



O'CONNELL ST PUBLIC SCHOOL PARRAMATTA

(OLD KINGS SCHOOL SITE)

PROPOSED PLAYGROUND SHADE
STRUCTURES - BUILDING D

STATEMENT OF HERITAGE IMPACT

FOR THE DEPARTMENT OF EDUCATION
20 DECEMBER 2018

tonkinzulaikhagreer HERITAGE

1.0 INTRODUCTION

1.1 BACKGROUND

The Old Kings School site is located between O'Connell Street and Marist Place, Parramatta, overlooking the Parramatta River. The site contains a collection of buildings dating from 1836 to 1971 and includes buildings of exceptional heritage significance. The site also contains some highly significant landscape elements such as the large oval to the south that fronts the Parramatta River. The entire site is listed on the *State Heritage Register (NSW)*, and is subject to the provisions of the *NSW Heritage Act, 1977*.

The existing buildings on the O'Connell Street site have been adaptively re-used for a 1000 student public school, as approved by the NSW Office of Environment and Heritage. The school has been commissioned by the Department of Education (DOE) and opened at the beginning of 2018.

This report was commissioned by the Department of Education (DOE) to assess the heritage impacts of the proposed installation of shade structures in the playground adjacent to building D, (the former Dormitory building). The proposal will be assessed as a modification to the existing State Significant Development approval (SSD 15_7372) granted under Part 4 (Division 4.1) of the Environmental Planning and Assessment Act 1979 for the redevelopment of the State Heritage Register listed Old King's School site (SHR #00771 and #00826) into a new school - the O'Connell Street Public School.

Address:	O'Connell Street Public School 3 Marist Place, Parramatta NSW 2150 24A O'Connell Street, Parramatta NSW 2150
Real Property Description:	Parish of Field of Mars, Cumberland County Lot 1, DP 1112822, Lot 6, DP 1182647
Heritage Listings:	The property is listed on the NSW State Heritage Register as both Former King's School Group (SHR 00771) and Marsden Rehabilitation Centre (SHR 00826). The listing for the Marsden Rehabilitation Centre is broken down into several sub-listings (refer appendix).
Prepared by:	Julie Mackenzie, BSc(Arch)BArchMHeritCons, Registered Architect Rebecca Zulaikha, BFA(Hons)BLArchCHeritCons Tonkin Zulaikha Greer Heritage Ph: 92154900
Photographer:	Tonkin Zulaikha Greer Architects (unless noted otherwise)
For:	NSW Department of Education (DOE)

1.2 LIMITATIONS

Assessments of cultural significance made by others have been adopted for this report. In the opinion of the author, the recommendations in this report would not be materially altered by any further primary research.

1.3 TERMINOLOGY

This Statement of Heritage Impact has generally been prepared in accordance with the Heritage Office and Department of Urban Affairs and Planning publication, *Statements of Heritage Impact*, revised in 2002 (published as part of the *NSW Heritage Manual*). In order to achieve a consistency in approach and understanding of the meaning of conservation by all those involved a standardized terminology for conservation processes and related actions should be adopted. The terminology in *The Burra Charter* is a suitable basis for this.

The following terms apply to the historic fabric of the site and are included here to assist in understanding of the intent of the conservation requirements in this section.

- *Place* means site, area, land, landscape, building or other work, group of buildings or other works, and may include components, contents, spaces and views.
- *Cultural significance* means aesthetic, historic, scientific, social or spiritual value for past, present or future generations.
- *Fabric* means all the physical material of the place including components, fixtures, contents, and objects.
- *Conservation* means all the processes of looking after a place so as to retain its cultural significance.
- *Maintenance* means the continuous protective care of the fabric and setting of a place, and is to be distinguished from repair.
- *Repair* involves restoration or reconstruction.
- *Preservation* means maintaining the fabric of a place in its existing state and retarding deterioration.
- *Restoration* means returning the existing fabric of a place to a known earlier state by removing accretions or by reassembling existing components without the introduction of new material.
- *Reconstruction* means returning the place to a known earlier state and is distinguished from restoration by the introduction of new material into the fabric.
- *Adaptation* means modifying a place to suit the existing use or a proposed use.
- *Use* means the functions of a place, as well as the activities and practices that may occur at the place.
- *Compatible use* means a use, which respects the cultural significance of a place. Such a use involves no, or minimal, impact on cultural significance.
- *Setting* means the area around a place, which may include the visual catchment.
- *Related place* means a place that contributes to the cultural significance of another place.
- *Interpretation* means all the ways of presenting the cultural significance of a place.

1.4 THE STUDY AREA

The entire O'Connell Street Public School site is bounded by O'Connell Street to the west and Marist Place to the east. The southern boundary of the site fronts the Parramatta River, adjacent to the public riverside walk. The northern boundary is adjacent to St Patrick's Cathedral and grounds. The entire site covers an approximate area of 24,700m².

The site for the proposed shade structure is the playground located adjacent to Building D – the former Dormitory building, which has recently been converted to classrooms for Kindergarten to Year 2 children. The proposed site is shaded in red in the diagram below.



Figure 1: Site plan showing the location for proposed location of shade structure in red.
Source: TZG 2017.

2.0 SUMMARