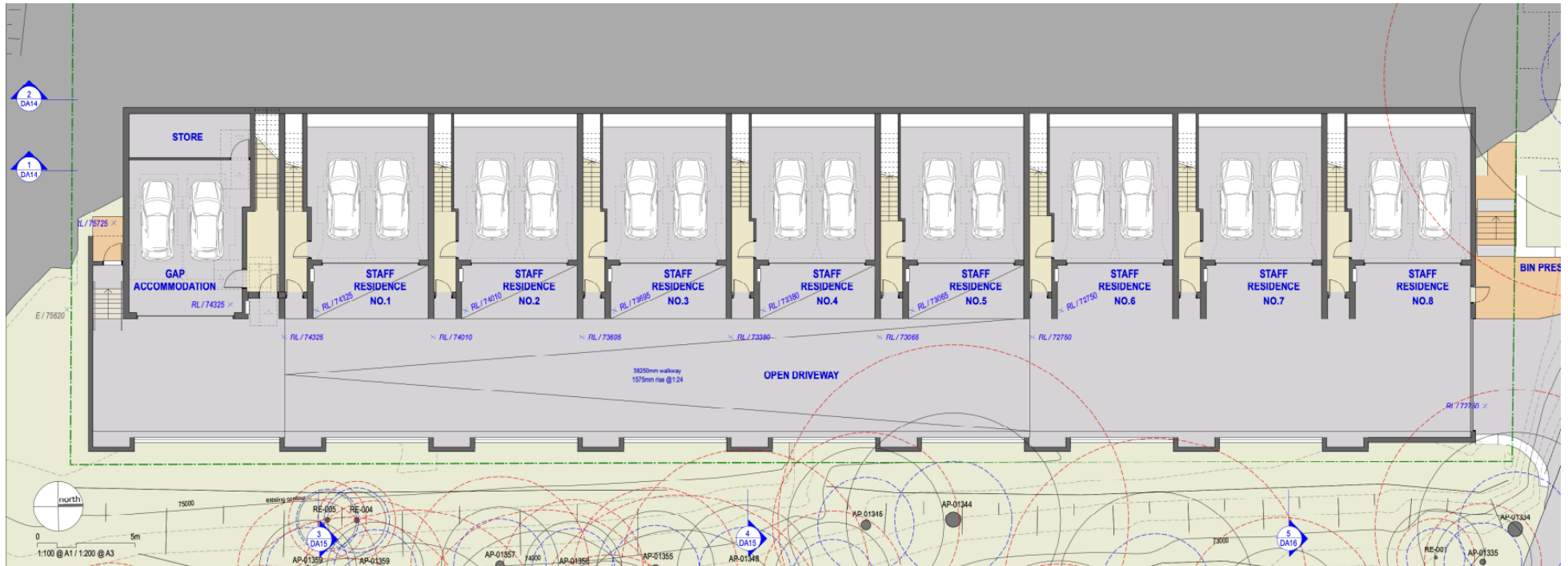
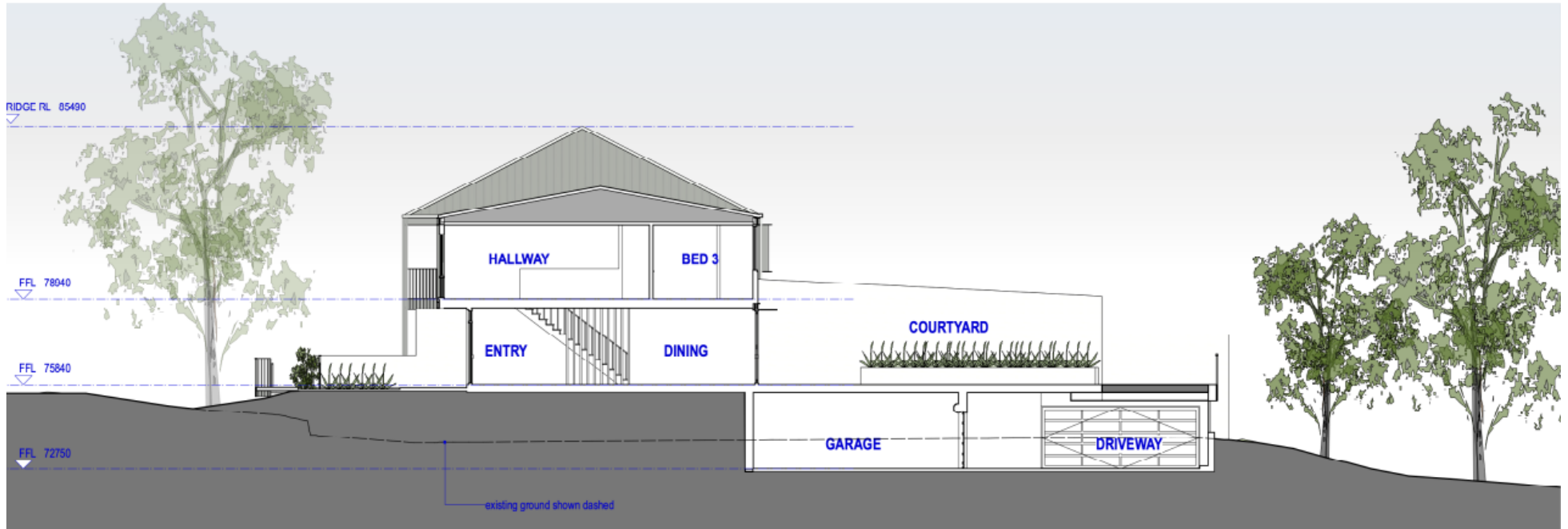


Figure 12 – Lower Ground Floor Plan, Staff Residences, showing partial excavation.

Source: Kennedy Associates Architects, 2023



SECTION 05

Figure 13 – Section, Staff Residences

Source: Kennedy Associates Architects, 2023

Day Boy and Boarding

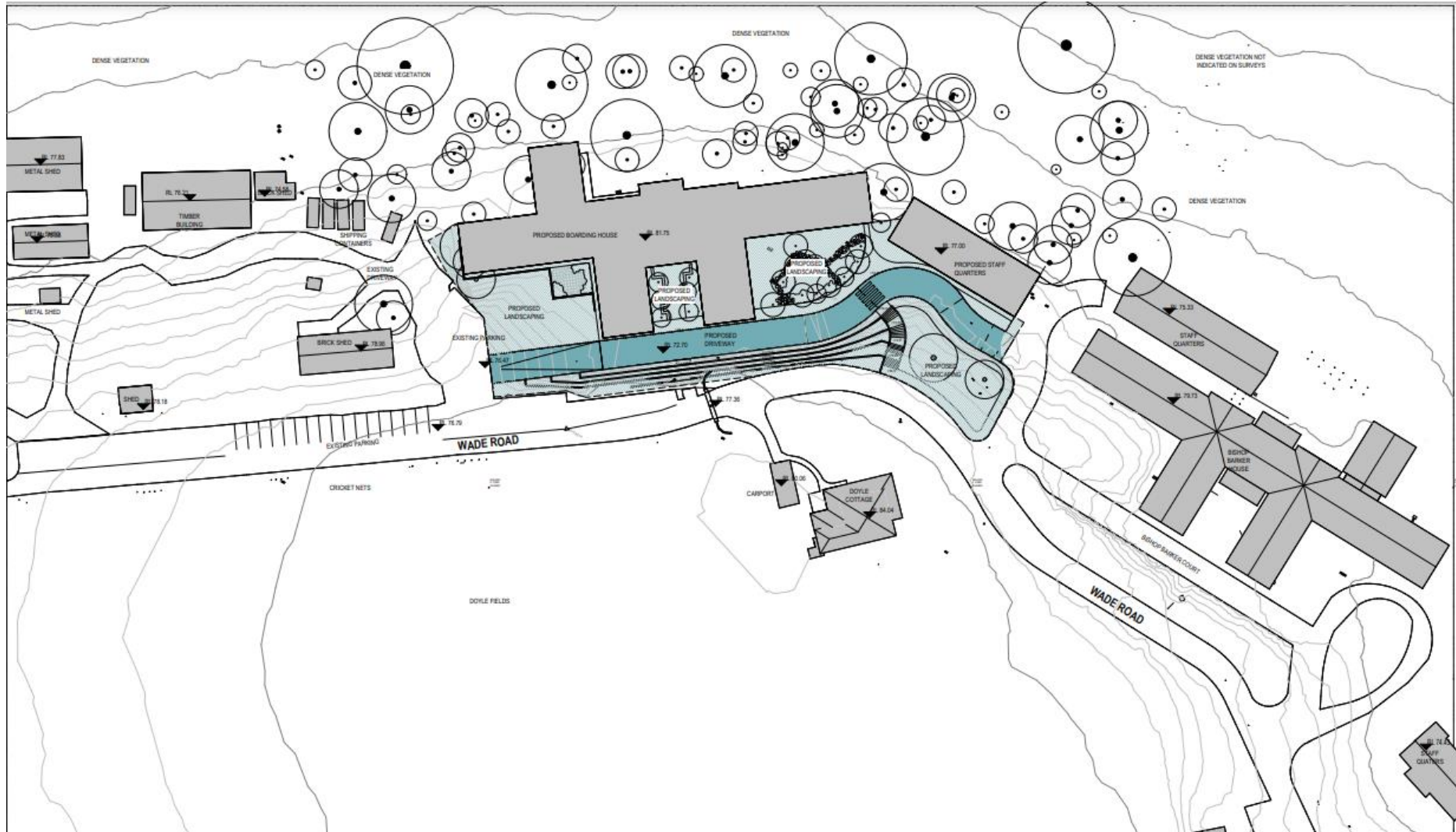


Figure 14 – Boarding House, General Arrangement Plan.

Source: Leaf Architecture, 2023

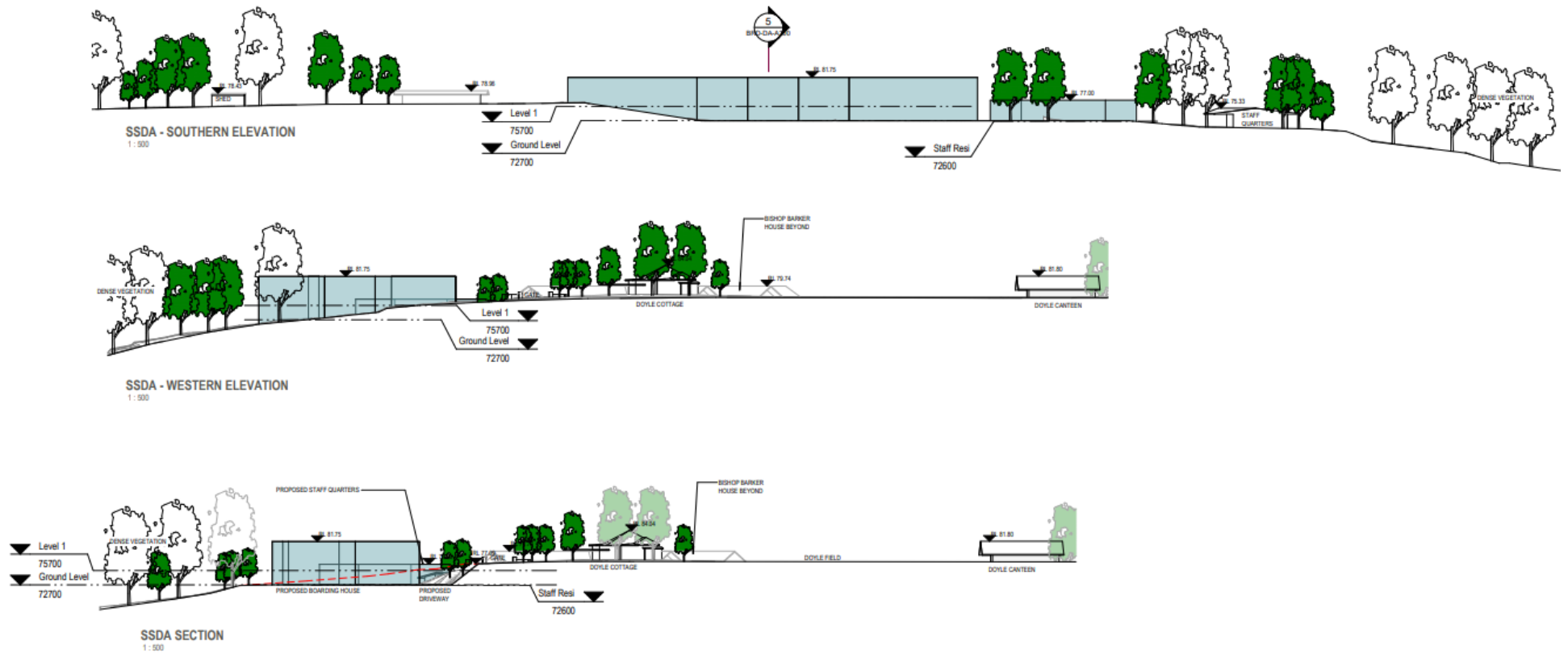


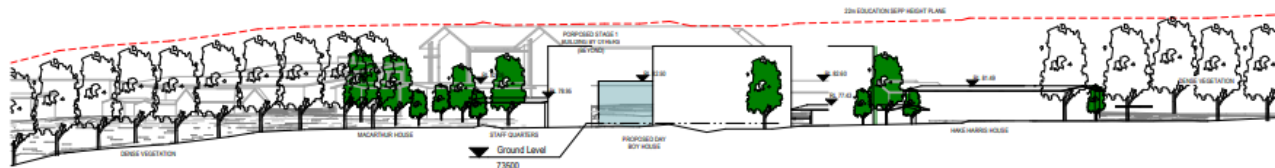
Figure 15 – Boarding House, Sections

Source: Leaf Architecture, 2023



Figure 16 – Day Boy House, general arrangement plan

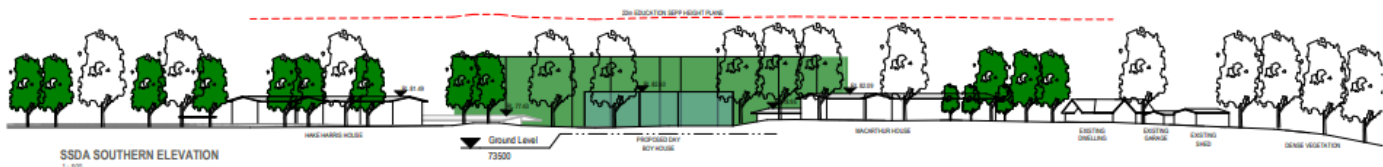
Source: Leaf Architecture, 2023



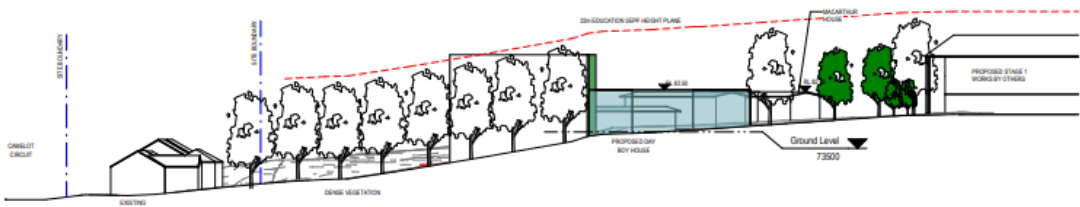
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SSDA EASTERN ELEVATION
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SSDA SOUTHERN ELEVATION
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SSDA WESTERN ELEVATION
1:500

Figure 17 – Day Boy House, Sections

Source: Leaf Architecture, 2023

1.3. METHODOLOGY

The HAIA has been undertaken in accordance with the principles and guidelines of *The Burra Charter*, *The Australia ICOMOS Charter for Places of Cultural Significance* (Australia ICOMOS Incorporated, 2013) ('Burra Charter') and as described in the following publications:

NSW Heritage Manual (Heritage Office and Department of Urban Affairs and Planning, 1996).

Archaeological Assessments (Heritage Office and Department of Urban Affairs and Planning, 1996).

Assessing Significance for Historical Archaeological Sites and 'Relics' (Heritage Branch of the Department of Planning, 2009).

Historical Archaeology Code of Practice (Heritage Office of the Department of Planning, 2006).

The HAIA included the following:

- Searches of statutory and non-statutory heritage listings (Section 2).
- Historical research on the subject site including analysis of historic mapping and imagery (Section 3).
- A physical survey of the subject site (Section 4.3).
- Analysis of relevant archaeological assessments (Section 4).
- Assessment of archaeological potential (Section 5).
- Assessment of archaeological significance (Section 5.3).
- Archaeological impact assessment (Section 7).
- Provision of recommendations for the management of archaeological relics (Section 8).

1.4. AUTHORSHIP

The present report has been prepared by Ginger-Rose Harrington (Urbis Consultant Archaeologist) and Meggan Walker (Urbis Senior Archaeologist) with review and quality control undertaken by Balazs Hansel (Urbis Director, Archaeology).

Ginger-Rose Harrington holds a Bachelor of Ancient History (Archaeology) from Macquarie University.

Meggan Walker holds a Bachelor of Arts (Honours - First Class in Archaeology) from the University of Sydney.

Balazs Hansel holds a Masters (History) and Masters (Archaeology and Museum Studies) from the University of Szeged (Hungary) and is currently completing a PhD (Archaeology) at the University of Sydney.

1.5. LIMITATIONS

The HAIA was undertaken to investigate historical archaeological potential within the subject site. It does not consider Aboriginal archaeological remains or built heritage items, which are considered in separate reports.¹

¹ Urbis, 2023, *The Kings School Heritage Impact Statement*, and; Artefact, 2023, *The Kings School Aboriginal Cultural Heritage Assessment*.

2. STATUTORY CONTEXT

2.1. NATIONAL LEGISLATION

Environment Protection and Biodiversity Conservation Act 1999

In 2004, a new Commonwealth heritage management system was introduced under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The National Heritage List (NHL) was established to protect places that have outstanding value to the nation. The Commonwealth Heritage List (CHL) was established to protect items and places owned or managed by Commonwealth agencies. The Australian Government Department of Sustainability, Environment, Water, Population and Communities (DSEWPC) is responsible for the implementation of national policy, programs and legislation to protect and conserve Australia's environment and heritage and to promote Australian arts and culture. Approval from the Minister is required for controlled actions which will have a significant impact on items and places included on the NHL or CHL.

Commonwealth Heritage List

The (CHL) was established by the EPBC Act to protect Indigenous, historic, and natural heritage places owned or controlled by the Australian Government. The CHL and EPBC Act contain provisions for the management and protection of listed places under Commonwealth ownership or control. There are no items on the Commonwealth Heritage List within the study area. As such, the heritage provisions of this act do not apply, and project works for the Proposal would not require referral to the Minister.

A search of the CHL was undertaken on 10/10/2022. The subject site does not contain, nor is it located within proximity of, any items which are listed on the CHL.

National Heritage List

The National Heritage List (NHL) was established by the EPBC Act to protect places of significant natural or cultural heritage value at a National level. The EPBC Act requires NHL places to be managed in accordance with the National Heritage Management Principles. Under sections 15B and 15C of the EPBC Act, a referral must be made to the Department of the Environment and Energy for actions that are likely to have a significant impact on National Heritage listed properties. There are no items listed on the National Heritage List within the study area. As such, the heritage provisions of this act do not apply, and project works for the Proposal would not require referral to the Minister.

A search of the NHL was undertaken on 10/10/2022. The subject site does not contain, nor is it located within proximity of, any items which are listed on the NHL.

2.1.1. State Legislation

New South Wales Heritage Act 1977

The NSW Heritage Act 1977 (the Heritage Act) provides protection to items of environmental heritage in NSW. Heritage items protected under the Heritage Act include places, buildings, works, relics, moveable objects and precincts identified as significant based on historical, social, aesthetic, scientific, archaeological, architectural, cultural or natural values.

State significant items are listed on the NSW State Heritage Register (SHR) and are given automatic protection under the Heritage Act against any activities that may damage an item or affect its heritage significance. Under Section 57(1) of the Heritage Act, Heritage Council approval is required to move, damage, or destroy a 'relic' listed in the SHR, or to excavate or disturb land which is listed on the SHR and there is reasonable knowledge or likelihood of relics being disturbed.

Section 4 of the Heritage Act defines a 'relic' as:

Any deposit, object or material evidence

(a) which relates to the settlement of the area that comprises New South Wales, not being an Aboriginal settlement, and;

(b) is of State or local heritage significance.

Under Section 139(1) of the Heritage Act, an excavation permit is required to disturb or excavate 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”. Under legislative changes in 2022, a Section 139(4) may be sought for certain exempt activities which result in ground disturbance not resulting in the removal of Local or State significant relics. A Section 139(4) requires assessment by a suitably qualified archaeologist but does not require approval from Heritage NSW.

The Heritage Act requires government agencies to identify and manage heritage assets in their ownership and control. Under Section 170 of the Heritage Act, Government agencies must keep a register which includes all local and State listed items or items which may be subject to an interim heritage order that are owned, occupied or managed by that Government body. Under Section 170A of the Heritage Act all government agencies must also ensure that items entered on its register are maintained with due diligence in accordance with State Owned Heritage Management Principles.

The current HAIA has been undertaken to determine the likelihood of any local or State archaeological resources being retained within the subject site.

As the project is being assessed as an SSDA, there is no requirement for an archaeological permit under the Heritage Act to undertake work even where impact is identified as likely.

State Heritage Register

The Heritage Act is administered by the Office of Environment and Heritage. The purpose of the *Heritage Act 1977* is to ensure cultural heritage in NSW is adequately identified and conserved. Items of significance to the State of NSW are listed on the NSW State Heritage Register (SHR) under Section 60 of the Act.

A search of the State Heritage Register was undertaken on 20/08/2022. The subject site is not located within proximity of any State heritage items listed under the *Heritage Act 1977*

Section 170 Heritage and Conservation Register

The Heritage Act also requires government agencies to identify and manage heritage assets in their ownership and control. Under Section 170 of the Heritage Act, Government agencies must keep a register which includes all local and State listed items or items which may be subject to an interim heritage order that are owned, occupied or managed by that Government body. Under Section 170A of the Heritage Act all government agencies must also ensure that items entered on its register are maintained with due diligence in accordance with State Owned Heritage Management Principles.

A search of the State Heritage Inventory was undertaken on 20/09/2022. Several sites which are listed on a S. 170 Register were identified as proximate to the subject site. These are detailed below:

Table 1 – Heritage items proximate to the subject site which are listed on a S. 170 Register.

Item Name	Address	Gazette Date	Listing Type
Burnside Public School	85 Pennant Hills Road, North Parramatta NSW 2151	4/12/2019	Heritage Act - s.170 NSW State agency heritage register
Darling Mills Creek Sewage Aqueduct	Board Street, North Parramatta NSW 2151	1/01/1900	Heritage Act - s.170 NSW State agency heritage register

Environmental Planning and Assessment Act 1979

Local Environmental Plans (LEPs) are made under the *Environmental Planning and Assessment Act 1979* (EP&A Act).

Parramatta Local Environmental Plan 2023

The *Environmental Planning and Assessment Act 1979* (EP&A Act) requires each LGA to produce a Local Environment Plan (LEP). The LEP identifies items and areas of local heritage significance and outlines development consent requirements.

The subject site falls within the City of Parramatta LGA and is subject to the *Parramatta Local Environmental Plan 2023*. Under Section 5.10, Clause 2 of the *Parramatta LEP*, development consent is required when:

(c) Disturbing or excavating an archaeological site while knowing, or having reasonable cause to suspect, that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed.

Under Section 5.10, Clause 7 it is specified that:

(The) consent authority must, before granting consent under this clause to the carrying out of development on an archaeological site (other than land listed on the State Heritage Register or to which an interim heritage order under the Heritage Act 1977 applies):

(a) Notify the Heritage Council of its intention to grant consent, and

(b) Take into consideration any response received from the Heritage Council within 28 days after the notice is sent.

Historical archaeological sites are listed under Part 3 of Schedule 5 of the *Parramatta LEP*.

A search of the State Heritage Inventory was undertaken on 20/09/2022. The subject site contains a local heritage item listed under Part 1 of Schedule 5 of the *Parramatta LEP 2012* known as 'Gowan Brae Group' (Item No. I176), which includes "Gowan Brae House, Kings School Chapel, gatehouse and fence, aviary, fountain, rotunda, The Cedars", the graves of Sir James Burns and his family, "19th century driveways and stables, iron palisade fence, horseshoe bridge/dam and roadway" (Figure 18).

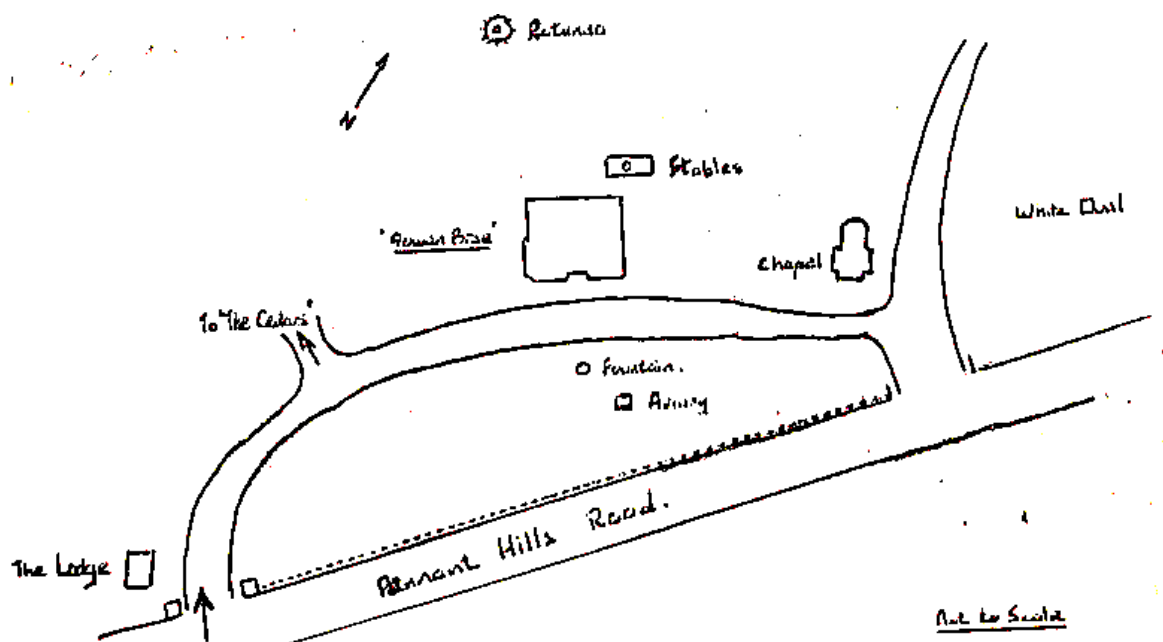


Figure 18 – Sketch map of the Gowan Brae Group included in the National Trust listing from the 4th December 1975

Source: *Gowan Brae Group – Gowan Brae House and the King's School Chapel*, The National Trust of Australia nomination for heritage listing, 4 December 1975

The subject site is also located in proximity to a number of heritage items of local significance, as identified in Table 2 below:

Table 2 - Heritage items located within proximity of the subject site – *Parramatta LEP 2012*

Item Name	Item No.	Address	Level
"Caprera House"	I154	65 Caprera Road	Local

Item Name	Item No.	Address	Level
Pye's Cottage	I157	15/3–5 Windermere Avenue	Local
“Rockcliff”	I177	224 North Rocks Road	Local
Quarry	A19	Excelsior South Reserve No 45, Excelsior Avenue	Local
Ruins of Stone Cottage	A20	Excelsior South Reserve No 45, Excelsior Avenue	Local
Dam	A21	Speers Road Crown Reserve No 37, 19–21 Speers Road	Local
Retaining Wall	A22	23-27 Speers Road	Local

2.2. NON-STATUTORY IMPLEMENTS

The Parramatta Development Control Plan 2023

The EP&A Act requires each LGA to produce a Development Control Plan (DCP). Not all LGAs provide specific development controls to protect historical archaeological resources. The subject site is subject to the Parramatta City Council DCP, within which Part 7 addresses Heritage and Archaeology. General provisions relating to archaeology are addressed in Section 7, Part 7 of the DCP. This includes controls relating to the development of sites within the bounds of the Parramatta Historical Archaeological Land Management Study (PHALMS), which the subject site does not form part of, and areas outside of the PHALMS study. Outside of the PHALMS study area, the following controls apply:

To ensure that development is undertaken in a manner that clearly identifies and protects sites of archaeological significance.

In order to meet this objective, the DCP references the *Parramatta LEP 2012*. As the subject site is included in this LEP, its management procedures must consider the following development controls:

3 If necessary, the applicant shall, prior to any excavation work commencing, make an application to the NSW Heritage Office for an application permit under the terms of the Heritage Act 1977. The applicant shall allow sufficient time and resources for the determination of the application and for completion of the archaeological programme required.

C.04 At all times when excavation is being carried out, the applicant (or any persons acting for the applicant) should be aware of any excavation permit requirements including the need for monitoring, stopping work and reporting any relics found to the NSW Heritage Office.

C.05 Works, including landscaping and associated elements, should be located away from sites and potential sites containing archaeological relics.

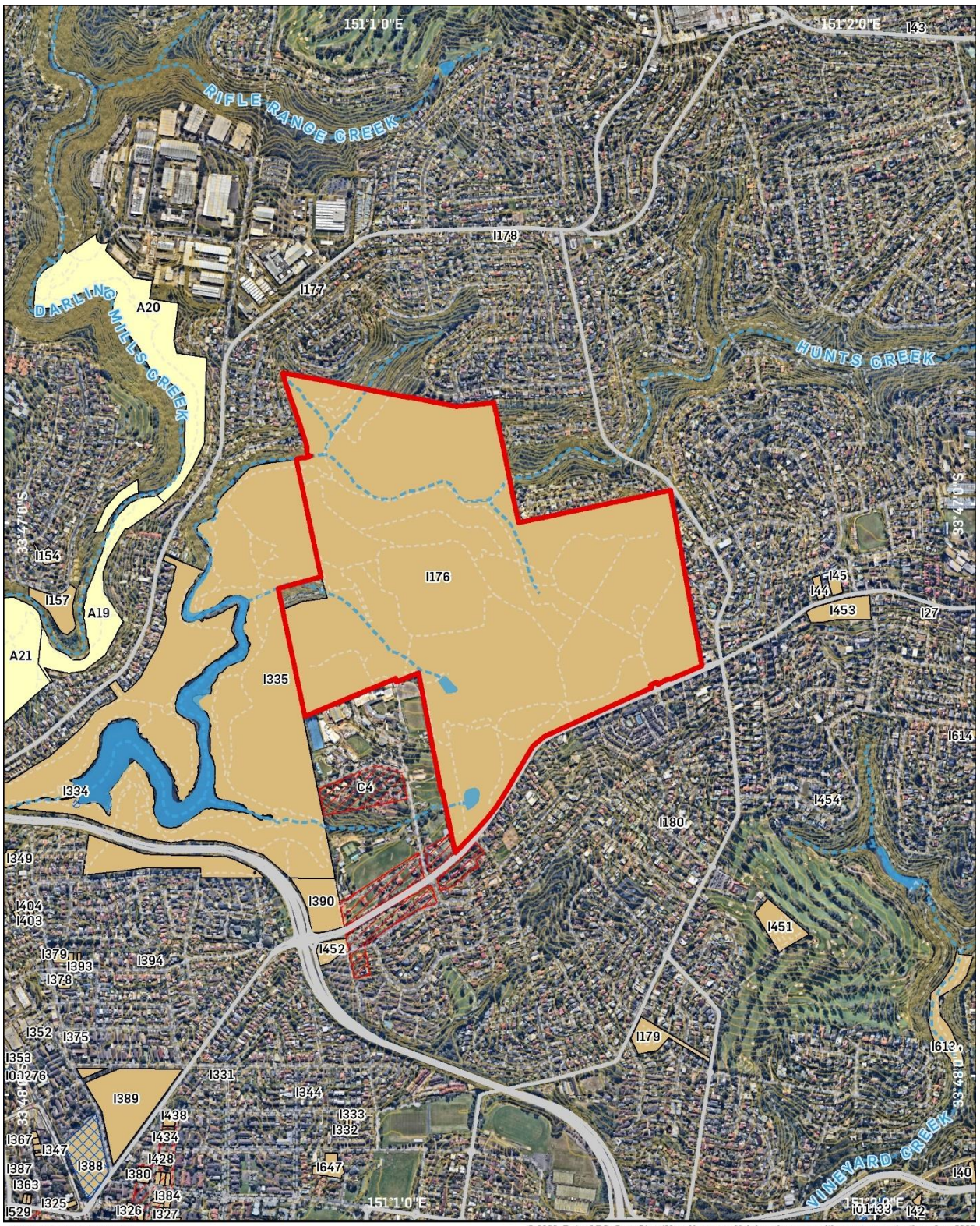
C.06 The depth and extent of excavation should be minimised where land contains, or is likely to contain, archaeological remains or relics.

Despite its entry under Schedule 5 of the *Parramatta LEP 2012* as Item No. I176, being “Gowan Brae Group”, the subject site is not listed as an ‘archaeological site’. Nonetheless, as the proposed works are submitted under a State Significant Development Application (SSDA), in order to respond to the expected Secretary’s Environmental Assessment Requirements (SEARs), and the need to assess the potential impact of works to items of built heritage significance, a Historical Archaeological Impact Assessment (HAIA) is required for the subject site.

2.3. SUMMARY OF HERITAGE CONTEXT

The statutory context of the subject site is summarised as follows:

- The subject site does not contain, nor is it located within proximity of, any items which are listed on the CHL, NHL or SHR.
- The subject site is located within proximity of two items which are listed on a S.170 Register. These are the Burnside Public School (located at 85 Pennant Hills Road, North Parramatta NSW 2151) and the Darling Mills Creek Sewage Aqueduct (located at Board Street, North Parramatta NSW 2151).
- The subject site is listed on the Parramatta LEP 2012 as Item No. I176, Gowan Brae Group". While this is not an archaeological listing this does afford protection to the site under the LEP and the non-statutory controls of the DCP.



GDA 1994 MGA Zone 56

© 2022. Data: ABS, OpenStreetMap, Neamap. Helping shape our cities, one map at a time. Aug 2022



Project No: P0034369
 Project Manager: Meggan Walker

HISTORICAL HERITAGE ITEMS

The Kings School SSDA (TKS SSDA)
 TSA Management on behalf of The Kings School

- Subject Area
- Hydrology
- Conservation Area - General
- Item - Archaeological
- State Heritage Register
- Contours
- Item - General

Figure 19 – Heritage Items Near the Subject Site

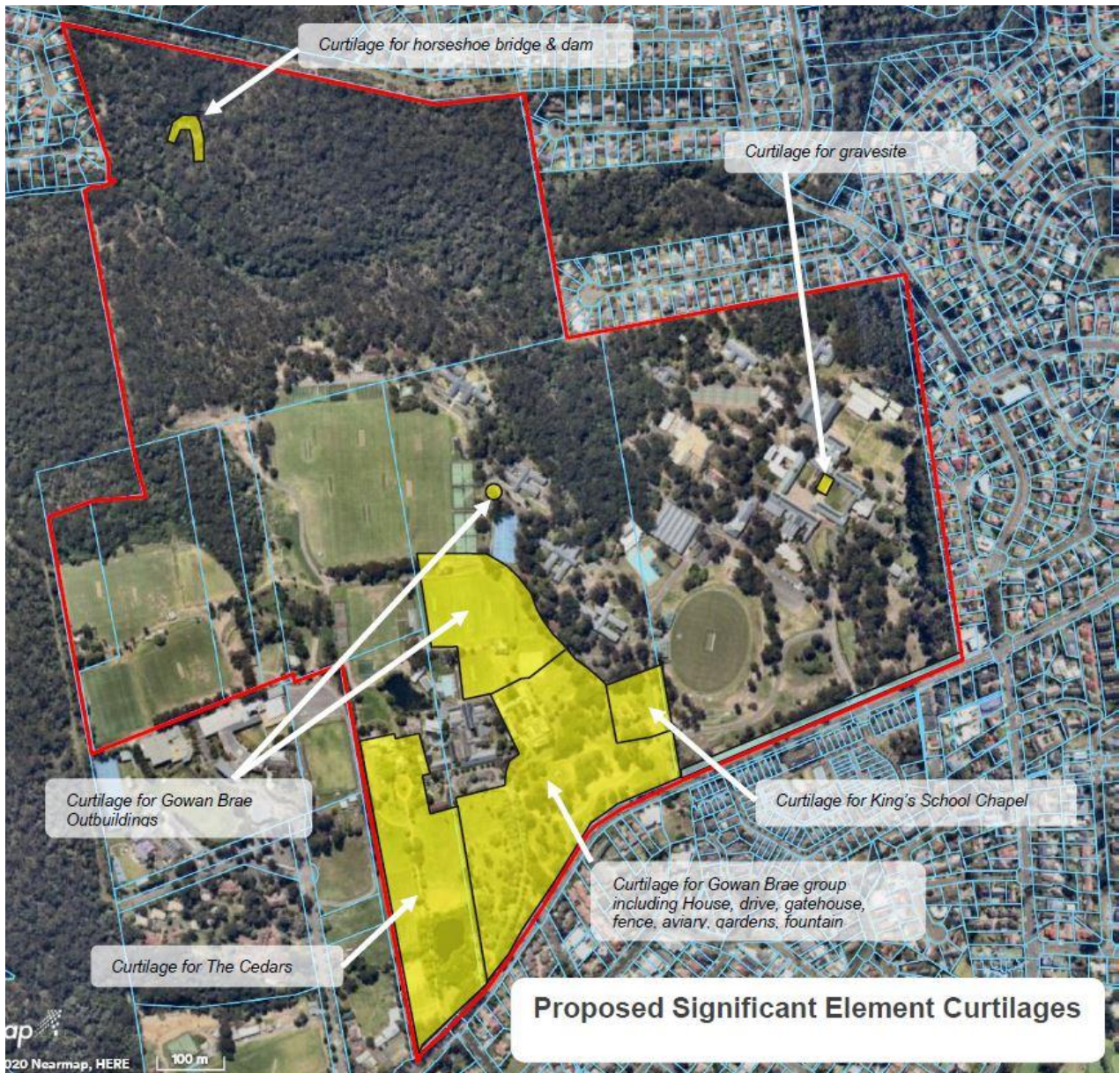


Figure 20 – Curtilage analysis for individual elements and groups of elements proposed in the Heritage Impact Statement for the Kings School (2020).

Source: Nearmap (2020) & Urbis (2020).

3. HISTORICAL CONTEXT

The history of the subject site has been extracted from the Heritage Assessment for the subject site, which was prepared by Urbis.² Additional history has been supplemented where relevant.

The historical context of the subject site provides the basis for assessing what may be retained in the ground as archaeological evidence of past development. The following description is based on archival source material and provides an overview of the phases of site development, which includes the nature, character and distribution of historical land use and associated ground disturbance.

The historical context is discussed according to the following development and use phases:

- Phase 1: **Early Land Grants, 1792-1839** (Section 3.1.1).
- Phase 2: **Sir James Burns and Gowan Brae, 1886-1925** (Section 3.1.2).
- Phase 3: **Future Acquisition(s) of Gowan Brae, 1925-1955** (Section 3.1.3).
- Phase 4: **Opening of the Kings Senior School, 1962-Present** (Section 3.1.4).

3.1.1. Phase 1: Early Land Grants, 1792-1839

Historical mapping demonstrates that the lots comprising the modern building footprint of the Kings School were not granted until at least 1790, after the original Parramatta land grants had been allocated (cf. Figure 21). As such, the majority of the land which today constitutes the King’s School site was originally granted to discharged soldiers of the Corps by various colonial Governors between 1790-1830s. These original land grants included the following table (Table 3). Several maps indicate the expanse of these original land grants over time (for example, cf. Figure 21, Figure 22 and Figure 24).

Table 3 – Original grants

Name	Portion	Grantee	Occupation	Date Granted	Comments
Governor’s Arms	4	Josiah James	Discharged soldier NSW Royal Veteran Corps	1 July 1839	-
Northern Farms	115	Daniel Spencer (later purchased by Joseph Holt)	-	29 October 1793	Joseph Holt combined the two holdings on 15 September 1803 and named the property Northern Farms
	116	John Randal (later re-granted to Joseph Holt)	-	29 November 1792	
George Barrington’s Holding	103	George Barrington	Chief Constable and Superintendent of convicts	29 September 1792	Barrington was an Irish convict who was freed by Governor Phillip. Governor Hunter made him Chief Constable and Superintendent of convicts.
Rockcliff	155	William Yates (originally promised to David Nairn)	-	1 July 1839	Yates built Rockcliff cottage in 1856.

² Urbis, 2020. The Kings School, North Parramatta SSD-48497708.

Name	Portion	Grantee	Occupation	Date Granted	Comments
Orange Grove	154	John and Thomas Hackett	-	19 October 1831	-

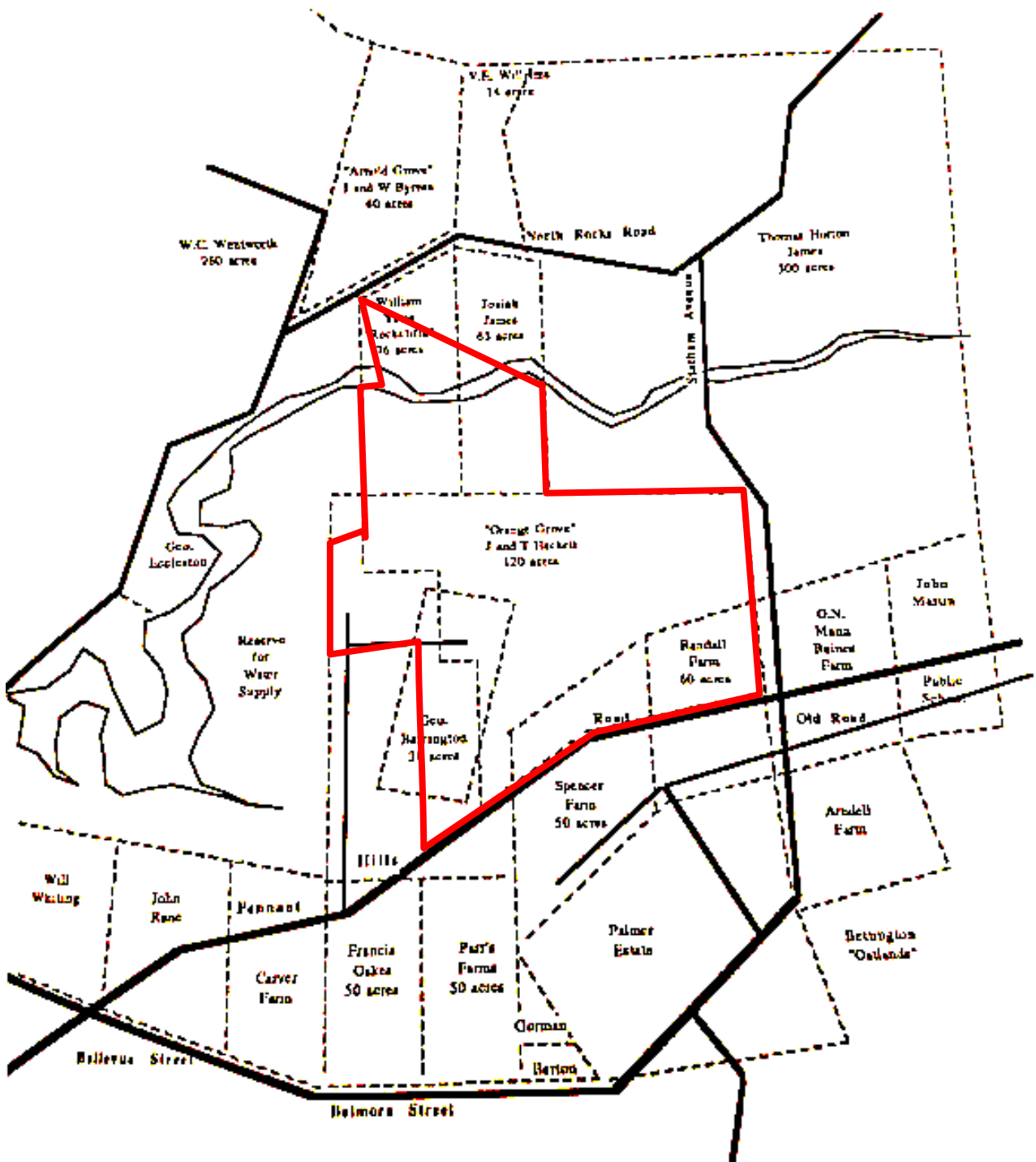


Figure 21 – Earliest land grants within The King's School site

Source: Hilliard, B. 1989. *Gowan Brae – the First 100 Years: 1889-1989*, p.59

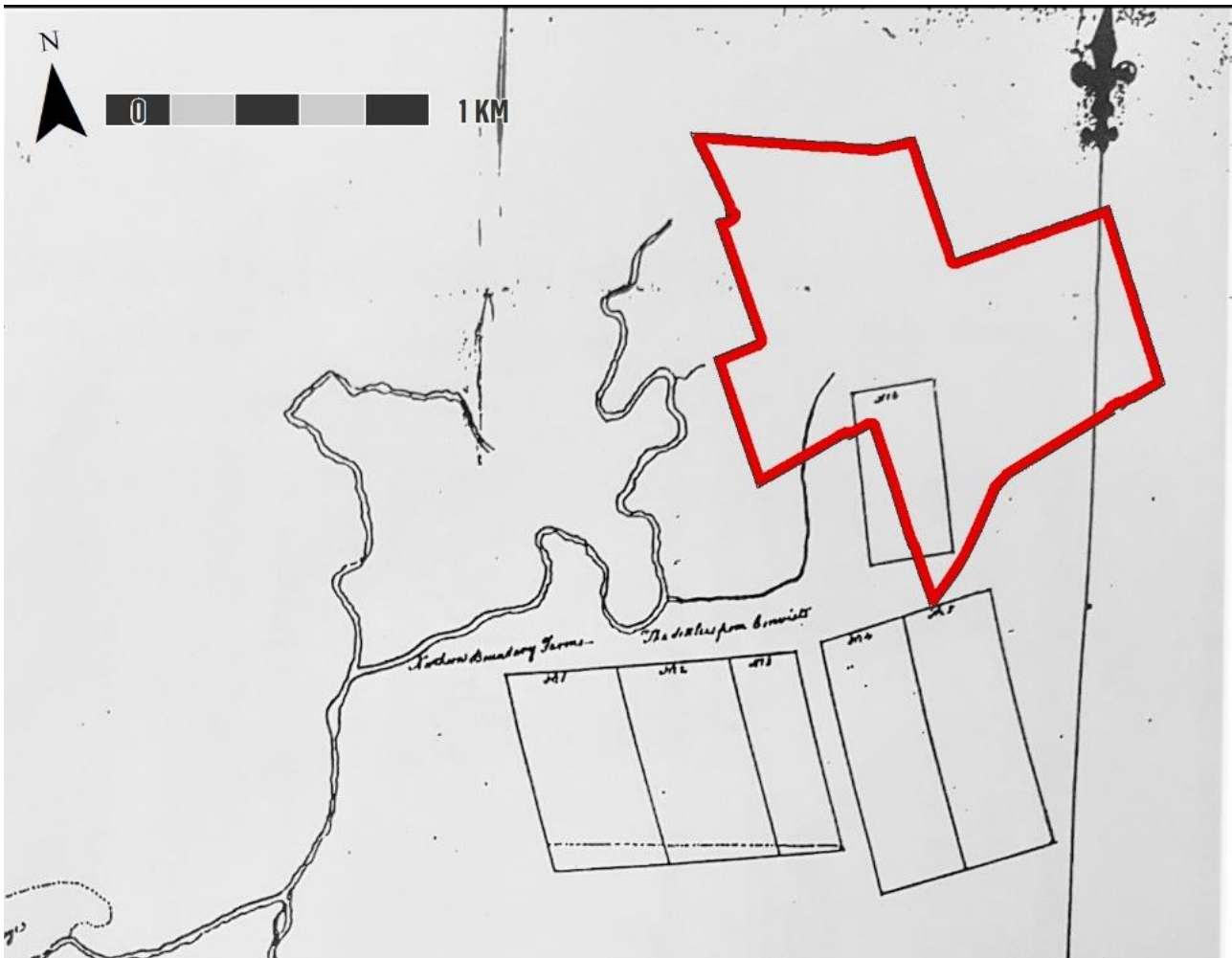


Figure 22 – Earliest known map of Parramatta area (1789-90) indicating that the land within The King’s School site had not been granted at this time

Source: State Library of NSW, Bonwick Transcripts, J. McClymont Map

Evidence of the division of land in the form of fence or survey lines is unlikely to survive at the site due to subsequent disturbance and the ephemeral nature of such evidence, with fences likely to have been timber and as such degraded. By c.1839, when these original land grants had been distributed, the properties likely began to be developed and occupied in ways which would have imprinted a less ephemeral archaeological footprint on the landscape. The usage of each land pocket may be inferred by their owners and names.

Portion 4 was allocated to Josiah James on 1 July 1839. It appears to have formed part of a broader complex of allotments named “Governor’s Arms” and “Owen’s Farms”, which is documented as farmland as early as 1841. In one advertisement in *The Sydney Monitor and Commercial Advertiser* from the same year, the Governor’s Arms is described as being 110 acres in area, bounded by “the several farms and lands of Messrs. Elder, Smith, Grose, and Mobbs”. The farmland, itself, is described as having:

A great portion...under cultivation; has a never failing supply of excellent water, on which the surrounding district chiefly depended last dry season. A small cottage, with barn and stable, and an orchard has been formed, with a choice collection of fruit trees, at a very considerable outlay. It is well suited for an industrious family from the abundance of timber for building purposes.³

³ *The Sydney Monitor and Commercial Advertiser*, 11 October 1841, p. 4.

<https://trove.nla.gov.au/newspaper/article/32190966?searchTerm=%22Owen%27s%20Farm%22%20Pennant%20Hills>

This advertisement demonstrates that by the mid-19th century the allotments were improved upon, with dwellings as well as outbuildings and farmlands. Such resources could be retained in a subsurface capacity at the site.

By 1852, when the acreage was again advertised as for sale in *The Sydney Morning Herald*, further details are provided about the usage of the farmland, which is indicative of the archaeological resources that may be preserved on the site. The advertisement specifies that the Governor's Arms contained several smaller Veteran's allotments - such as, potentially, Josiah James' land.⁴ One such veteran, named Thomas Blake, appears to have published a "caution to the public" in the same year, specifying the installation of fences across his allotment:

Having purchased the 140 acres of land at the Pennant Hills, formerly known as "Owen's Farm", and the Governor's Arms, I hereby caution parties against trespassing thereupon, cutting or removing timber, and destroying the fences, otherwise they will be prosecuted according to law.⁵

It is likely that other allotments were utilised in a similar manner throughout this period, with boundaries established to protect agricultural pursuits. Fences were probably constructed of timber and, due to the cursory nature of this material, are likely represented in the archaeological record in the form of ephemeral remains such as linear alignments of post holes. Additional ephemeral evidence of orcharding or else cropmarks indicative of agricultural activity may also be present at the site. However, the pattern and clarity of postholes or other such ephemeral evidence of agricultural works may be disturbed or entirely removed by subsequent development. Less sensitive archaeological remains (such as brick or sandstone foundational structural remains of cottages and outbuildings) are more likely to be retained, should such developments have been present at this time. As there are references to cottages at Governors Arms and Rockcliff, it is likely that the allotments encompassed an agricultural and residential function. The presence of such structural remains is, therefore, possible throughout the site. However, due to the absence of maps it is difficult to know the exact location of former residences associated with the allotments.

James' usage of the subject site is likely to resemble Blake's. This is conceivable on account of the broader usage of the landscape for agriculture during this phase (see below). As such, one may presume that the subject site may retain ephemeral remains of agriculture and some structural remains, however difficult to identify and attribute to a particular individual's occupation of the site.

The land grants to the south of the Governor's Arms and Rockcliff likely served a similar function to James' allotment. Portion 115, later named "Northern Farms", was allocated to Daniel Spencer on 15th September 1803. Although it is difficult to ascertain the site's usage at the time of its allocation, the land is described as "One of the Northern Boundary Farms" in the grant index for the year 1793.⁶ The allotment also receives a similar designation in the original deed presented to Spencer, naming the land "Spencer's Farm".⁷ Portion 116, which also formed part of the later "Northern Farms", was allocated to John Randal on 29th November 1792. Like with Spencer's land grant, portion 116 is described in the 1992 grant index as being "Near the Northern Boundary Farms".⁸ The corresponding deed also names the allotment "Randal's Farm", specifying, as with Spencer's land, that its occupants were to:

Reside within the same and proceed to the improvement and cultivation thereof, such timber as may be growing or to grow hereafter upon the said land which may be deemed fit for Naval Purposes to be reserved for the use of the crown.⁹

⁴ *The Sydney Morning Herald*, 13 August 1852, p. 4

<https://trove.nla.gov.au/newspaper/article/12939158?searchTerm=Pennant%20Hills%20Owen%27s%20Farm%20Governor%27s%20Arms>

⁵ *The Sydney Morning Herald*, 6 September 1852, p. 3.

<https://trove.nla.gov.au/newspaper/article/12939755?searchTerm=Pennant%20Hills%20Owen%27s%20Farm%20Governor%27s%20Arms>

⁶ HLRV, County of Cumberland, Parish of the Field of Mars, 1 1792-1826 S.

⁷ HLRV, County of Cumberland, Parish of the Field of Mars, 1 63 1792-1794.

⁸ HLRV, County of Cumberland, Parish of the Field of Mars, 1 1792-1826 R.

⁹ HLRV, County of Cumberland, Parish of the Field of Mars, 1 47 1792-1794.

As is evident from these descriptions, the lands granted were intended to be both residential and agricultural allotments, providing soldiers with an opportunity to live and work on the land. Joseph Holt combined the two holdings on 15 September 1803 and named the property Northern Farms, from which one may infer the site's enduring agricultural use at this time.¹⁰ By 1882, some clarity is brought to the usage of the former Northern Farms, when a north-western portion of the site is advertised to be for auction. At this time, the site appears to have been subdivided and used as orchards and parklands.

Portion 154, "The Orange Groves", was granted to John and Thomas Hackett on 19th October 1831. The site appears to have functioned as an orchard at this early time, which is reflected in its designation as a 'grove' in the original deed.¹¹ This appears to have endured until, at least, 1882, when the property is described as "Hackett's Orchard".¹²



Figure 23 – Front elevation of 224 North Rock Road, North Rocks 2151 "Rockcliff". Note the building materials, which include a sandstone cottage and retaining wall, timber detailing and picket fence, and tin roofing.

Source: Google Maps, 2022.

Portion 155, named "Rockcliff", was allocated to William Yates on 1 July 1839; although, it is recognised in earlier maps as having been previously allocated to David Nairn (Figure 24). In explanation of this change of ownership, the deed received by Yates in 1839 documents how:

Being the land promised to David Nairn on or before the [12th July], and of which he was authorised to take possession on the 31st December 1832, as a Disbanded Soldier from the New South Wales Royal Veteran Corps; being also the land advertised as no. 136 in the Government Notice dated to 30th March 1839, in favour of the said William Yates at the request of the promisee.¹³

¹⁰ HLRV, County of Cumberland, Parish of the Field of Mars, 3 116 1800-1809

¹¹ HLRV, County of Cumberland, Parish of the Field of Mars, 30 79.

¹² SLNSW, IE9142955.

¹³ HLRV, County of Cumberland, Parish of the Field of Mars, 58 243.

The land parcel, itself, is also given the name “Rockcliff” in this deed.¹⁴ Yates erected “Rockcliff Cottage” within the bounds of this grant (outside the curtilage of the subject site) in 1856, which remains to the present day at the address 224 North Rocks Road, North Rocks 2151 (Figure 23).¹⁵ Rockcliff is a house of sandstone and timber construction, with sandstone retaining wall and timber picket fence. Alterations to Rockcliff have been minor in nature and as such it provides an example of what contemporary agricultural cottages in the subject site may have been like with regard to construction, layout and materiality.

During this phase, the subject site was variously developed into farmstead style properties under the ownership of the discharged soldiers, functioning for both residential and agricultural purposes and allowing soldiers to both work and live on the land. Archaeologically, ephemeral evidence of agricultural pursuits including post holes from fences or timber structures, or else evidence of orcharding, is unlikely to survive with a suitably high degree of integrity to be legible and definitively attributed to this phase. However, structural remains of residential dwellings are more likely to be retained with partial integrity, as well as evidence of deep features such as potential cesspits or wells. The remaining cottage Rockcliff, outside of the subject site, provides an example of the typical residential cottages of the time, being sandstone in construction with potential that sandstone foundations of similar cottages could occur at the site.



Figure 24 – Undated map of the Cumberland area with the subject site outlined in red, anticipated to be early 19th century due to the nature of the allotments. Note the former allocation of portion 155 to David Nairn.

Source: *The Original Archives Office of the New South Wales, Map No. A0215*

3.1.2. Phase 2: Sir James Burns and Gowan Brae, 1886-1925

The site of Gowan Brae was established by Sir James Burns in 1886, after migrating to Australia in 1862. After the death of his father in 1870, Burns’ mother, sister and two brothers also settled in Australia.

Burns was a businessman, shipowner and philanthropist born on 10 February 1846 in Polmont, Stirlingshire. In 1875 he married his first wife, Mary Susan (nee Ledingham) who died the following year after giving birth to a baby girl. Burns married his second wife, Mary Heron Morris, in 1880 and they had three sons and two daughters. His youngest son Robert died in the First World War and son John died of tuberculosis while on

¹⁴ HLRV, County of Cumberland, Parish of the Field of Mars, 58 243.

¹⁵ Hilliard, B. 1989. *Gowan Brae – the First 100 Years: 1889-1989*, pp. 58-59.

the Australian Light Horse campaign in Mesopotamia. Burns later also died at Gowan Brae in 1923 of stomach cancer. The graves of James Burns and his family are located within the grounds of the Senior School (Figure 25, Figure 26 and Figure 27) where they were originally interred.



Figure 25 – Grave of Sir James Burns (left) and eldest son James Burns (right)



Figure 26 – Gravesite



Figure 27 – Grave of Caroline Herron McFerran (left)

Burns settled at Gowan Brae in the late 1880s with his wife Margaret Burns, nee Shiress, and son David Burns. Land titles records indicate that Burns purchased Lot 1 DP 57491 (Table 4) and Lot 10 DP 812772 (Table 5) on 13 May 1889; although, in the course of the 35 years in which Burns lived at Gowan Brae, he purchased a total of 304 acres.

Table 4 – Lands Titles Records – History of Lot 1 DP 57491

Date	Owner	Land Area
13 May 1889	Mary Heron Burns	3 acres, 4 perches (portion 154 originally granted to John and Thomas Hackett) ¹⁶
21 August 1889	James Burns	68 acres, 10 perches (portion 154 originally granted to John and Thomas Hackett and portion 115 originally granted to Joseph Holt) ¹⁷
19 November 1908	James Burns	19 acres, 2 roods, 28 perches (portion 103 originally granted to George Barrington and Portion 154 originally granted to John and Thomas Hackett) ¹⁸
4 November 1909	James Burns	24 acres, 32 ½ perches (portion 3 originally granted to William Yates) ¹⁹
24 April 1914	James Burns	130 acres, 34 ¾ perches (portion 3 originally granted to William Yates, portion 4 originally granted to Joseph James) ²⁰
16 October 1916	James Burns	236 acres, 3 roods, 18 ¼ perches ²¹
24 March 1925	James Burns & Robert John Nosworthy	Become joint tenants of 236 acres, 3 roods, 18 ¼ perches ²²
27 March 1925	Presbyterian Church of Australia and state of NSW	236 acres, 3 roods, 18 ¼ perches ²³
13 August 1954	The Council of the King's School	236 acres, 3 roods, 18 ¼ perches ²⁴

Table 5 — Lands Titles Records – History of Lot 10 DP 812772

Date	Owner	Land Area
13 May 1889	Mary Heron Burns	3 acres, 4 perches (portion 154 originally granted to John and Thomas Hackett) ²⁵
21 August 1889	James Burns	68 acres, 10 perches (portion 154 originally granted to John and Thomas Hackett and portion 115 originally granted to Joseph Holt) ²⁶
19 November 1908	James Burns	19 acres, 2 roods, 28 perches (portion 103 originally granted to George Barrington and Portion 154 originally granted to John and Thomas Hackett) ²⁷

¹⁶ *Certificate of Title*, Vol. 922 Fol. 171.

¹⁷ *Certificate of Title*, Vol. 936 Fol. 153.

¹⁸ *Certificate of Title*, Vol. 1926 Fol. 98.

¹⁹ *Certificate of Title*, Vol. 2012 Fol. 204.

²⁰ *Certificate of Title*, Vol. 2466 Fol. 106.

²¹ *Certificate of Title*, Vol. 2707 Fol. 43.

²² *Certificate of Title*, Vol. 2707 Fol. 43.

²³ *Certificate of Title*, Vol. 2707 Fol. 43.

²⁴ *Certificate of Title*, Vol. 2707 Fol. 43.

²⁵ *Certificate of Title*, Vol. 922 Fol. 171.

²⁶ *Certificate of Title*, Vol. 936 Fol. 153.

²⁷ *Certificate of Title*, Vol. 1926 Fol. 98.

Date	Owner	Land Area
4 November 1909	James Burns	24 acres, 32 ½ perches (portion 3 originally granted to William Yates) ²⁸
24 April 1914	James Burns	130 acres, 34 ¾ perches (portion 3 originally granted to William Yates, portion 4 originally granted to Joseph James) ²⁹
18 July 1914	James Burns	304 acres, 3 roods, 28 ¼ perches ³⁰
16 October 1916	James Burns Junior	68 acres, 10 perches ³¹
19 September 1929	Trustees of the Presbyterian Church of Australia	68 acres, 10 perches ³²
13 August 1954	Council of the King's School	68 acres, 10 perches ³³

Burns commenced work on Gowan Brae House in 1886 and finished in 1889. The residence and associated structures (Figure 28-Figure 29) were constructed during this period to reflect his passion for Hawkesbury sandstone as a building medium. The sandstone was quarried from Hunt's Creek, which runs through the western component of The King's School site. Gowan Brae House was designed by renowned architect of the day, Cooper Day. The original plan consisted of a U-shaped structure with an asymmetrically positioned square tower (Figure 30). Construction associated with this original design is distinguishable by the sandstone's fine surface treatment.

Archaeological evidence associated with Gowan Brae is unlikely to occur, as the property is still standing in the present day and previous works associated with development on the site have resulted in the removal of underfloor deposits.

²⁸ *Certificate of Title*, Vol. 2012 Fol. 204.

²⁹ *Certificate of Title*, Vol. 2466 Fol. 106.

³⁰ *Certificate of Title*, Vol. 2493 Fol. 169.

³¹ *Certificate of Title*, Vol. 2707 Fol. 37.

³² *Certificate of Title*, Vol. 2707 Fol. 37.

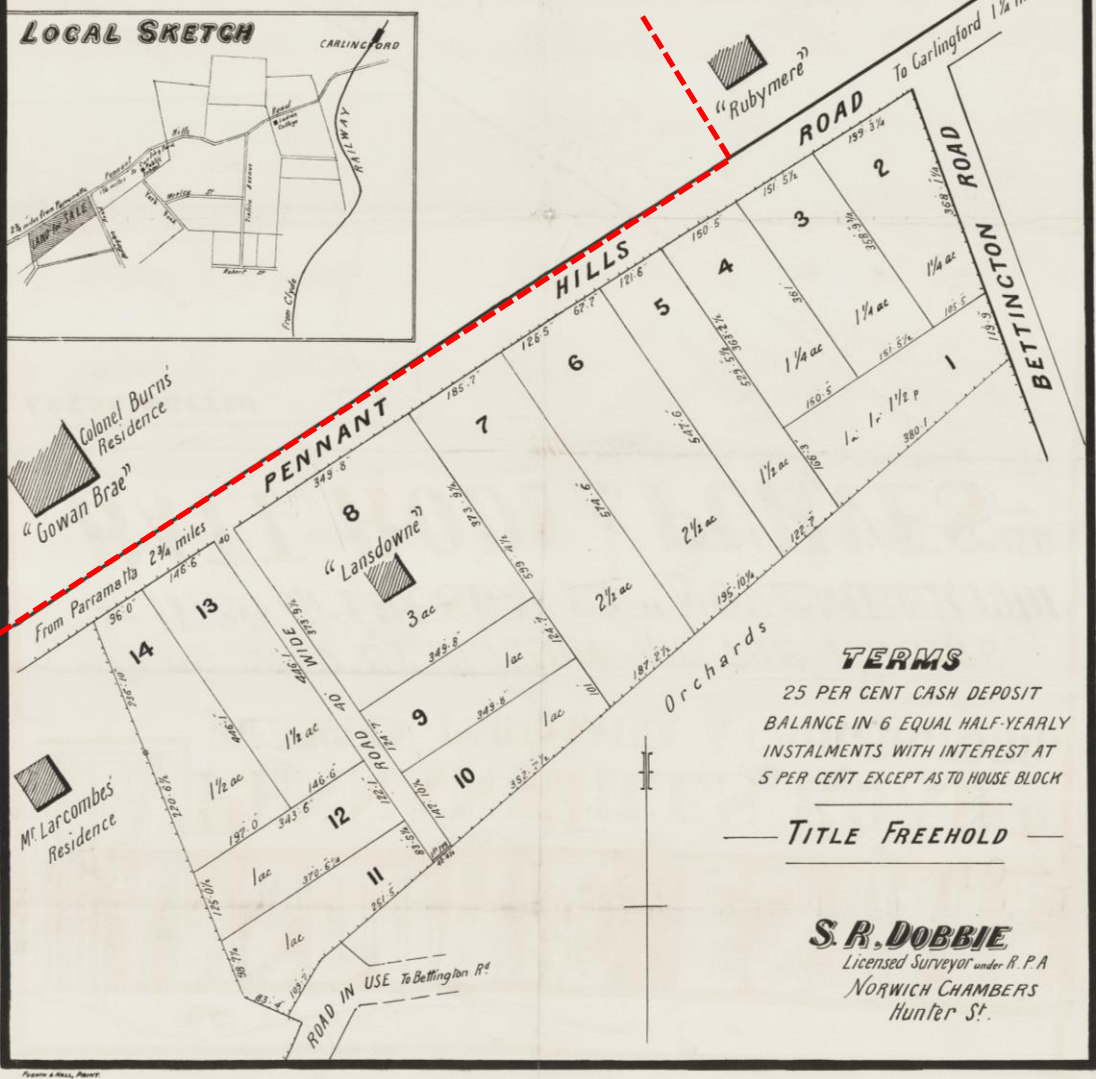
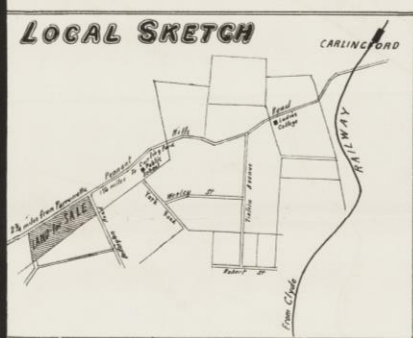
³³ *Certificate of Title*, Vol. 2707 Fol. 37.

LANSDOWNNE ESTATE

PENNANT HILLS ROAD

BETWEEN PARRAMATTA & CARLINGFORD

TO BE SOLD BY AUCTION AT THE ROOMS
 AT 11.30 ON TUESDAY 12TH NOVEMBER 1901
BATT, RODD & PURVES LTD
 AUCTIONEERS



TERMS

25 PER CENT CASH DEPOSIT
 BALANCE IN 6 EQUAL HALF-YEARLY
 INSTALMENTS WITH INTEREST AT
 5 PER CENT EXCEPT AS TO HOUSE BLOCK

TITLE FREEHOLD

S. R. DOBBIE
 Licensed Surveyor under R. P. A.
 NORWICH CHAMBERS
 Hunter St.

Figure 28 – 1901 subdivision plan with south-eastern boundary of The King's School site indicated in red. Note the location of Gowan Brae residence to the left-hand site of the map.

Source: NLA, FL6975619



Figure 29 – Overview of the Kings School campus, showing (highlighted in red) the structural and landscaping developments made to the area in association with Sir James Burns' occupation of the site.

Source: Nearmap (2021) & Urbis (2022).

A Fernery, consisting of large rough-cut sandstone columns also extended from the north-west of the residence. Although not included in Gowan Brae's original floor plans (Figure 30), the Fernery appears to have been constructed by, at least, 1895 (Figure 31). All that now remains of the structure is an enclosed courtyard surrounded by a 2-course sandstone boundary wall. It is difficult to discern at what time the Fernery was dismantled; although, this may have taken place as part of the renovations to Gowan Brae that began in 1904. During these works, a large billiard room and trophy room with an enclosed glass skylight (now the meeting room and recreation room respectively) were constructed between the wings of Gowan Brae House (Figure 32). The 1904 additions to Gowan Brae House were constructed with rough cut sandstone, which, like the extant foundations of the Fernery, can clearly be differentiated from the clean chiselled sandstone of the original residence. The potential for any demolition material associated with the Fernery to be preserved on site is uncertain, due to later construction works undertaken by the Australian Army during the 1940s, both on Gowan Brae House and the land that extends between its northern facade and the Stables.

The Stables (Figure 33) and Gatehouse (Figure 34) were constructed shortly after the completion of Gowan Brae House in 1889 (cf. Figure 29).

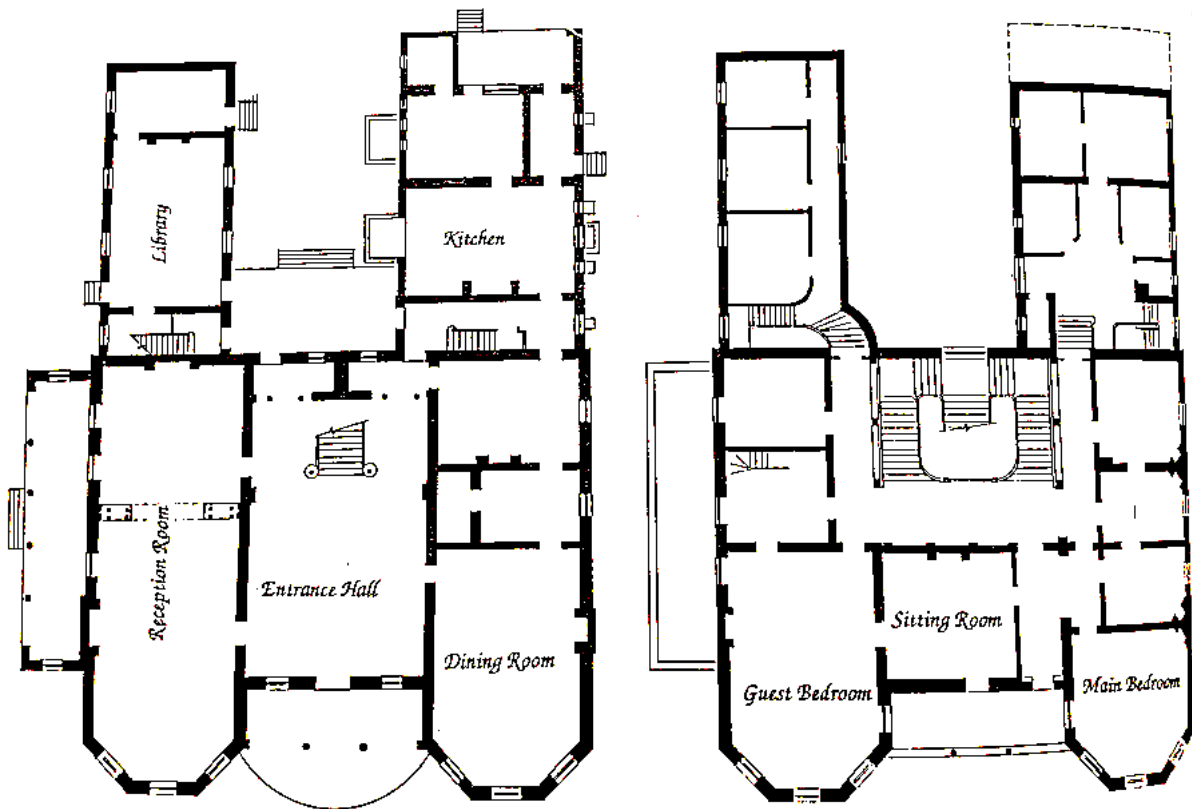


Figure 30 – Original floor plan of Gowan Brae House

Source: Hilliard, B. 1989. *Gowan Brae – the First 100 Years: 1889-1989*, p.64

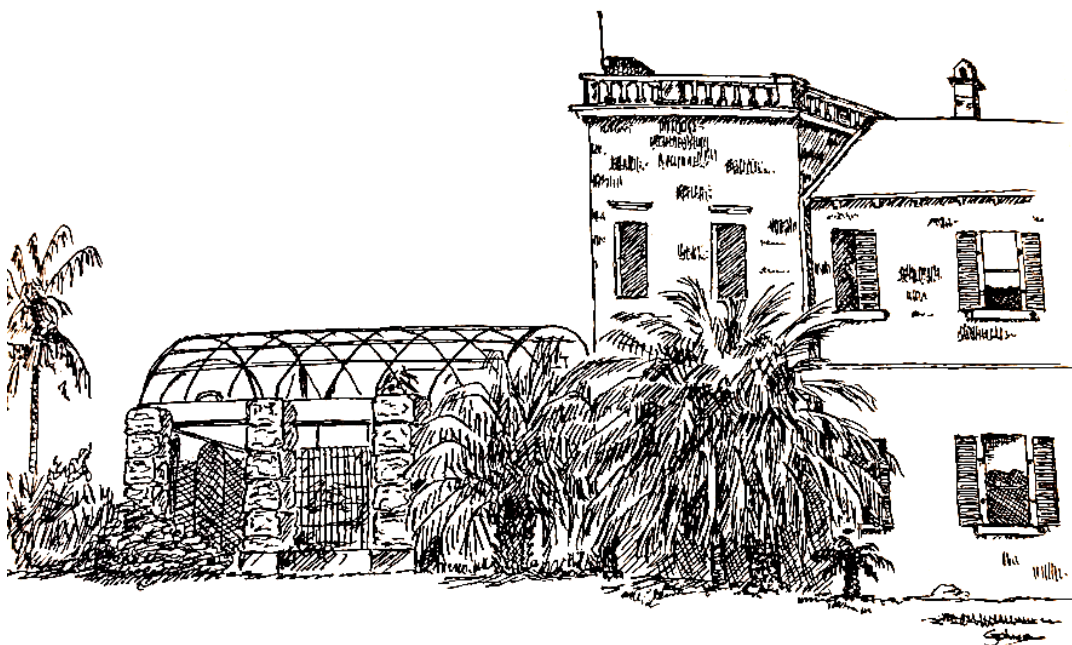


Figure 31 – Western wing of Gowan Brae and the Fernery, c.1895

Source: Hilliard, B. 1989. *Gowan Brae, the First 100 Years: 1889-1989*, p.5

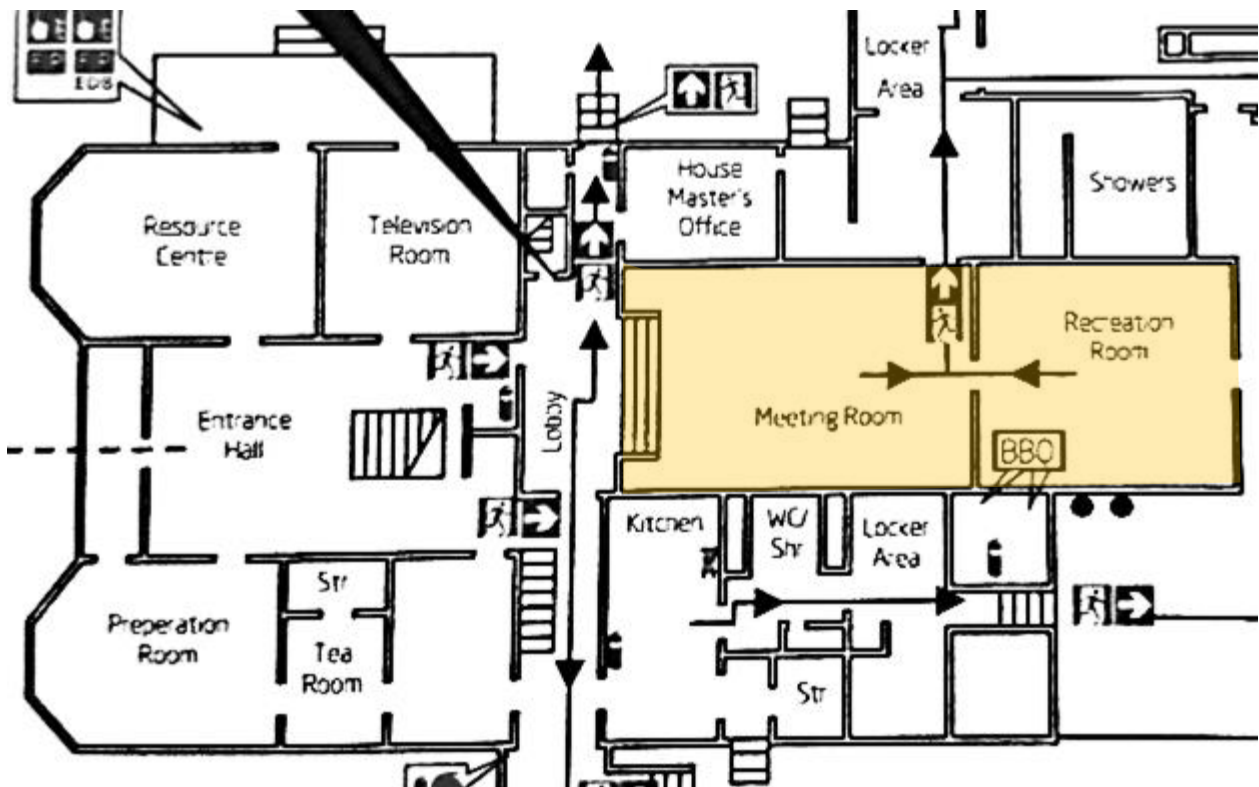


Figure 32 – Floor plan of Gowan Brae House with 1904 additions highlighted

Source: *Urbis* (2020).



Figure 33 – The Stables, c.1898

Source: *Hilliard, B. 1989. Gowan Brae, the First 100 Years: 1889-1989, p.21*

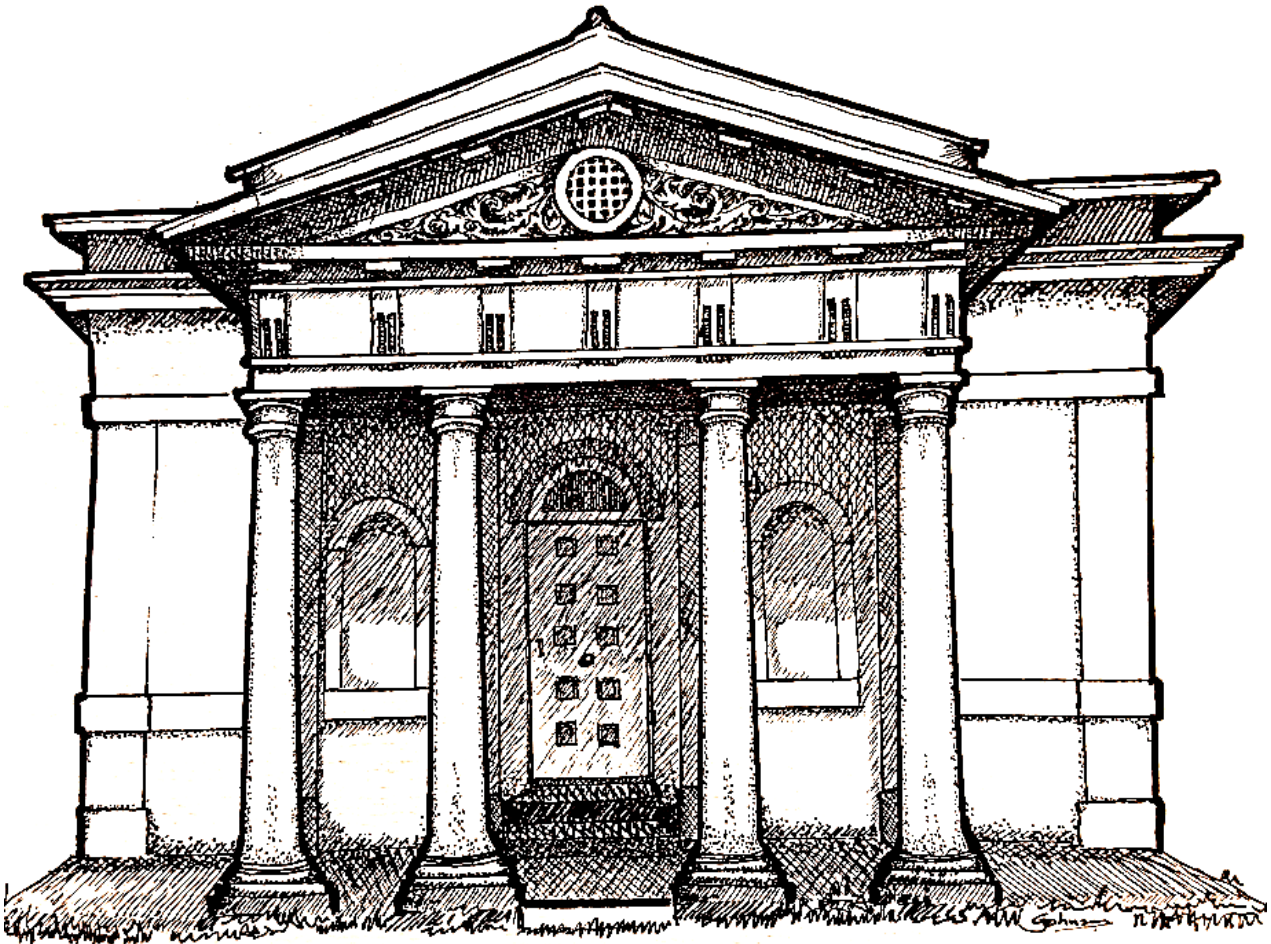


Figure 34 – The Gatehouse

Source: Hilliard, B. 1989. *Gowan Brae, the First 100 Years: 1889-1989*, p.51

3.1.3. Phase 3: Changing uses of Gowan Brae, 1925-1955

Upon his passing, Burns' Estate included bequests to the Burnside Orphan Homes, the Presbyterian Church and colleges, various hospitals and the Salvation Army. From 1925, a number of proposals were put forward for the future use of the Gowan Brae property. These included a retired ladies' home, a rural school and a grammar school.

The Burnside Homes were founded in 1910 and, over time, came to house and educate over 500 children. The first of the Burnside Orphan Homes was erected in 1910, designed by a Mr McCreddie and Anderson.³⁴ By 1928, the Homes were reported to include 24 separate buildings, including a mixture of residential buildings, places of worship, classrooms and an assembly hall;³⁵ although, only 3 are documented to have encroached upon the subject site (Figure 35 and Figure 36). The design for the broader campus was devised in a 1917 competition concerning the proposed layout of the new property. Although the existing state of the property at that time is not expressly commented upon, the conditions for the competition included several controls concerning the existing topography:

³⁴ *Dun's Gazette* for New South Wales, 7 November 1910, p. 339. <https://nla.gov.au/nla.obj-788335711/view?sectionId=nla.obj-796711541&searchTerm=%22Burnside+Orphan+Homes%22&partId=nla.obj-788352370#page/n1/mode/1up>

³⁵ *Building : the magazine for the architect, builder, property owner and merchant*, 12 January 1929, pp. 49-52. <https://nla.gov.au/nla.obj-344004718/view?sectionId=nla.obj-350580684&searchTerm=%22Burnside%22+Homes&partId=nla.obj-346350570#page/n52/mode/1up/search/%22Burnside%22+Homes>

- Provisions for several cottages “of a similar to the type as shown in existence at the present Homes”, in addition to an Assembly Hall, Staff Residence and Storeroom, Caretaker’s cottage.
- Provisions for a “convenient approach” to each cottage for vehicular traffic.
- The layout should utilise the existing topography of the site, with a focus on its recreation and other grounds, including “flower and vegetable gardens”.

Responses to were received and published on 20th January 1919 from a Mr Joseland, who proposed the accepted design, and the architects of the former establishment, Mr McCredie and Anderson.³⁶

Having received a portion of land that formerly comprised part of the Hacketts’ Orange Grove, the Burnside Orphan Homes included expansive recreational and agricultural grounds. As such, a significant component of the students’ education was agricultural, utilising the vegetable and cereal crops, as well as livestock, to train their young male residents for a life on the land. Although most agricultural pursuits appear to have centred on the land to the south of Pennant Hills Road, archival imagery demonstrates the continued use of the land to the east to Masons Drive and north of Gowan Brae, which the Homes acquired in 1932,³⁷ for crops and livestock (Figure 35). Nonetheless, remains associated with such activities are likely to be ephemeral (such as post holes) and general discard items.³⁸ A 1928 subdivision plan shows Gowan Brae to the north of Pennant Hills Road, as well as the location of the Burnside Orphan Homes bequest (Figure 36).



Figure 35 – Image of the Burnside Orphan Homes to the east of Masons Drive from 1947, showing the agricultural usage of the land and the 3 structures erected on the subject site in the c.1920s.

Source: SLNSW, image no. FL1459962

³⁶ *Architecture: An Australian Review of Architecture and the Allied Arts and Sciences*, 20 January 1919, pp. 6-13.

<https://nla.gov.au/nla.obj-2996673548/view?sectionId=nla.obj-3000519182&searchTerm=%22Burnside%22+Homes&partId=nla.obj-2996675128#page/n11/mode/1up/search/%22Burnside%22+Homes>

³⁷ Hilliard, 1989. *Gowan Brae, the First 100 Years: 1889-1989*, p.38.

³⁸ Hilliard, 1989. *Gowan Brae, the First 100 Years: 1889-1989*, p.36.

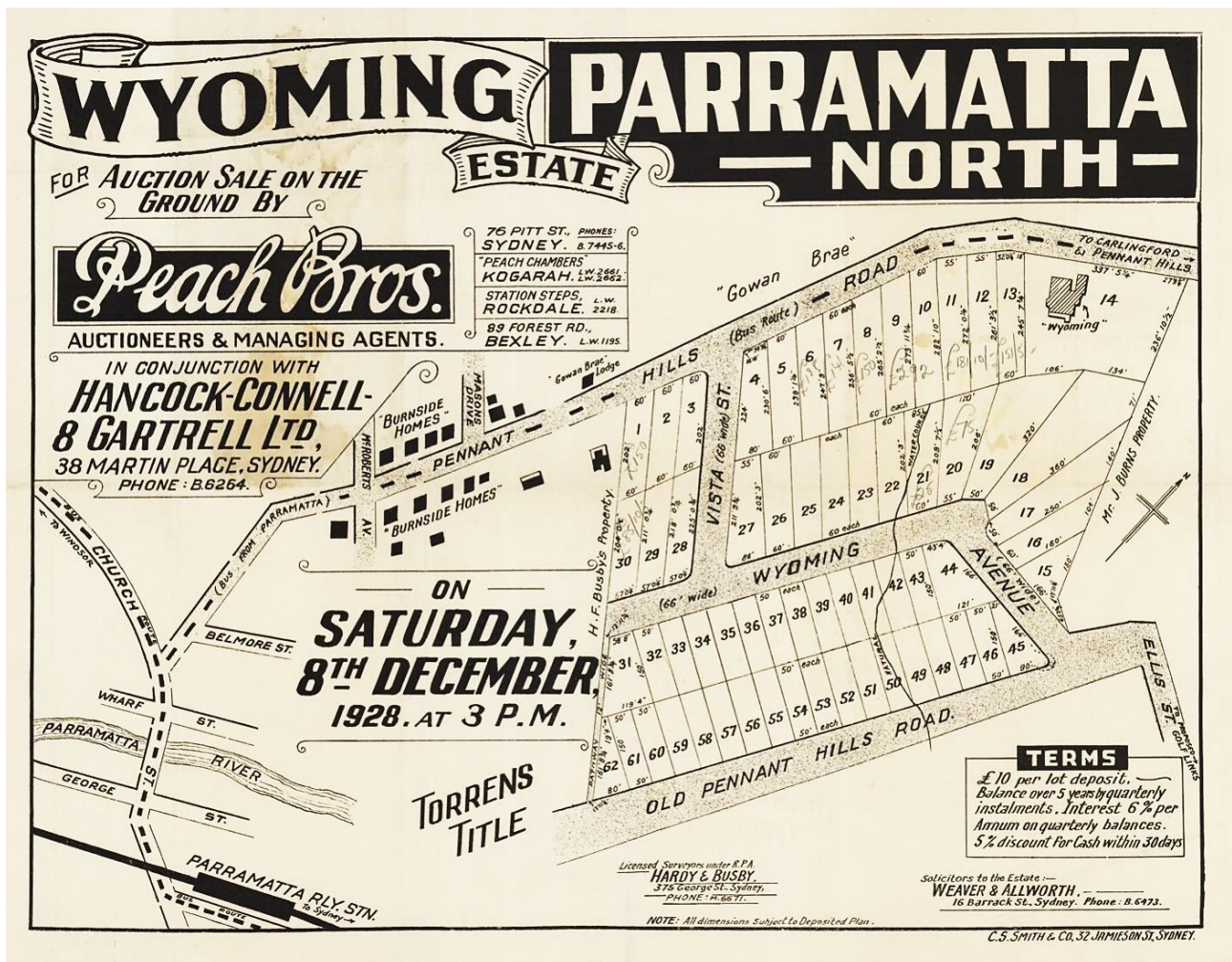


Figure 36 – Wyoming Estate subdivision plan showing location of the Burnside Homes, Gowan Brae and the Gatehouse in 1928. No outbuildings are featured on this plan, though it may be assumed that outbuildings existed in association with the structures.

Source: NLA, IE9139948

In 1940, the Australian Army assumed use of Gowan Brae House and the Burnside Orphan Homes for the Second Australian Division. The Army used it for its Schools and the Divisional Headquarters of Major General H. W. Lloyd and later Lieutenant-General Sir Iven G. Mackay.

During the army's period of occupation, substantial maintenance works were undertaken on Gowan Brae, including roads, services and building repairs. Potential flooring repairs, where undertaken, would likely have removed any archaeological resources associated with previous phases of Gowan Brae's construction and occupation. A false wall partition wall was constructed in the reception room and the museum was dismantled and stored. A timber structure was constructed between the main building and stables, which later became the classrooms of The King's Preparatory School. A further two timber structures were erected to the west of Gowan Brae House. Their form can be seen in the below 1942 (Figure 38, Figure 39 and Figure 40) and 1944 (Figure 37) detail sheets and 1943 aerial of the site (Figure 41). Although since demolished, the materiality of the structures is indicated to have been weatherboard in Figure 40.

In 1950, the decision was made by the Burnside Trust to sell Gowan Brae, due to the Homes' tenuous financial circumstances.

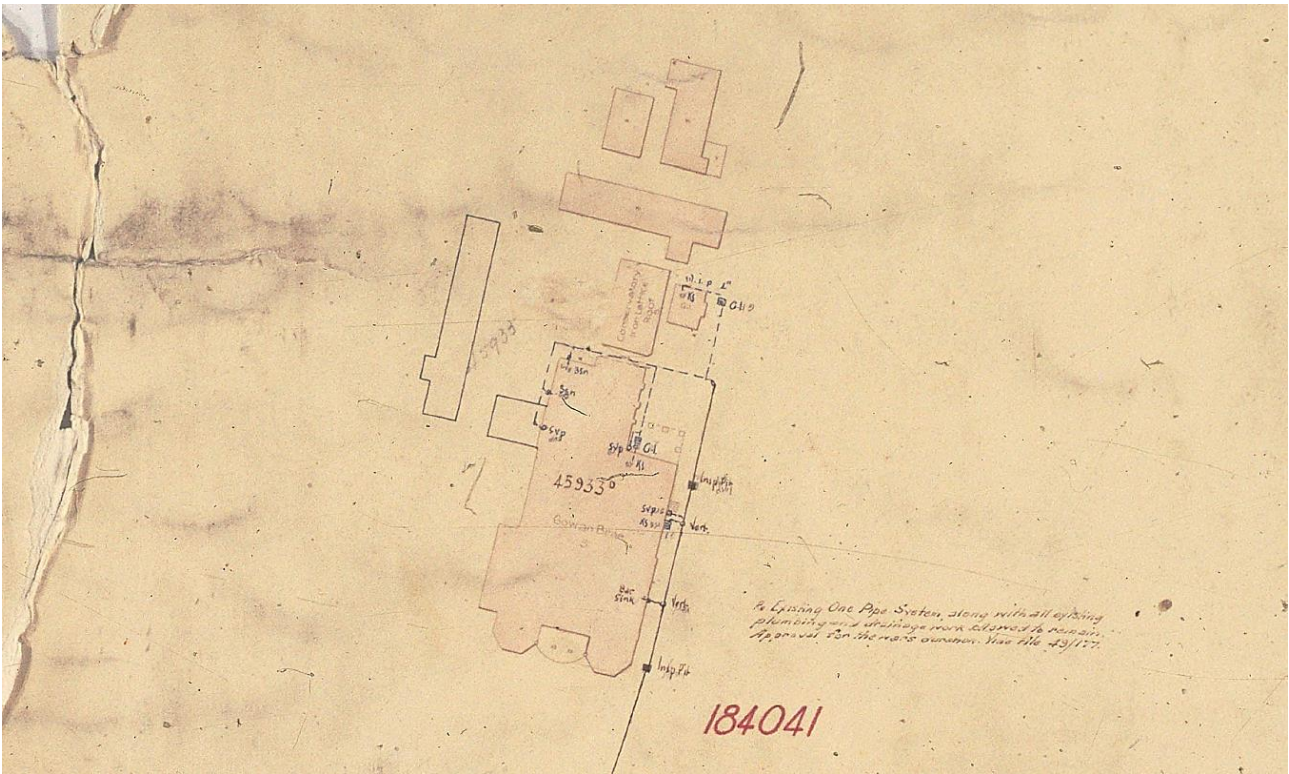


Figure 37 – 1944 detail sheet indicating form of the structures erected to north of Gowan Brae House.

Source: Sydney Water Archives

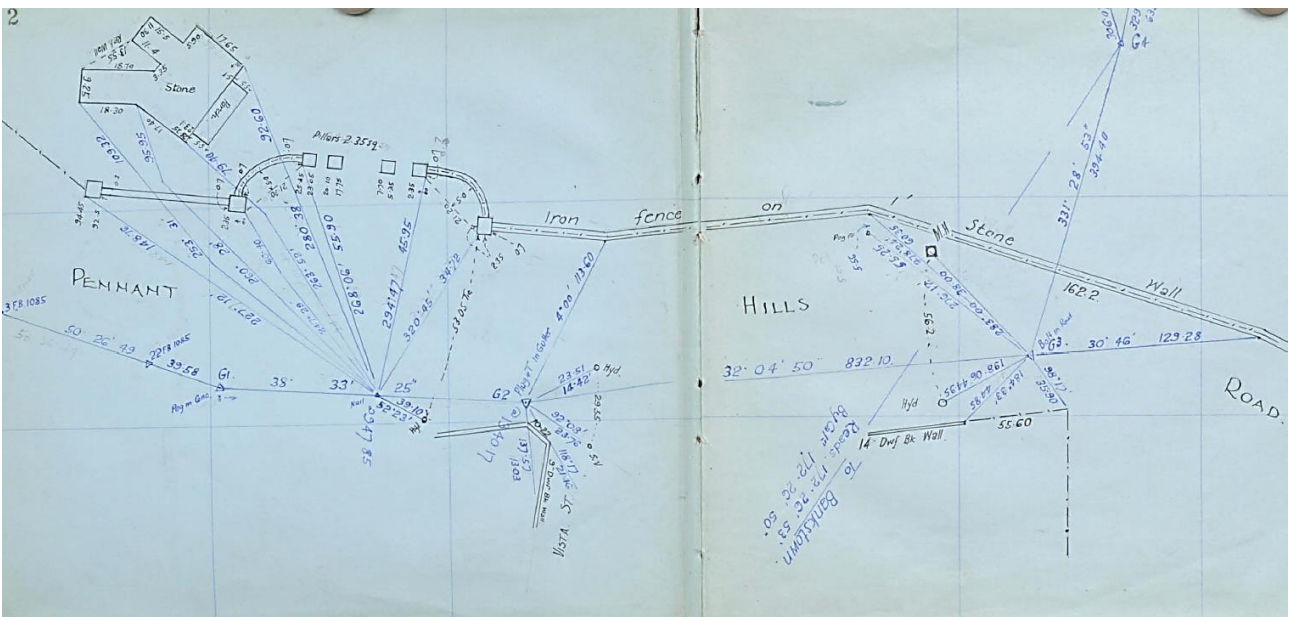


Figure 38 – 1942 detail sheeting indicating sandstone wall with iron fence along Pennant Hills Road and Gatehouse, which remains extant. Note presence of water connections evidence at this time.

Source: Sydney Water Archives

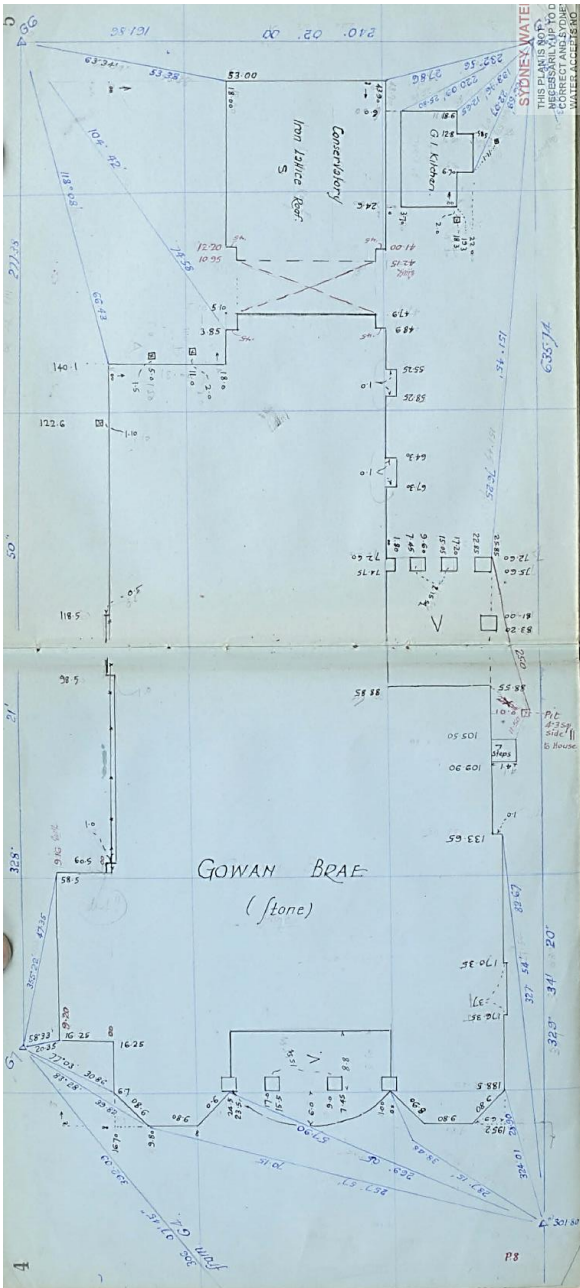


Figure 39 – 1942 detail sheet indicating footprint of Gowan Brae House

Source: Sydney Water Archives

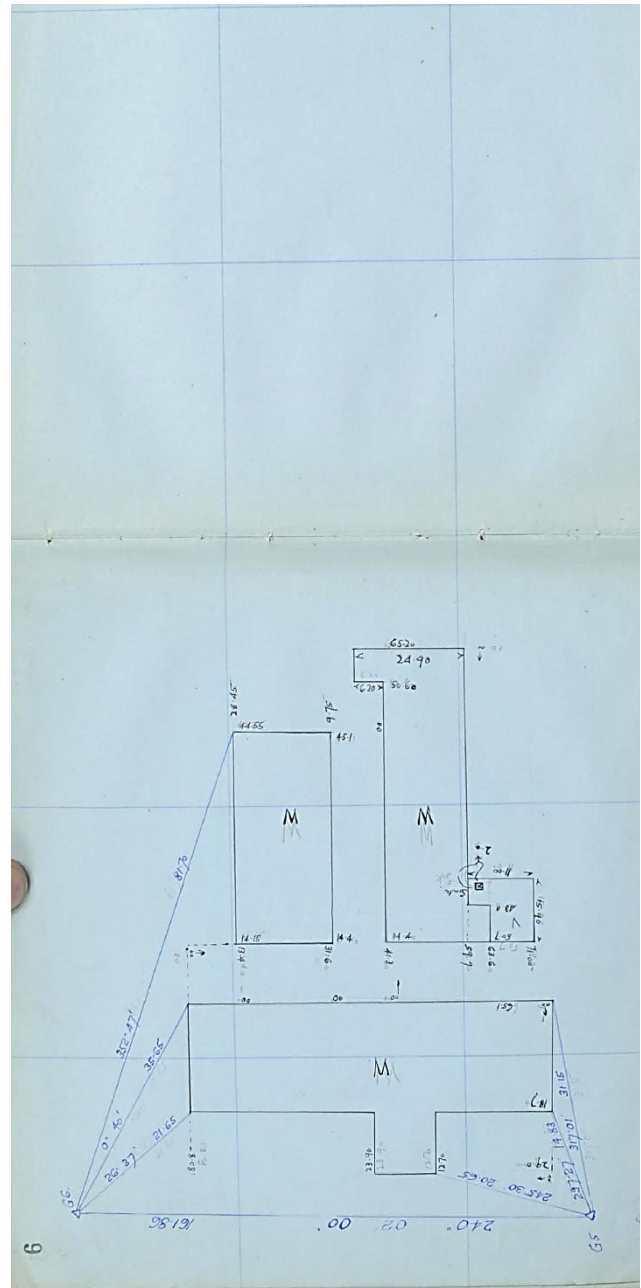


Figure 40 – 1942 detail sheet indicating form and materiality (namely weatherboard) of the structures which were erected to north of Gowan Brae House, connected to the water supply.

Source: Sydney Water Archives



Figure 41 – 1943 aerial of The King's School site with “The Cedars” and Gowan Brae. Note the timber structure constructed between the main building and stables during the Australian Army’s occupation of the site.

Source: SIX Maps

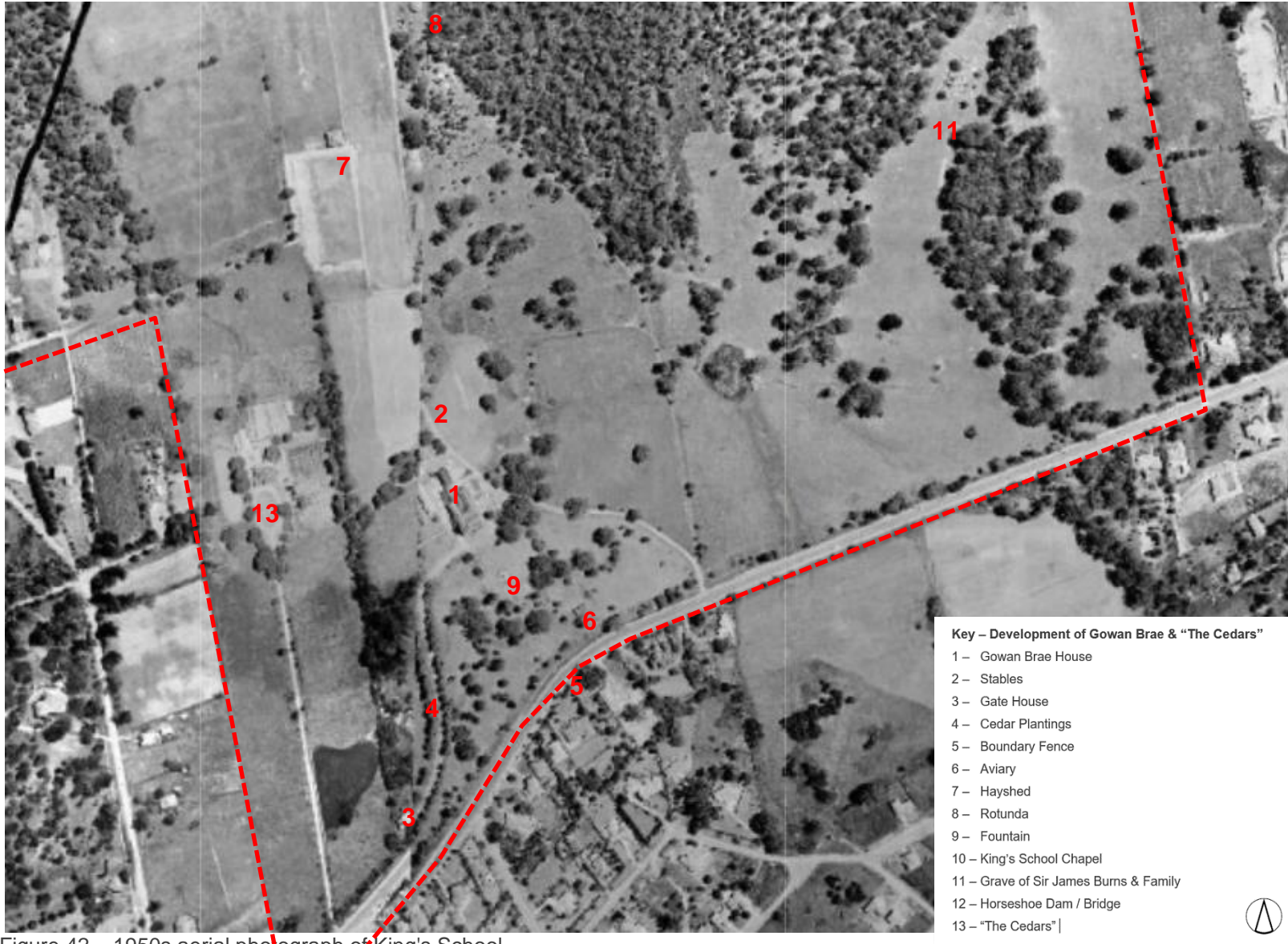


Figure 42 – 1950s aerial photograph of King’s School

3.1.4. Phase 4: Opening of the Kings Senior School, 1962-Present

A generous bequest by Mrs Violet Macansh, sister of the Futter brothers who attended the Kings School during the 1880s-90s, facilitated the school's purchase of Gowan Brae House.³⁹

Gowan Brae House was used from the outset as a Preparatory School, following some refurbishment (including redecoration) by old boy and school parent Mr Tom Wall. By 1955, the timber Army huts at the rear of the house were renovated and converted into classrooms. In both contexts, potential flooring repairs, where undertaken, would likely have removed any archaeological resources associated with previous phases of Gowan Brae's construction and occupation. Between 1955-1956, a dining room to the east of the kitchen and a new dormitory to the north-west of the main building were constructed.

In 1958 it was decided to construct a new Senior School at the eastern end of the property at the location of the Burns' family gravestones.⁴⁰ This development was approved in October 1960 and included the provision of site services, classrooms, dormitories, science laboratories, the administration centre, dining room and changing rooms. Further developments were undertaken by Stanley Wynton Kurrle in 1964, including the addition of new classrooms, as well as a gymnasium, swimming pool and three Houses. Comparison between the 1950s (Figure 42) and 1960s (Figure 45) aerial photographs indicates that the school underwent a significant transformation during this period.

In 1971, relocation of the Chapel from the original school site in Parramatta commenced (Figure 43). The original foundation stone for the chapel had been laid by Lady Carrington in 1887, after which time temporary wooden extensions to the building were constructed in 1908. At Gowan Brae, it would be erected without enlargement or significant alteration on a hill to the west of the White Oval. The interior of the Chapel was, however, modified, including the enlargement of the chancel and movement of the altar to a free-standing location within the sanctuary. Given the reconstruction of the chapel on the site, evidence of earlier configurations is unlikely to occur.



Figure 43 – Skilled craftsmen rebuild the Chapel

Source: *The King's Times*, May 1971, p.1

In 1984 a new classroom complex was constructed for the Preparatory School and, shortly thereafter, the three timber army structures located to the north-west of Gowan Brae House were removed (1988). It is

³⁹ A Brief History of the Kings School, *The King's School*, accessed 16 October 2020, available at <https://www.kings.edu.au/about/history-towards-gowan-brae.php>

⁴⁰ *Ibid*, p.54

unlikely that physical evidence of the army structures would survive at the site, due to the timber construction and the erection of a junior boarding house within the area in 1994. The construction of the junior boarding house phase also included refurbishment to Gowan Brae. In that context, potential flooring repairs, where undertaken, would likely have removed any archaeological resources associated with previous phases of Gowan Brae's construction and occupation.

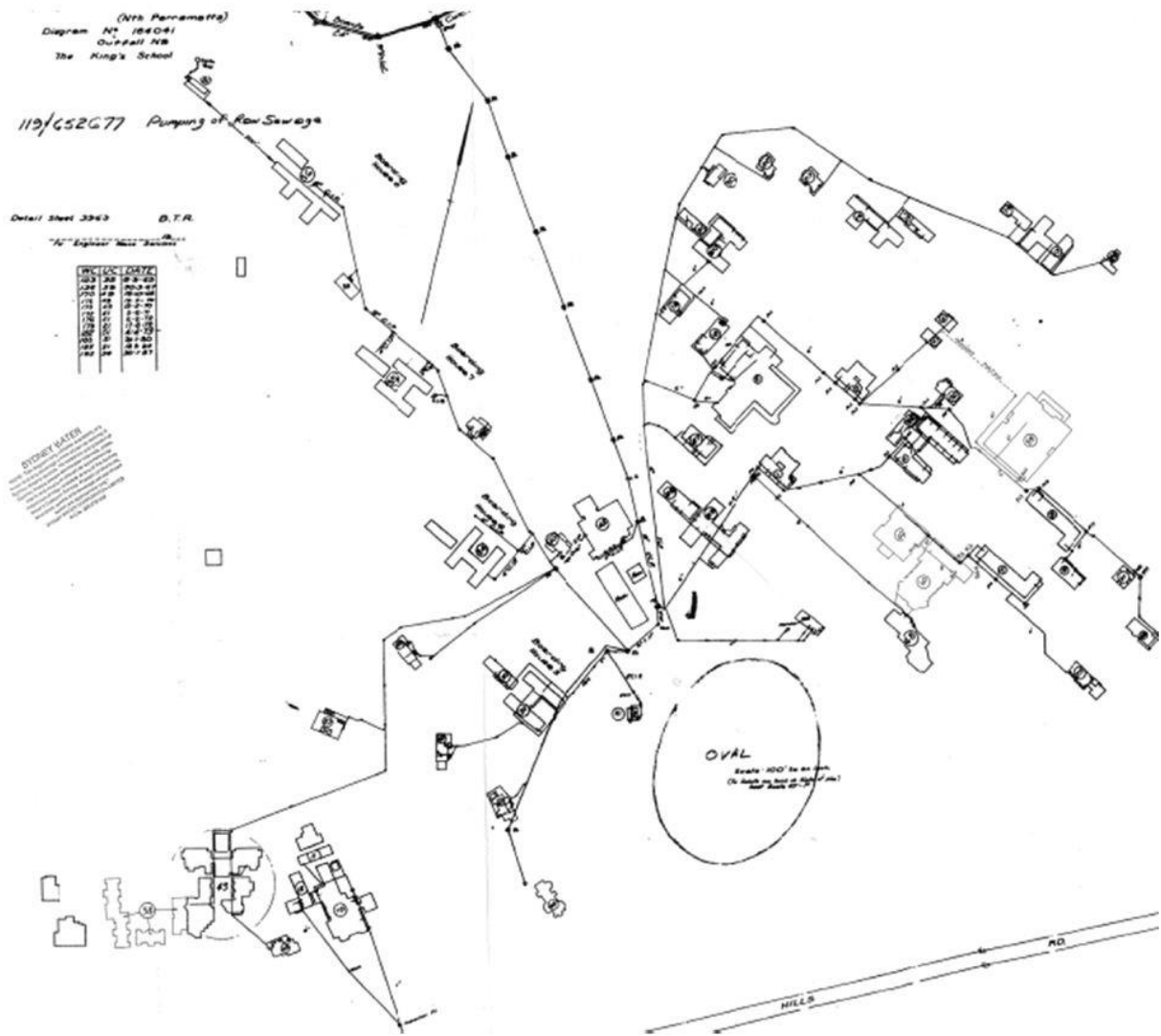


Figure 44 – Sketch of the existing hydraulic services across the Kings School campus.

Source: Sydney Water, detail sheet 3363.

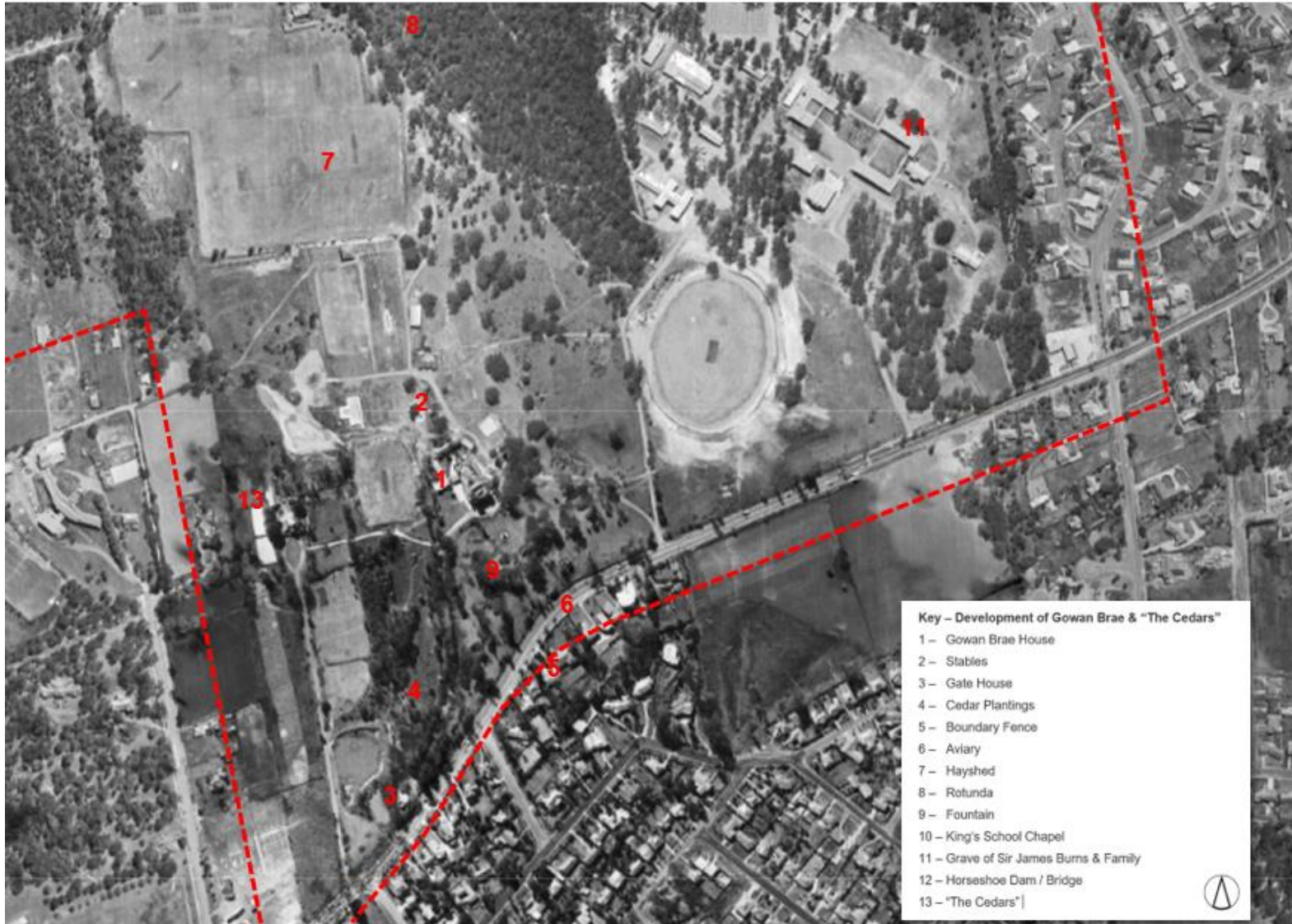


Figure 45 – 1960s aerial photograph of King’s School site

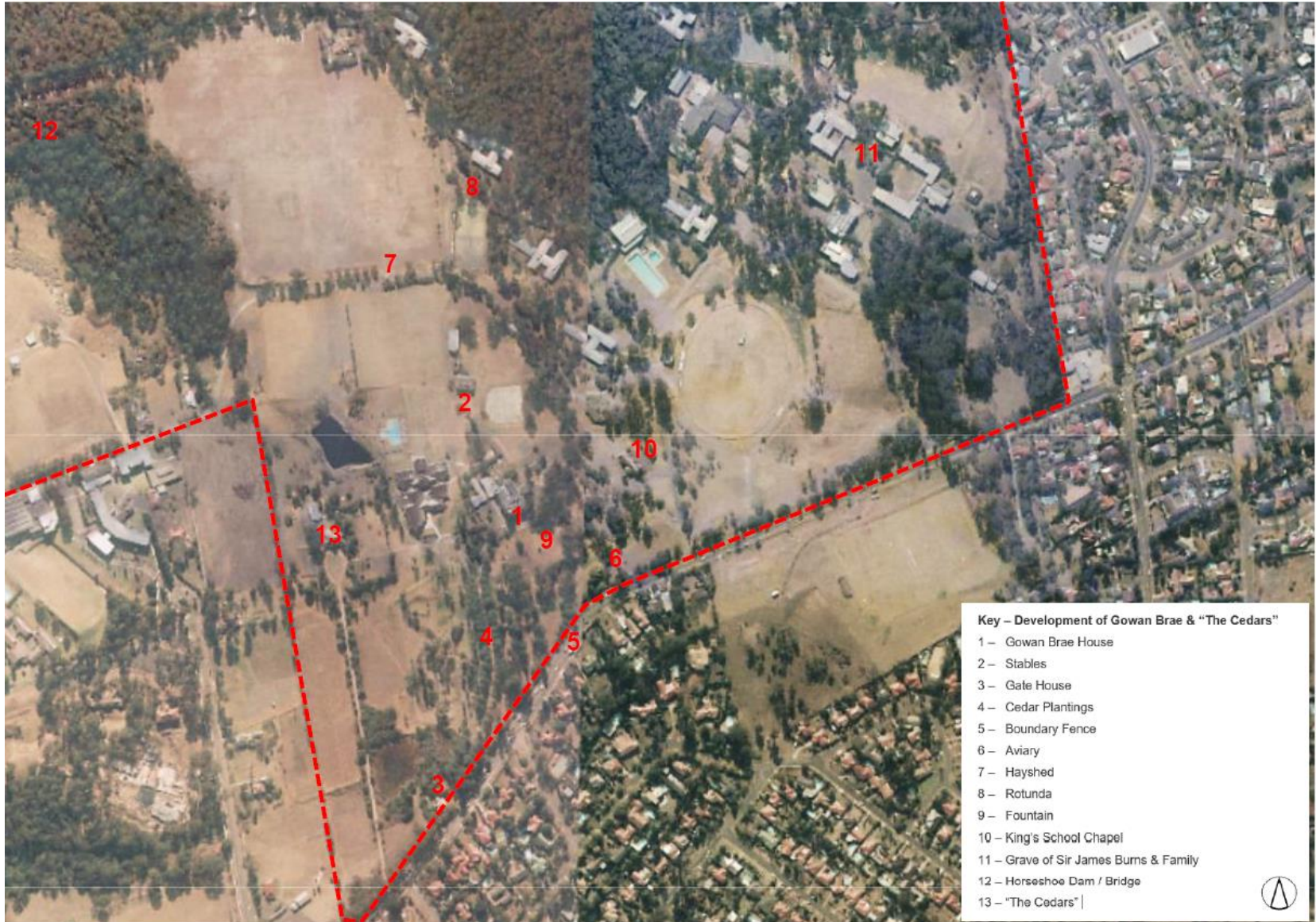


Figure 46 – 1980s aerial photograph of King’s School



Figure 47 – 1990s aerial photograph of King's School

4. ARCHAEOLOGICAL CONTEXT

4.1. PREVIOUS ARCHAEOLOGICAL INVESTIGATIONS

Previous archaeological investigations may provide information on the potential nature and distribution of archaeological resources in a given area. A summary of relevant assessments is provided below.

4.1.1. Comparative Archaeological Reports

Previous archaeological investigations of similar contexts to the subject site may provide information on the potential nature and distribution of archaeological resources. A summary of relevant assessments is provided below.

Archaeological & Heritage Management Solutions (AHMS), 2005, A Research Design & Excavation Methodology for Proposed Historical Archaeological Test Excavation at the Site

In May 2005, Archaeological & Heritage Management Solutions Pty. Ltd. (AHMS) was engaged by the Parramatta Linen Service to produce a Research Design & Excavation Methodology for a historical archaeological investigation of the proposed development site⁴¹. This site is at 73 O'Connell Street, approximately 1.8km from the subject site.

The site was constructed in 1972 for the purposes of building Parramatta Gaol's Linen Service. The purpose of the study was to assess the likely effects of proposed development which would involve the construction of a trolley storage area constructed on 22 pad footings.

The report demonstrated the site had a topsoil extending 200-400 mm which is likely to contain archaeological material from previous use including the mill races that cut through the site and the use of site as part of Parramatta Gaol farm. It was considered unlikely for archaeological evidence of Parramatta Gaol farm to be present within the extent of the subject area as buildings are not indicated in plans of the gaol.

The report also mentioned general land use at Parramatta including cultivation and farming. In early European occupation of the site (1792-1830s) 30 acres of land including the subject area was granted to Charles Smith for farming. This pertains to farming activity across Parramatta as an activity that was undertaken in the early phase of European occupation as well as later with the construction of Parramatta Gaol farm. Archaeological material relating to farming land use have the potential to be present in subsurface deposits.

The research design therefore recommended excavation of the site to identify and record any archaeological relics present. Excavation would continue until the Excavation Director gave archaeological site clearance.

Urbis, 2022, Historical Archaeological Impact Assessment, Meriden Senior School

In June 2022, Urbis was engaged by Meriden School to produce a Historical Archaeological Impact Assessment (HAIA) to investigate the potential impact to historical relics relating to proposed works⁴². This site is at 3 Margaret Street, Strathfield approximately 11 km from the subject area. This assessment is comparable due to the similarity of historic use, being large Estate allotments, as well as the ongoing current use as a educational facility.

The proposed construction location was determined to have low-high archaeological potential for relics of Local significance. Archaeological relics with potential to occur included relics associated with mid-19th to early 20th century residential development at the site.

Due to the potential for Local relics to be impacted from bulk excavation, the assessment recommended a research design be prepared to mitigate risk through invasive archaeological methodologies.

⁴¹ Archaeological & Management Solutions, 2005. *73 O'Connell Street. Parramatta. NSW: Historical Archaeological Research Design Methodology for Proposed Historical Archaeological Test Excavation At the Site.*

⁴² Urbis, 2022. *Heritage Impact Statement Assessment: Meriden Senior School, Strathfield Wangal Country SSD-39005127.*

Conybeare Morrison International Pty. Ltd., 2005, Heritage Impact Statement: Subdivision of the Foreshore Area, Marsden Rehabilitation Centre, Parramatta.

In August 2005, Conybeare Morrison International Pty. Ltd. was engaged by the NSW Department of Commerce to produce a Statement of Environmental Effects in support of a Subdivision Application for the foreshore area of the Marsden Rehabilitation Centre, which is located approximately 4.5km south-west of the subject site. The site was the former location of The Kings School between 1836-1964 and is identified as relevant on account of its relation to the history of the Kings School and for its contribution to the urban landscape. The purpose of the study was to assess the likely effects of subdividing the Marsden Rehabilitation Centre foreshore on the natural and built environment, as well as the social and economic impacts in the locality. Its assessment included a review of the aspects of the proposal that would affect the site's heritage significance.

This study identified numerous areas of historical archaeological potential across the site, which vary in their degrees of integrity, archaeological significance and research potential. Despite the determination of low potential for survival, archaeological resources associated with the site's pre-institutional occupation was regarded as state significant, due to the associated research potential and ability to inform historians' understanding of a largely undocumented stage in Parramatta's development. Conversely, remains associated with the development of the old Kings School were predicted to dominate the site's archaeological record, regarding these to be of State significance, due to their low-to-high research potential. The assessment Therefore recommended further investigation including monitoring in areas of high sensitivity and archaeological testing in areas of low-moderate sensitivity.

Edward Higginbotham & Associates Pty. Ltd., 2011, Report on the Archaeological Monitoring Programme during the Proposed Redevelopment, Our Lady of Mercy College, Victoria Road & O'Connell Street, North Parramatta, NSW.

In December 2009, Edward Higginbotham & Associates Pty. Ltd. were engaged by Our Lady of Mercy College to produce a report on the archaeological monitoring programme undertaken during works on the school's new Science Building, which is located approximately 3km south-west of the subject site. Potential archaeological resources associated with the site were graded as Locally significant, due to their potential to yield information about the development of North Parramatta in relation to the Parramatta CBD. Their report is considered relevant to the subject site, due to the study area's proximity to the Kings School and the site's comparable use over time, being a mid-19th Century residential property that was later converted into a parochial school.

Prior to any ground disturbance, Higginbotham & Associates assessed the site's topography, noting that the modern footing and service trenches were likely to cause minimal disturbance to sub-surface remains.⁴³ Geotechnical surveys of the site confirmed these suspicions, specifying that historical resources would be located at a depth of 200mm - 350mm.⁴⁴ That being the case, Higginbotham & Associates surmised that buildings dated before 1870 -1890 were likely to yield archaeological assemblages comprised of general discard items; whereas, this was unlikely for buildings dated after 1880, due to the commencement of off-site garbage disposal at that time.⁴⁵ For these reasons, an archaeological monitoring programme was recommended, the purpose of which was to minimise sub-surface disturbances and record archaeological remains uncovered during the proposed development.

Higginbotham & Associates' archaeological monitoring programme commenced in December 2009 and was completed in February 2011. In the course of their work, archaeological remains were recorded during excavations of the floor slab, piers and services for the new building. Their main findings comprised sandstone blocks and disturbed footings dating to the 1830s and 1880s respectively, and some intact sandstone footings and brickwork dating to the 1880s.

4.1.2. Conclusions from Previous Investigations

The following conclusions are drawn from previous archaeological investigations relevant to the subject site:

- Previous archaeological assessments carried out at similar sites confirm that archaeological resources have moderate-high potential to occur in areas of high disturbance, such as below extant school

⁴³ Edward Higginbotham & Associates Pty. Ltd. (2011: 24-25).

⁴⁴ Edward Higginbotham & Associates Pty. Ltd. (2011: 25).

⁴⁵ Edward Higginbotham & Associates Pty. Ltd. (2011: 28).

buildings. The subsequent disturbances have likely impacted the spatial and physical integrity of archaeological resources and, therefore, their significance. Areas that have minimal disturbance are likely to retain archaeological resources with higher spatial and physical integrity. Remains associated with the old Kings School were deemed to be of State significance, due to their low-to-high research potential.

- AHMS assessment of Parramatta Gaols Linen Service identified the potential for archaeological assemblage in the topsoil of the site between 200-400mm. If topsoil was similar to the subject area of Kings School, there is the potential for archaeological material within this layer. The area of Parramatta generally, has a history of cultivation and farming. Archaeological material relating to this land use may be present in subsurface deposits.
- The Urbis HAIA found low-high potential of locally significant archaeological relics to be present at Meriden Senior School. Their work identified that it was likely that archaeological assemblages comprised of general discard items, rubbish dumps and artefactual deposits from 1909 to the present day would meet the threshold for local significance.
- Higginbotham & Associates' assessment of Our Lady of Mercy College recognised a correlation between the commencement of off-site garbage disposal in the late-19th Century and the preservation of historical artefactual deposits. Their work identified a potential for archaeological assemblages comprised of general discard items at buildings dated before 1870 -1890 than those after 1880. Although, their work demonstrated no correlation between the preservation of wall footings and/or demolition rubble and the buildings' relative date. Rather, this was subject to the degree of sub-surface disturbance caused by modern redevelopment.
- Previous assessments of the former The Kings School sites have identified structural remains associated with school buildings and use.

4.2. GEOTECHNICAL INVESTIGATIONS

Geotechnical investigations were undertaken at the subject site by Crozier Geotechnical Consultants in July 2022.

The works comprised the drilling of four boreholes, the locations of which span the grassy area to the south-west of the Kings School Rec Field (Figure 48) After clearing the test locations, each borehole was drilled using a restricted access rubber tyred drill rig operating spiral flight augers in conjunction with a tungsten carbide bit. The results of the geotechnical investigations are discussed below.

Table 6 – Borehole Logs

BH #	Depth (m)	Description
BH01	0.0-0.5	Dark brown, gravelly clay; fine-to-medium subangular gravel.
	0.5-1.5	Hard, orange brown, mottled grey clay; traces of subangular gravel of shale. Anticipated to be natural B Horizon.
	1.5-1.9	Hard, orange brown, mottled pale grey clay; traces of subangular gravel of shale.
	1.9-2.7	Hard, orange brown, mottled pale grey clay; traces of subangular shale gravel tending to extremely weathered shale.
	2.7-4.0	Extremely low-to-very low strength grey shale (Wianamatta Group). Borehole terminated at 4.0m due to low strength shale.
BH02	0.0-0.3	Stiff, dark brown gravelly clay; fine-to-medium-grained gravel.

BH #	Depth (m)	Description
	0.3-0.7	Hard, red brown clay; fine-to-medium-grained, subangular gravel of shale. Anticipated to be natural B Horizon.
	0.7-0.75	Very low strength, grey shale (possible boulder in fill). Borehole terminated at 0.75m, due to auger refusal on possible boulder/low-to-medium strength bedrock.
BH03	0.0-0.9	Stiff, dark brown, gravelly clay; fine-to-medium-grained gravel of shale. Noticeably softer stratum of same constituents identified between 0.3-0.4m.
	0.9-1.9	Stiff, orange brown, gravelly clay; fine-to-medium-grained gravel of shale.
	1.9-2.8	Stiff, red brown clay; fine-to-medium gravel of shale. Anticipated to be natural B-Horizon.
	2.8-3.5	Stiff, grey mottled red clay; fine-to-medium gravel of shale.
	3.5-3.8	Extremely low-to-very low strength, grey shale (Wianamatta Group).
	3.8-3.9	Low-to-medium strength shale. Borehole terminated at 3.9m, due to refusal at 3.9 on account of the strength of shale.
BH04	0.0-0.9	Stiff, dark brown, gravelly clay; fine-to-medium gravel of shale.
	0.9-1.4	Stiff, brown and red clay, gravelly clay; fine-to-medium gravel of shale.
	1.4-2.0	Stiff, red brown clay; fine-to-medium gravel of shale. Anticipated to be natural B-Horizon.
	2.0-2.3	Very stiff, red brown clay; fine-to-medium gravel of shale.
	2.3-2.5	Hard, red brown clay; fine-to-medium gravel of shale.
	2.5-3.3	Hard, grey mottled red clay; fine-to-medium gravel of shale.
	3.3-3.5	Extremely low-to-very low strength, pale grey-brown shale (Wianamatta Group).
	3.5-3.9	Extremely low-to-very low strength, orange and yellow shale (Wianamatta Group). Borehole terminated at 3.9m, due to auger refusal in low-to-medium strength shale

The borehole results confirm the presence of clay fill layers across the subject site to depths of approximately 0.0-1.4m varying, with the potential for artefactual deposits to be identified within the fills. The geotechnical report notes that this fill varies in compaction and may include voids and/or potential soft zones, which could contain archaeological resources. The borehole results also demonstrate the occurrence of shallow, undulating shale across the site, occurring between the depths of 0.75-3.5m varying. Note

geotechnical analysis was only undertaken in the areas of the proposed STEAM building, with no geotechnical investigation available for the remainder of the site.

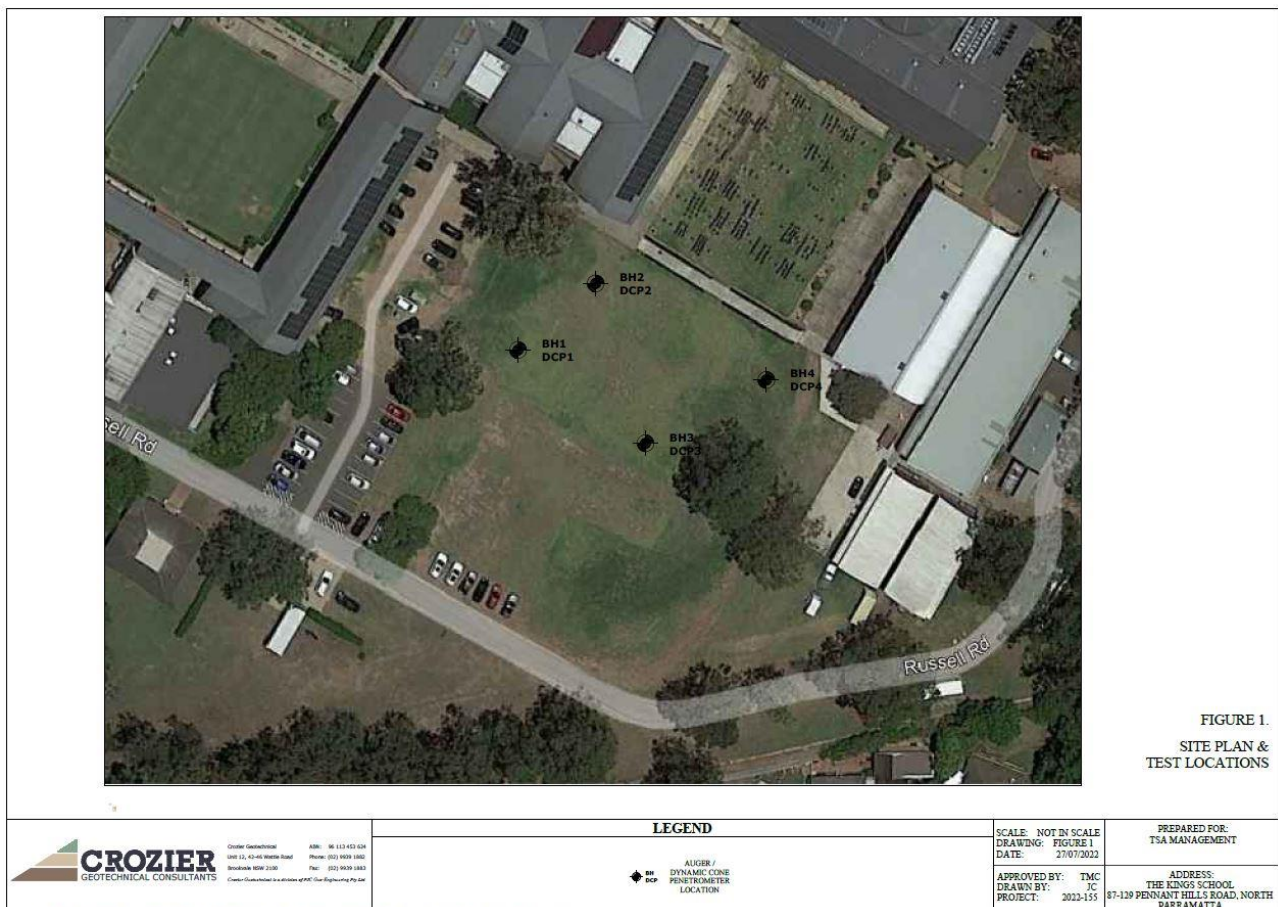


Figure 48 – Map of the Kings School’s proposed STEAM Building location showing borehole locations.

Source: Crozier Geotechnical Consultants (2022: fig.1).

4.3. VISUAL INSPECTION

Visual inspection of the subject site was undertaken by Urbis Senior Archaeologist Meggan Walker and Urbis Consultant Archaeologist Ginger-Rose Harrington on 28th September 2022. The site inspection focused on assessing the level of ground disturbance across the subject site. This was identified as being moderate-high, especially in the vicinity of the Kings School Quadrangle (except for the Burns family gravesite (Figure 59-Figure 60), where new developments were identified as having caused high ground disturbance likely to have resulted in the removal of previously accumulated archaeological deposits. Ground surface visibility across the whole of the site was generally low, due to paving and the presence of buildings or grass (for example, Figure 49). However, in the northern section of the subject site (proximate to the Prep School upgrade and new Tara entryway sites), areas of exposure were identified at:

- The Stables, where a potential road surface or flooring was visible (Figure 57).
- The Aviary, where potential flooring was identified (Figure 58).
- The Kings School Agricultural Centre, where sandstone footings and two outbuildings were visible (Figure 50, Figure 54-Figure 56).
- Gowan Brae Ave, where partially covered brick kerbing, sandstone paving and stairs were visible (Figure 51-Figure 53).
- The brush surrounding Hunts Creek, where potential modifications to the sandstone were visible at various points (Figure 61-Figure 62).

Unlike at Hunts Creek, where it likely reflects quarrying activity, these areas of exposure are likely related to the construction of Gowan Brae and, later, the Burnside Orphan Homes, both of which were co-opted and modified by numerous occupants over time. In general, a direct correlation exists between the identified areas of exposure and their degree of contemporary development. To demonstrate, to the west of the Stables, site disturbance is generally low and related the levelling and turfing of Price Fields (Figure 49). Whereas, the process of renovating the built heritage associated with the Burnside Homes likely removed the above-ground structural features, whilst preserving deep and structural features (Figure 50). By this same token, maintaining the road surfaces around Gowan Brae and, eventually, the process of laying asphalt over Gowan Brae Ave may have capped previously accumulated deposits in this area (Figure 52).

Photos from the site inspection are shown in Figure 49 to Figure 62 below.



Figure 49 – General view of the Price Fields, west of the Stables.



Figure 50 – Barn associated with the Agricultural Centre that has co-opted historic sandstone footings.



Figure 51 – General view of Gowan Brae, showing the extent of ground disturbance to the area (including buildings, turfing and asphalt).



Figure 52 – General view of Gowan Brae, showing the abrupt intrusion of the asphalt onto the sandstone paving at the entryway.



Figure 53 – Sandstone steps to the south-east of Gowan Brae, which are partially covered by the turfing of the area.



Figure 54 – Timber outbuilding with paving identified in association with the Agricultural Centre.



Figure 55 – Brick outbuilding identified in association with the Agricultural Centre.



Figure 56 – Sandstone footings identified as having been integrated into a barn associated with the Agricultural Centre.



Figure 57 – Potential road surface or flooring identified as exposed to the west of the Stables.



Figure 58 – Potential flooring identified as exposed to the south of the Aviary.



Figure 59 – Burn's Family gravesite area.



Figure 60 – Burns family gravesite area.



Figure 61 – Potential sandstone modifications visible proximate to Hunts Creek.



Figure 62 – Sandstone modifications visible proximate to Hunts Creek.

The site inspection identified the following:

- Although some partially sunken facilities were observed on the school grounds, such as the Sports Centre building (Figure 63), the proposed areas for development do not contain basement levels. The lack of basement levels within the proposed development areas suggests that there is a higher potential for subsurface archaeological resources, especially deep features, to be retained at those localities.
- Despite likely causing moderate ground disturbances, some areas of exposure were identified in turfed portions of the site, such as at the Price Fields, Aviary and at the Gowan Brae gardens. Exposed elements included possible flooring and/or road surfaces, as well as sandstone stairs. Although several of these locations have documented disturbance works, including the installation of subsurface utilities, these have overall undergone minimal disturbance and are, therefore, more likely to retain archaeological resources.
- Despite likely causing moderate ground disturbances, some areas of exposure were identified in asphalted portions of the site, such as around the periphery of Gowan Brae Ave. Exposed elements included Brick curbing and sandstone paving. There were also numerous unexposed, asphalted areas with no documented disturbance works, such as along Masie Rd and at the staff carpark, which are, therefore, more likely to retain archaeological resources.
- Despite visibly compromising the built heritage, some exposed areas were identified in portions of the site where historic buildings had been modified to facilitate ongoing contemporary use. The Agricultural Centre was most densely populated with such cases of reuse. In one instance, sandstone footings were identified as having been integrated into a barn and, in another, a historic outbuilding was identified as having been modified to integrate a toilet. In these areas, the lack of basement level redevelopment,

coupled with the facilities' ongoing agricultural use, there is a higher likelihood for archaeological resources to be preserved.

- Numerous gravesites are known to be located at the Burns family cemetery. Despite the turfing likely causing moderate ground disturbance to the area, there is no documentary evidence of disturbance works that may have compromised subsurface archaeological remains within the bounds of the cemetery. Therefore, there is a known potential for human remain to occur within the cemetery, with grave markers indicating the grave locations of the Burns family.



Figure 63 – Interior of the Senior School Sports Centre, showing the sub-surface level of basketball courts, relative to the ground level.

Source: *The Kings School, 2022.*

5. ARCHAEOLOGICAL POTENTIAL

5.1. FRAMEWORK FOR ASSESSMENT

The *NSW Heritage Manual* (Heritage Office and Department of Urban Affairs and Planning, 1996) defines historical archaeological potential as:

The degree of physical evidence present on an archaeological site, usually assessed on the basis of physical evaluation and historical research.

Archaeological research potential of a site is the extent to which further study of relics likely to be found is expected to contribute to improved knowledge about NSW history which is not demonstrated by other sites, archaeological resources or available historical evidence. The potential for archaeological relics to survive in a particular place is significantly affected by later activities that may have caused ground disturbance. These processes include the physical development of the site (for example, phases of building construction) and the activities that occurred there.

The archaeological potential of the subject site is assessed based on the background information presented in Section 3 and graded according to the following scheme:

- **Nil Potential:** the land use history demonstrates that high levels of ground disturbance have occurred that would have destroyed any archaeological remains; or archaeological excavation has already occurred and removed any potential resource.
- **Low Potential:** the land use history suggests limited development or use, or there is likely to be quite high impacts in these areas; however, deeper sub-surface features such as wells, cesspits and their artefact bearing deposits may survive.
- **Moderate Potential:** the land use history suggests limited phases of low to moderate development intensity, or there have been some impacts in the area. Some archaeological remains are likely to survive, including building footings and shallower remains, in addition to deeper sub-surface features.
- **High Potential:** substantially intact archaeological deposits could survive in these areas.

The potential for archaeological remains or 'relics' to survive in a particular place is significantly affected by land use activities that may have caused ground disturbance. These processes include the physical development of the site (e.g. phases of building construction) and the activities that occurred there. The following definitions are used to consider the levels of disturbance:

- **Low Disturbance:** the area or feature has been subject to activities that are likely to have had a minor effect on the integrity and survival of archaeological remains.
- **Moderate Disturbance:** the area or feature has been subject to activities that may have affected the integrity and survival of archaeological remains. While archaeological evidence may be present, they are likely to have been disturbed.
- **High Disturbance:** the area or feature has been subject to activities that would have had a major effect on the integrity and survival of archaeological remains. Archaeological evidence are likely to be significantly disturbed or destroyed.

The following assessment of archaeological potential of the present subject site has been undertaken based on the above framework.

5.2. ASSESSMENT OF ARCHAEOLOGICAL POTENTIAL

An assessment of archaeological potential associated with each phase of development of the subject site is provide in Table 7 below. The assessment of archaeological potential within the subject site is mapped in Figure 64 below.

Table 7 – Assessment of Archaeological Potential

Phase	Potential Archaeological Resource	Integrity	Archaeological Potential
<p>1. Early Land Grants (1792-1839)</p>	<p>Structural remains, deep features, ephemeral evidence, general discard items.</p>	<p>During this phase, the subject site was divided into lots, distributed between discharged soldiers of the Corps (1790-1830s). Evidence of the division of land in the form of post holes associated with fencing or survey lines is unlikely to survive at the site due to subsequent disturbance and the ephemeral nature of such evidence.</p> <p>In the early-19th Century, the subject site was variously developed into farmstead style properties, functioning for both residential and agricultural purposes and allowing soldiers to both work and live on the land. Lots 4, 115, 116 and 154 were occupied as farmland from at least the 1840s. Archaeological remains associated with this use would likely be ephemeral features such as post holes and cropmarks, or else artefacts deposited from intentional or incidental discard. However, the pattern and clarity of postholes or other such ephemeral evidence of agricultural works are likely to have been disturbed or entirely removed by subsequent development. With regard to discard items, these deposits are likely to be preserved with little spatial and physical integrity, due to their cursory nature and the extent of subsequent development.</p> <p>Portion 4 (Josiah James' allotment) is understood to have contained a cottage, which may have been of timber construction although this is not documented in the historic record. No maps are available which demonstrate where James' cottage was located, however it is likely that this fronted the street to the north, which would place this outside of the subject site. As such, it is not likely that associated structural remains or deep features would be located within the subject site.</p>	<p>Low</p>

Phase	Potential Archaeological Resource	Integrity	Archaeological Potential
<p>2. Sir James Burns and Gowan Brae (1886-1925)</p>	<p>Structural remains, demolition material, early paths and roads, evidence of landscaping, human remains.</p>	<p>During this phase, the subject site was acquired by Sir James Burns, who began works on Gowan Braw House in 1886. At this stage, Gowan Brae consisted of a U-shaped sandstone structure with an asymmetrically positioned square tower. One outbuilding is retained to the north of Gowan Brae. At this time, Burns also began work on Gowan Brae Drive and, as such, there is some potential for early road surfaces (probably comprised of crushed sandstone surfacing rather than formalised paving) to occur alongside associated landscaping. Other archaeological evidence associated with Gowan Brae is unlikely to occur, as the property remains at the site and previous works associated with development on the site resulting in the removal of underfloor deposits (currently on display in the Gowan Brae foyer). Due to the date of construction, it is unlikely that deep features associated with Gowan Brae (such as wells or cesspits) would occur, with water connection established by this time and no indication of these features in the historic record.</p> <p>A fernery was constructed to the north-west of Gowan Brae by, at least, 1895. The fernery has since been dismantled and repurposed into an enclosed outdoor courtyard. As such, there is some potential that demolition fill associated with this phase could occur, however given the nature of fill, such deposits would likely hold low spatial and physical integrity.</p> <p>Shortly after the completion of Gowan Brae House, the Stables and Gatehouse were constructed (1889). Like with Gowan Brae, these structures are likely to have adjacent pathways with associated landscaping.</p>	<p>Moderate-High</p>

Phase	Potential Archaeological Resource	Integrity	Archaeological Potential
		<p>One cemetery dedicated to the Burns Family remains extant to the east of Gowan Brae. As such, there is a high potential for human remains to occur in this area.</p> <p>General discard items of a domestic nature are likely to be dispersed throughout the subject site – particularly around Burns’ developments. However, these deposits are likely to be preserved with little spatial and physical integrity, due to their cursory nature and the extent of subsequent development.</p>	
<p>3. Changing uses of Gowan Brae (1925-1955)</p>	<p>Structural remains, demolition material, early road surfaces, ephemeral evidence.</p>	<p>Between 1910-1928, the subject site was acquired by the Burnside Orphan Homes. In this time, 3 dormitories were constructed within a south-western portion of Hacketts’ former Orange Grove allotment. Historical evidence provides no evidence that the dormitories which are part of Burnside Orphan Homes have been demolished. Further to this, the Burnside Orphan Homes included expansive recreational and agricultural grounds with vehicular road access to the south. In this time, most agricultural works and animal husbandry were undertaken to the east of Masons Drive and north of Gowan Brae, which was occupied by the Homes from 1932. As such, there is potential for ephemeral remains including post holes and evidence of landscaping to occur. Due to their ephemeral nature and subsequent land use, these resources are not likely to be preserved.</p> <p>From 1940, during Phase 3, Gowan Brae and the Burnside Orphan Homes were occupied by the Australian Army’s Second Australian Division. The site was adapted to accommodate its Schools and Divisional Headquarters. As such, three timber structures were constructed between the main building and stables (1942-44). These structures were renovated into classrooms in 1955 and remained extant until 1988. Two timber army structures located west of Gowan</p>	<p>Low-moderate</p>

Phase	Potential Archaeological Resource	Integrity	Archaeological Potential
		<p>Brae House between the primary building and the stables were also constructed in Phase 3 and subsequently demolished. It is unlikely that physical evidence of the army structures would survive at the site, due to the timber materiality of the structures reducing the potential for their survivability. A new junior boarding house was constructed in 1994 where the army structures had previously been located which could also reduce the survivability of any physical evidence from these structures.</p> <p>More robust evidence including structural remains are likely to be retained in a better state of preservation, albeit truncated and/or disturbed by subsequent development.</p> <p>Due to the onset of regular rubbish disposal during this time, it is unlikely for there to be deposits of general discard items throughout the site dating to this period.</p>	
<p>4. Opening of the Kings Senior School (1962-Present)</p>	<p>Demolition material and discard items</p>	<p>During this phase, the subject site was acquired by the Kings School. This change in ownership was accompanied by numerous developments which facilitated the site's reuse as a school. These developments included a new dormitory to the north-west of Gowan Brae (1955-56); facilities for a new Senior School at the Burns' family grave site (1958); new sports facilities, classrooms and three houses proximate to the Senior School (1964); and a Chapel (1971). Finally, in 1994, a new boarding house was constructed to the north of Gowan Brae.</p> <p>Due to their date of construction, it is unlikely for underfloor deposits to occur in association with these buildings. There is some potential that demolition fill associated with this phase could occur – particularly, to the north-west of the stables and in the vicinity of the sports centre. However, given the nature of fill, this would likely hold</p>	<p>Moderate</p>

Phase	Potential Archaeological Resource	Integrity	Archaeological Potential
		<p>low spatial and physical integrity. It is also unlikely for general discard items to be retained from this phase, due to regular rubbish disposal in the area at this time.</p>	

5.3. STATEMENT OF ARCHAEOLOGICAL POTENTIAL

The archaeological potential is varied in association with each phase of occupation at the subject site.

This assessment has identified that Phase 1 (Early Land Grants, 1792-1839) has **low potential** for archaeological resources to occur due to subsequent disturbance and ongoing use of the site and the ephemeral nature of remains associated with this phase, including post holes and crop/plough marks.

In Phase 2 of occupation at the site (James Burns' ownership, 1886-1925), the subject site underwent substantial development including the construction of the extant Gowan Brae. Archaeological evidence associated with this phase is anticipated to include demolition material, ephemeral evidence and human remains. There is **low potential** for demolition material to occur associated with the Fernery, since partially demolished, which was located to the west of Gowan Brae. Ephemeral remains and evidence of landscaping associated with this phase are also considered to have **low potential** to occur. Such resources are expected to include early road surfaces and evidence of landscaping, which may occur along Gowan Brae Drive or in the vicinity of the Stables and Gatehouse. Although, due to their nature and the extent of subsequent development. Finally, the subject site contains the Burns family gravesite, and thus has **high potential** for human remains to occur in this area.

There is **low-moderate potential** for archaeological resources to occur associated with Phase 3. Archaeological evidence associated with this phase is anticipated to include structural remains, demolition material and ephemeral evidence. Structural remains of the Burnside Orphan Homes may occur in the south-west of the site. Given the extent of subsequent development, these remains are likely to be truncated or, at least, significantly disturbed. Also, within this area, ephemeral remains of agriculture may be retained, along with evidence of landscaping. However, due to the nature of such deposits and subsequent developments, these remains may hold little spatial and/or physical integrity. They are also unlikely to be definitively attributable to a particular phase due to the ongoing use of the site for agricultural purposes. Demolition material associated with the school facilities constructed by the Australian Army may occur to the north and west of Gowan Brae House. However, the spatial and physical intactness of these deposits are likely compromised by the extent of subsequent development in these areas as well as the timber materiality of the structures which has a low potential of survivability.

There is **moderate potential** for archaeological resources to occur associated with Phase 4. Archaeological evidence associated with this phase is anticipated to include demolition material. This fill is most likely to occur north-west of the stables and in the vicinity of the sports centre. However, given the nature of fill, this would likely hold low spatial and physical integrity.



LOW POTENTIAL
 MODERATE POTENTIAL
 HIGH POTENTIAL

Figure 64 – Map of historical archaeological potential within the subject site. Note that across the remainder of the subject site, there remains low potential for evidence of agriculture including cursory structural remains, ephemeral evidence, deep features and general discard items. However, due to an absence of reliable mapping, their locations may not be accurately predicted. Evidence suggests it is unlikely that deep features would occur within the subject site, with no historical documentation demonstrating the presence of houses within the subject site during the early phases of development.

6. SIGNIFICANCE ASSESSMENT

6.1. FRAMEWORK FOR ASSESSMENT

The concept of archaeological significance is independent of archaeological potential. For example, there may be ‘low potential’ for certain relics to survive, but if they do, they may be assessed as being of (State) significance.

Archaeological significance has long been accepted as linked directly to archaeological (or scientific) research potential: a site or resource is said to be scientifically significant when its further study may be expected to help answer questions. Whilst the research potential of an archaeological site is an essential consideration, it is one of a number of potential heritage values which a site or ‘relic’ may possess. Recent changes to the *Heritage Act 1977* (Section 33(3) (a)) reflect this broader understanding of what constitutes archaeological significance by making it imperative that more than one criterion be considered.

The below assessment of archaeological significance considers the criteria, as outlined in the NSW Heritage Branch publication *Assessing Significance for Historical Archaeological Sites and ‘Relics’*. Sections which are extracted verbatim from this document are italicized.

For the purposes of this assessment, significance is ranked as follows:

- **No Significance** – it is unlikely that any archaeological resources recovered will be attributed significance in accordance with the assessment criteria on a state or local level.
- **Local Significance** – it is likely that archaeological resources recovered will be significant on a local level in accordance with one or more of the assessment criteria.
- **State Significance** – it is likely that archaeological resources recovered will be significant on a state level in accordance with one or more of the assessment criteria.

The following Criteria are used to assess archaeological significance (from *Assessing Significance for Historical Archaeological Sites and Relics*, Heritage Branch NSW).

Table 8 Significance Criteria

Criterion Letter	Criterion	Definition
A	Historical Significance	An item is important in the course or pattern of the local area’s cultural or natural history.
B	Associative Significance	An item has strong or special associations with the life or works of a person, or group of persons, of importance in the local area’s cultural or natural history.
C	Aesthetic or technical significance	An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the local area.
D	Social Significance	An item has strong or special association with a particular community or cultural group in the local area for social, cultural or spiritual reasons.
E	Research Potential	An item has potential to yield information that will contribute to an understanding of the local area’s cultural or natural history.
F	Rarity	An item possesses uncommon, rare or endangered aspects of the local area’s cultural or natural history.

Criterion Letter	Criterion	Definition
G	Representativeness	An item is important in demonstrating the principal characteristics of a class of NSWs (or the local area's) <ul style="list-style-type: none"> ▪ cultural or natural places; or ▪ cultural or natural environments

1.1. ASSESSMENT OF SIGNIFICANCE

An assessment of archaeological significance associated with each phase of development of the subject site is provided in Table 9 below.

Table 9 Assessment of Significance

Criterion	Discussion
A - Historical Significance	<p>For the majority of the site's earliest phase of European occupation, the subject site formed agricultural land (1792-1839). Archaeological resources anticipated to occur from this period include cursory structural remains, deep features, ephemeral remains and general discard items. These remains may hold historical significance, due to their potential to yield information on the importance of agriculture and pastoralism in the early economic development of Parramatta. As such, archaeological evidence of Phase 1 including ephemeral remains, deep features and general discard items would satisfy this criterion on a Local level, despite having a low potential to occur.</p> <p>During Phase 2, the subject site underwent considerable development, chiefly due to James Burns' amalgamation of several, formerly independent landholdings for the construction of Gowan Brae House, the Stables and Gatehouse. Archaeological resources anticipated to occur include structural remains, deep features, evidence of landscaping and early roads, and human remains. These remains may generally hold historical significance, due to their potential to yield information on site's transition from an agricultural to residential property during the 19th Century. Physical remains of the Burns family grave site are also historically significant as a marker for the phases of life, demonstrating the final stages of human life and disposal of the dead during the early-20th Century. As such, archaeological evidence of Phase 2 including structural remains of the Burns family residence (with associated landscaping and outbuildings) and grave site would satisfy this criterion on a Local level.</p> <p>The subject site underwent considerable change throughout the 20th Century, culminating with the construction of several school buildings throughout the subject site by 1962 (Phases 3-4). Anticipated archaeological remains from this period include structural remains, demolition material, early road surfaces and ephemeral evidence. Such resources are not considered historically significant beyond their ability to demonstrate the development of the subject site from a mixed use residential/commercial property to an educational establishment in the Parramatta area during the 20th Century.</p> <p>Generally, archaeological resources associated with Phase 1 and Phase 2 would satisfy this criterion for significance on a Local level, should they survive with high integrity.</p>

Criterion	Discussion
B – Associative Significance	<p>From Phase 2, structural remains of Burns' former Fernery have moderate potential to occur to the west of Gowan Brae House. These are unlikely to physically express their connection to James Burns, who funded the home's construction and occupied the site at the time. Such resources do, however, provide a tangible connection with Cooper Day – the renowned 19th Century architect who designed Gowan Brae House (including the original fernery). There is also a high potential for human remains to occur from this phase at the Burns family's gravesite. These remains are clearly associated with Sir James Burns and his immediate family.</p> <p>There is low-moderate potential for structural remains and demolition material to occur associated with Phase 3. Structural remains and demolition material relating to the school facilities constructed by the Australian Army may occur to the north and west of Gowan Brae House. Although these remains may be broadly associated with the Australian Army, they are unlikely to provide a tangible connection with Major General H. W. Lloyd or Lieutenant-General Sir Iven G. Mackay, whose Divisional Headquarters were stationed here.</p> <p>On the basis of the above assessment, anticipated archaeological resources which occur with high integrity, which could include structural remains of Burns' former Fernery and Australian Army Divisional Headquarters would satisfy this criterion on a Local level.</p>
C – Aesthetic Significance	<p>The archaeological evidence of the subject site's early land use phases are anticipated to include postholes relating to former sheds/outbuildings and some structural remains, deep features and general discard items. Such resources are not considered to be an exceptional example of technical achievement, but instead represent typical structural remains and discard items from a mid-18th to early-19th Century agricultural property.</p> <p>Archaeological evidence of the subject site's later commercial and educational land use phases is anticipated to include general discard items, deep features, and structural remains. Although structural remains of Burns' former Fernery may be considered to have aesthetic significance, due to their association with Cooper Day, these are unlikely to occur in substantial enough condition to satisfy this criterion. Additionally, remains of the Burnside Orphan Homes or Australian Army Divisional Headquarters are generally not considered to be exceptional examples of technical achievement, but instead represent typical structural remains and discard items from early-mid-20th Century educational and commercial facilities.</p> <p>On the basis of the above assessment, it is unlikely that archaeological resources would occur which satisfy this criterion on a Local or State level.</p>
D – Social Significance	<p>There is no evidence that the anticipated archaeological resources would hold a special association with a particular community or cultural group. Although structural remains of the Burnside Orphan Homes may be considered to hold social significance for its historic community uses, the anticipated archaeological resources demonstrating this use are ephemeral in nature and, therefore, not considered likely to occur.</p> <p>Therefore, it is unlikely that archaeological resources would occur which satisfy this criterion on a Local or State level.</p>

Criterion	Discussion
E – Research potential	<p>The archaeological resources anticipated to occur at the subject site include ephemeral and structural remains of 18th and 19th Century outbuildings/sheds, ephemeral agricultural remains, general discard items, and deep subsurface features (including cesspits, rubbish pits, artefactual deposits). These resources are associated with the agricultural usage of the subject site over time and are, therefore, likely to have research value for their ability to provide information into the agricultural use of the subject site, a period for which little information is available. Although these resources are also unlikely to be definitively attributable to a particular phase, they may provide a comparison with other continuously occupied agricultural sites in the area if retained with sufficient spatial and physical integrity and intactness.</p> <p>Additional archaeological resources include demolition material and structural remains of Gowan Brae House, the Burnside Orphan Homes and Australian Army Divisional Headquarters. These archaeological resources are associated with the residential occupation of the subject site and its transformation into an educational institution over time. Such resources may provide information regarding the adaptation of the site for institutional use.</p> <p>Deep features associated with Phase 1 and 2, including potential wells or cesspits, could also hold research value for their ability to provide insight into the use of the subject site during these periods. Such resources, should they occur, are unmapped and their materiality is not knowable from the historic record. Should deep features occur, they may also contain artefact rich fill deposits. These features and associated deposits could provide information regarding the use of the subject site and its occupants, including lifeways, occupations and diets depending on the nature and integrity of fill materials.</p> <p>On the basis of the above assessment, anticipated archaeological resources including structural remains, ephemeral evidence, general discard items and deep subsurface features with high integrity, would satisfy this criterion on a Local level.</p>
F - Rarity	<p>The archaeological resources anticipated to occur at the subject site include ephemeral and structural remains and general discard items. These archaeological resources are associated with the agricultural land use phases which span the last 200 years. There are many examples of similar-scaled agricultural sites in Parramatta, and the archaeological resources are therefore not considered rare.</p> <p>Structural remains, deep features and demolition material are also anticipated to occur, associated with the residential and educational land use phases. Whilst structural remains of the Burnside Orphan Homes may be considered rare within the Parramatta area, better preserved sites of equivalent scale and use are known to the broader Sydney context.</p> <p>Therefore, the potential archaeological resources of the subject site are not anticipated to meet the threshold for significance under this criterion at a Local or State level.</p>
G - Representativeness	<p>The archaeological potential of the subject site is limited and may include structural remains, demolition material, general discard items and deep features. These archaeological resources are associated with the site's agricultural land use phases</p>

Criterion	Discussion
	<p>which span the last 200 years, and its gradual transition from a residential to commercial/educational property during the 19th and 20th Centuries. Deep features associated with Phases 1 and 2 were likely backfilled with artefact-rich deposits and, therefore, may provide a connection to the past use of the site. Should these resources be retained with substantial intactness, they may be considered representative of the transition from agricultural to residential land use in Parramatta during the late-18th to early-19th Centuries. However, due to subsequent disturbance, they are not deemed likely to represent an outstanding example of archaeological assemblages of this kind.</p> <p>It is unlikely that other archaeological resources which may occur would be considered representative beyond their general ability to represent past occupation of the subject site through material remains, which can be said of any archaeological deposits.</p> <p>The archaeological resources which may occur at the subject site are not anticipated to satisfy this criterion on a Local or State level.</p>

1.2. STATEMENT OF SIGNIFICANCE

The above assessment has identified that archaeological resources associated with the early agricultural land use phases at the subject site would meet the threshold for significance on a Local level, should they occur with sufficient integrity, for their historic significance (criterion A) and research potential (criterion E). Although structural remains and deep features may occur associated with Phases 1 and 2, the majority of the anticipated archaeological resources comprise ephemeral remains - such as, post holes or crop marks. As such, they are unlikely to occur with sufficient integrity to be definitively attributed to these phases, as established in Section 5, and furthermore would likely be highly disturbed resulting from subsequent use. As such, it is not anticipated that significant archaeological relics would occur associated with this phase.

Archaeological remains of the Burns family residence including structural remains, deep features and evidence of landscaping would meet the threshold for significance on a Local level should they occur with high spatial and physical integrity. Despite some disturbance caused by subsequent developments, these remains would be considered Locally significant due to their historic significance (criterion A), associative significance (criterion B) and research potential (criterion E). The Burns family gravesite contains the *in-situ* burials of several of the Burns family members and is of significance for its historic and associative value.

The above assessment has also identified that structural remains associated with the Burnside Orphan Homes and Australian Army Divisional Headquarters would meet the threshold for significance on a Local level, for their social significance (criterion D).



Figure 65 – Map of historical archaeological potential and significance within the subject site. Potential relics contained within the subject site have been labelled and should be read with Table 10 below.

Table 10 – Key to Figure 65, indicating the archaeological potential and significance of the anticipated relics mapped in the above zoning plan.

Potential Relic	Description	Archaeological Potential & Significance
A	Horseshoe Dam	Moderate potential, Local significance
B	Gowan Brae Outbuilding (Phase 2)	Moderate potential, Local significance
C	The Hayshed (Phase 2)	Low potential, Local significance
D	Classroom facilities (Phase 3)	High potential, Local significance
E	Classroom facilities (Phase 3)	High potential, Local significance
F	The Stables (Phase 2)	Moderate-high potential, nil significance
G	The Kings School Sports Centre	Moderate potential, nil significance
H	Burns Family Grave Site (Phase 2)	High potential, Local significance
I	The Cedars (Phase 2)	Moderate potential, Local significance
J	Australian Army timber structures (Phase 3)	Moderate potential, Local significance
K	Australian Army timber structure (later, the Kings Preparatory School) (Phase 3)	Moderate potential, Local significance
L	Australian Army timber structures (Phase 3)	Moderate potential, Local significance
M	The Fernery (Phase 2)	Moderate potential, Local significance
N	Gowan Brae Drive & associated landscaping (Phase 2)	Low potential, Local significance
O	The Fountain (Phase 2)	Low potential, Local significance
P	The Aviary (Phase 2)	Moderate potential, Local significance
Q	The Gatehouse (Phase 2)	Low potential, Local significance

7. IMPACT ASSESSMENT

The following is an assessment of the likely impact of the proposed works on potential archaeological resources within the subject site. This assessment has concluded that there is high potential for archaeological resources of Local significance to occur including remains of the Burns family gravesite (Phase 2). Additionally, it concluded that the site holds low potential for Locally significant relics associated with Phase 3 to occur, including structural remains of the Burnside Orphan Homes and Australian Army Divisional Headquarters. The spatial distribution of these features is included in Figure 65. To inform this impact assessment, Urbis have considered the nature and location of potential relics of Local significance with reference to the proposed works at the subject site. Urbis note that the location of deep features such as wells or cesspits is not known as, should they occur, they are not present on historic maps. These features would likely occur to the rear of historic properties.

The below assesses the impact of each of Stage with reference to specific works proposed.

7.1. STAGE 1 – DETAILED DESIGN

7.1.1. Demolition

Stage 1 will involve demolition of ancillary structures to the rear of The Cedars and associated with the extant preparatory school to facilitate the construction of new Preparatory School buildings (discussed in Section 7.1.4). Structures proposed for demolition are located outside of areas of archaeological potential and are not anticipated to result in impact to relics, with no relics anticipated to occur in this area. It is therefore recommended that these works can proceed subject to the unexpected finds procedure detailed in Section 8 (recommendation 3).

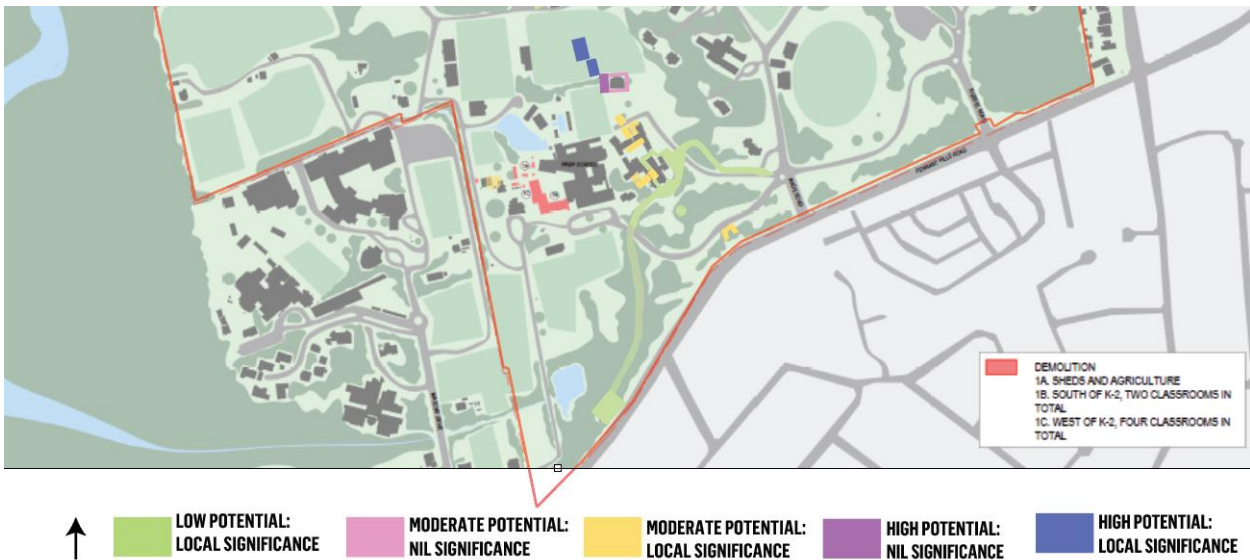


Figure 66 – Proposed demolition plan, overlaid on areas of archaeological potential
 Source: Urbis overlay on BVN, 2023

7.1.2. Road upgrades and construction

As part of the Stage 1 works, a new vehicular access road will be constructed to permit access from the west (through land owned by Tara Anglican School for Girls), as well as the construction of new and upgraded internal roads, footpaths and parking. The road is proposed to be constructed entirely outside of areas of identified potential (as per Figure 67) and therefore is not anticipated that these works would result in an impact to archaeological relics. It is therefore recommended that these works can proceed subject to the unexpected finds procedure detailed in Section 8 (recommendation 3).

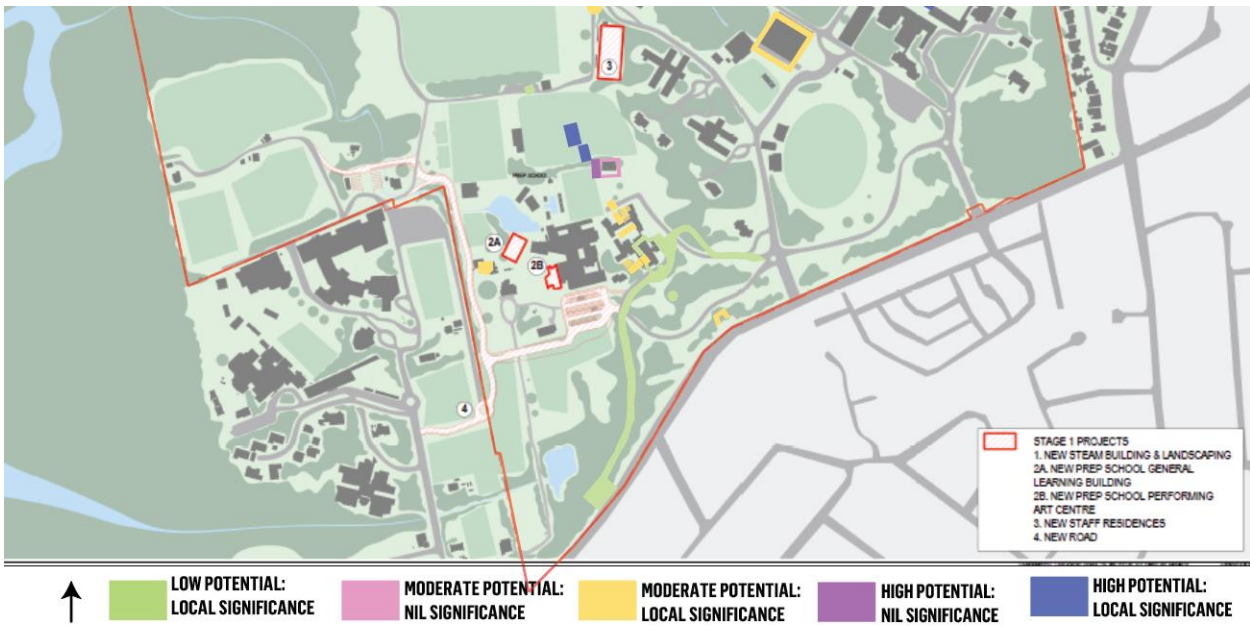


Figure 67 – Proposed road alignment overlaid on areas of archaeological potential
 Source: Urbis overlay on BVN, 2023

7.1.3. STEAM Building

The Stage 1 Detailed Design works include the construction of a new building for Science, Technology, Engineering, Arts and Maths (the ‘STEAM building’) within the Senior School (to the south of the existing Technology and Applied Sciences Centre and to the east of the Robert Lloyd Memorial Library) and associated landscaping. The STEAM building proposed to be constructed entirely outside of areas of identified potential (as per Figure 68) and therefore is not anticipated that these works would result in an impact to archaeological relics. It is recommended that these works can proceed subject to the unexpected finds procedure detailed in Section 8 (recommendation 3).

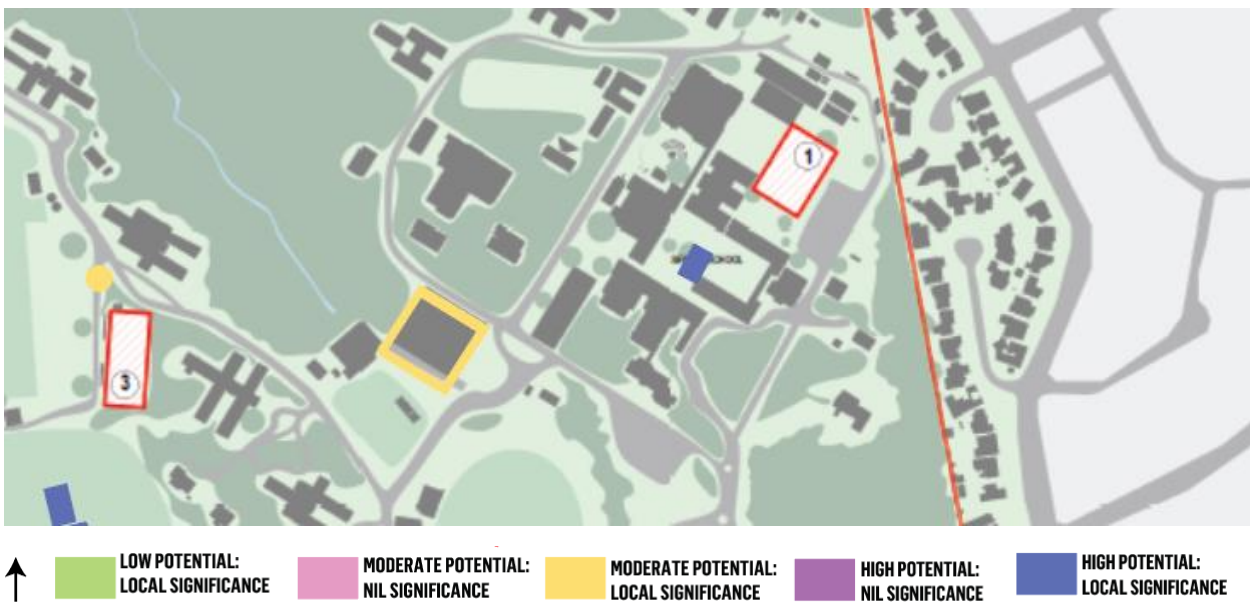


Figure 68 – Proposed steam building (indicated as Item 1) plan overlaid on areas of archaeological potential.
 Source: Urbis overlay on BVN, 2023

7.1.4. Stage 1 Preparatory School

The Stage 1 Detailed Design also includes the construction of building upgrades to the Preparatory School, including demolition (discussed in Section 7.1.1) and construction of a new General Learning Unit (GLU) building for Years 3-4 comprising additional classrooms / general learning spaces and break out spaces adjacent to the existing dam and the existing STEM building (to the north-east of the existing Agriculture Shed). These works will also include increased staff parking associated with the Road upgrades (discussed in Section 7.1.2). While there are areas within the broader Preparatory School campus which contain moderate potential for locally significant relics (including the footings of a potential former structure incorporated into the extant agricultural shed), the construction of the Preparatory School upgrades is not likely to impact these relics, being outside of their known area. Therefore, it is not anticipated that these works would result in an impact to archaeological relics. It is recommended that these works can proceed subject to the unexpected finds procedure detailed in Section 8 (recommendation 3).



Figure 69 – Proposed Preparatory School works (indicated as Item 2A and 2B) plan overlaid on areas of archaeological potential.

Source: Urbis overlay on BVN, 2023

7.1.5. Staff Residences

The Stage 1 Detailed Design also includes the construction of 9 new attached townhouses for Staff Residences within the footprint of four existing tennis courts to accommodate staff and their families within the Residential Precinct (to the south of Macarthur Waddy House and to the west of Baker Hake House) with associated landscaping and private parking. The staff residences are proposed to be constructed in an area within proximity to an area of moderate potential for the locally significant structural remains of former Gowan Brae outbuilding, however it is not anticipated that these works would result in any ground disturbance within this portion of the subject site (as indicated in Figure 70). Therefore, it is not anticipated that these works would result in an impact to archaeological relics. It is recommended that these works can proceed subject to the unexpected finds procedure detailed in Section 8 (recommendation 3).



Figure 70 – Proposed staff residences plan overlaid on areas of archaeological potential.
 Source: Urbis overlay on BVN, 2023

7.1.6. Summary of Impact – Stage 1

It is concluded herein that the Stage 1 works are **not likely** to result in impact to relics of Local significance which could occur at the subject site, being outside of areas of identified archaeological potential. The proposed Stage 1 works are not anticipated to impact archaeological relics and therefore are recommended to proceed subject to the unexpected finds procedure included in Section 8, Recommendation 3.

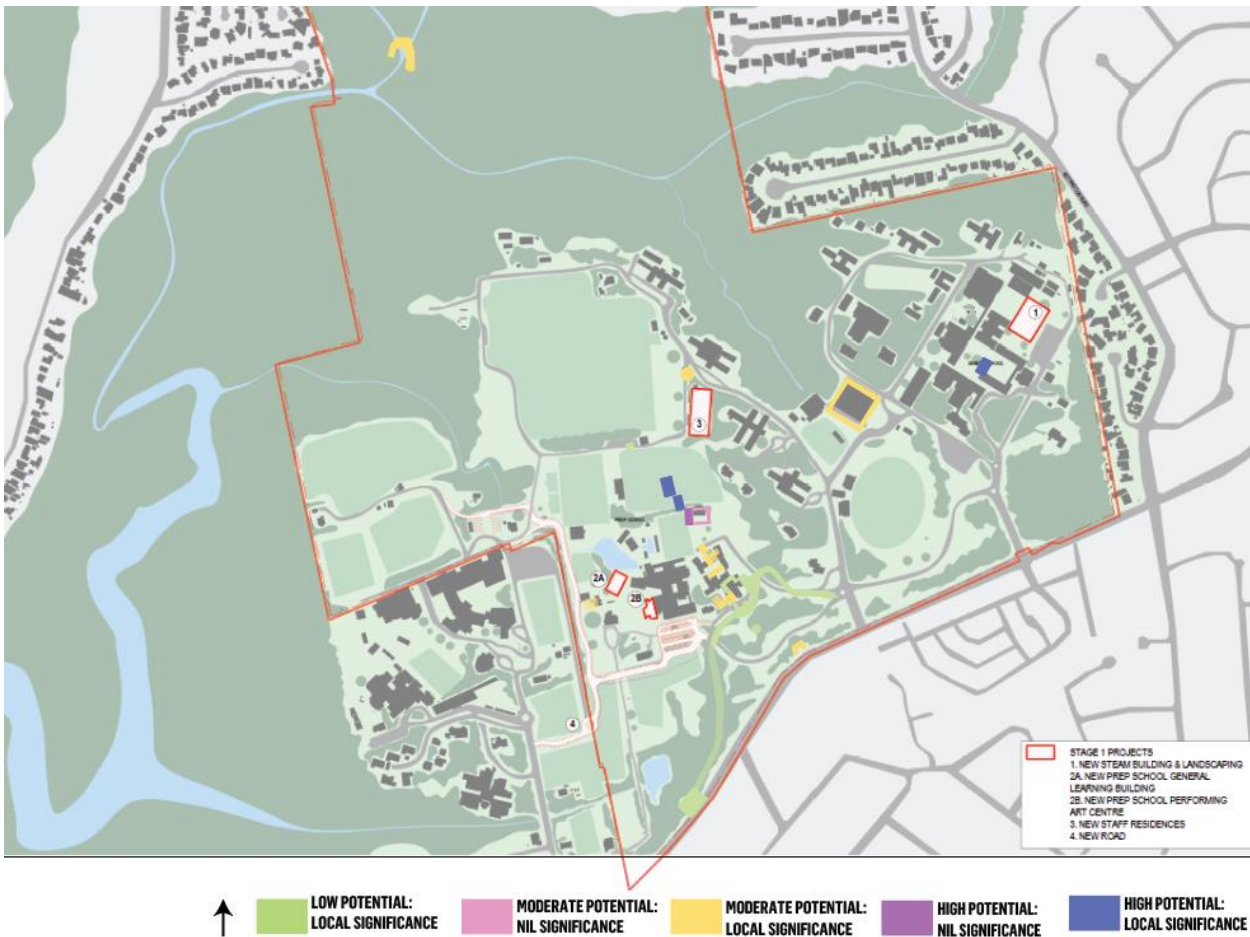


Figure 71 – Map of proposed Stage 1 detailed design works relative to areas of archaeological potential and significance.

Source: BVN 2023, with Urbis overlay

7.2. STAGE 2

Stage 2 works are also unlikely to impact archaeological relics of State or Local significance. Stage 2 works are largely located outside of areas of archaeological potential, and include the concept plans for a new sports pavilion to be located between the Wanderers' Field and Old Boys' Field and the Massie fields within the western sports field precinct (Item 6 in blue on Figure 72); A new Boarding House within the northern residential precinct (Item 7 in blue on Figure 72), and; a new Day Boy House for Year 7 students between Dalmas House and Burkitt House (Item 5 in blue on Figure 72).

It is recommended that the current report be updated at Stage 2 detailed design to ensure the conclusions remain correct, as detailed in Section 8, Recommendation 2.

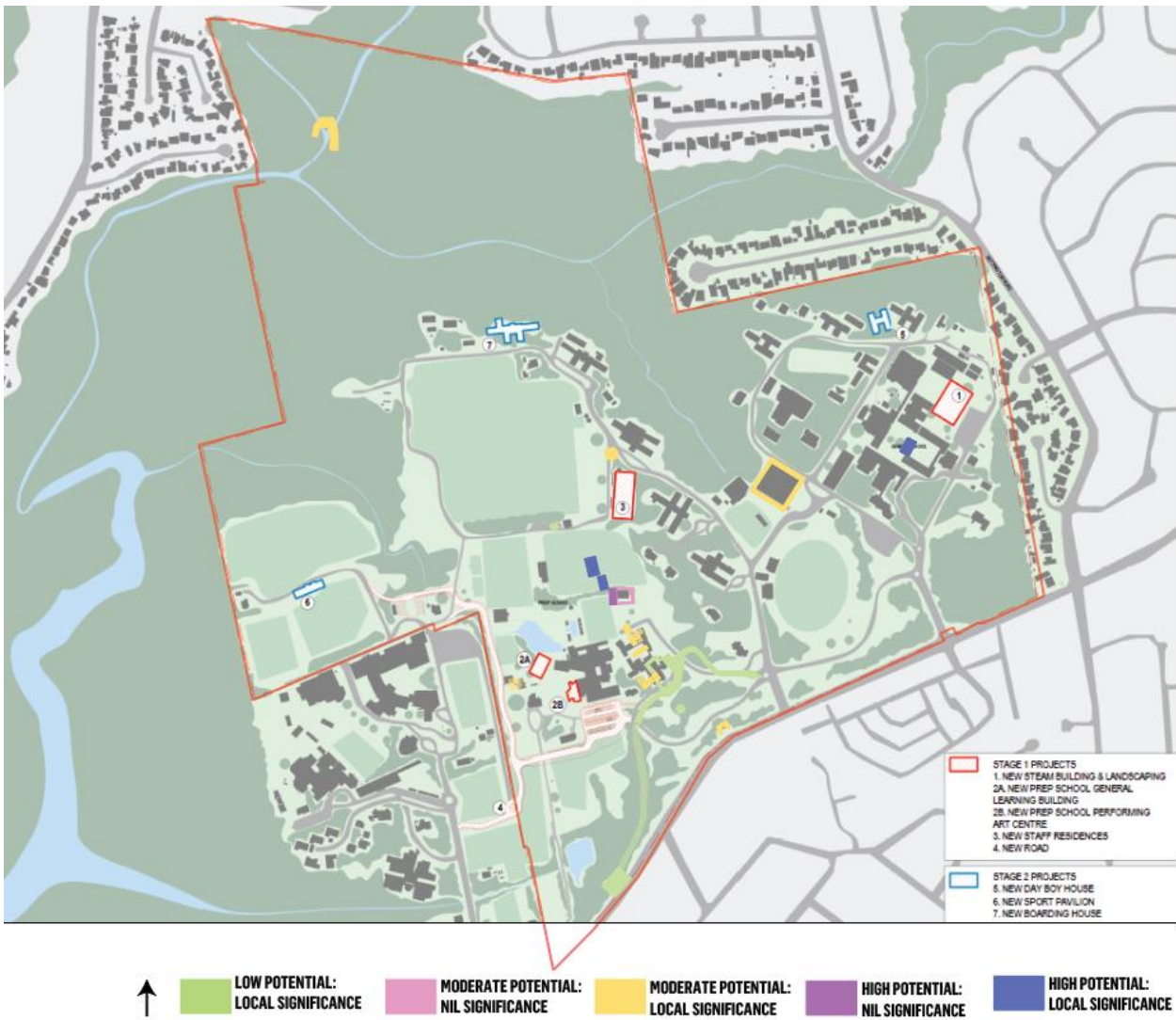


Figure 72 – Map of Stage 2 Concept Plan works relative to areas of archaeological potential and significance.

8. CONCLUSIONS & RECOMMENDATIONS

This HAIA has concluded the following in relation to the historical archaeological context of the subject site.

- There is **low potential** for archaeological resources to occur dating to Phase 1. Archaeological remains anticipated to occur from this phase include post holes and crop/plough marks.
- There is **low potential** for archaeological resources to occur dating to Phase 2. Archaeological remains anticipated to occur from this phase include demolition material, ephemeral remains and evidence of landscaping (including early road surfaces). There is, however, **high potential** for remains of the Burns family gravesite to occur in association with this occupational phase.
- There is **low-moderate potential** for archaeological resources to occur dating to Phase 3. Archaeological remains anticipated to occur from this phase include structural remains, demolition material and ephemeral evidence of agriculture.
- There is **low potential** for archaeological resources to occur associated with Phase 4. Archaeological evidence associated with this phase is anticipated to include demolition material.
- Archaeological resources associated with the early agricultural land use phases at the subject site would meet the threshold for significance on a Local level, for their historic significance (criterion A) and research potential (criterion E) should they survive with high integrity.
- Archaeological remains of the Burns family residence (and gravesite) including structural remains, deep features, evidence of landscaping and human remains would also meet the threshold for significance on a Local level. This is due to their historic significance (criterion A), associative significance (criterion B) and research potential (criterion E) should they survive with high integrity.
- Structural remains associated with the Burnside Orphan Homes and Australian Army Divisional Headquarters could meet the threshold for significance on a Local level, for their social significance (criterion D) should they survive with high integrity.

The following conclusions relate to the likelihood for impact to archaeological relics based on the above:

- The proposed Stage 1 works are **not likely** to result in impact to relics of Local significance which could occur at the subject site, being outside of areas of identified archaeological potential for significant relics.
- Stage 2 works are also unlikely to impact archaeological relics of State or Local significance. However, further assessment at the detailed design phase is required, with particular consideration to the level of ground disturbance proposed in these works.

8.1. RECOMMENDATIONS

In view of the above conclusions, Urbis makes the following recommendations:

1. A copy of this HAIA should be retained, with the archaeological zoning plan included as Figure 72 utilised as a reference figure for future development works at the site.
2. This report should be updated with reference to Stage 2 works at detailed design phase. This should include the provision of archaeological design advice at detailed design phase to mitigate the risk of impact to relics of Local significance.
3. The Stage 1 works should be subject to an archaeological unexpected finds procedure, including archaeological induction to contractors prior to works to ensure familiarity with archaeological resource types and legislative obligations. The unexpected finds procedure should include the following steps:
 - 3.1. Works must cease immediately in the area of the unexpected find and Urbis notified of the discovery. The area should be cordoned off with signage indicating this area as a no-go zone.
 - 3.2. Depending on the nature of the discovery, Heritage NSW may be notified in writing in accordance with Section 146 of the *Heritage Act 1977*. Additional assessment and possibly an excavation permit may be required prior to the recommencement of excavation in the affected area.
 - 3.3. Works cannot recommence in the area of the unexpected find prior to the receipt of written approval of the project archaeologist and, if required, Heritage NSW.

4. No works are proposed in the Burns Family Cemetery area and as such it is unlikely that human remains will be encountered. However, in the unlikely event that human remains are uncovered, the following procedure must be implemented:
 - 4.1. Works must cease immediately in the area of the unexpected find and Urbis/the project archaeologist notified. The area should be cordoned off with signage indicating this area as a no-go zone.
 - 4.2. The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW (Enviroline 131 555).
 - 4.3. The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.
 - 4.4. Management recommendations are to be formulated by the NSW Police, Heritage NSW and site representatives.
 - 4.5. Works are not to recommence until the find has been appropriately managed.

9. REFERENCES

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Urbis, 2022. *Heritage Impact Statement Assessment: Meriden Senior School, Strathfield Wangal Country SSD-39005127.*

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In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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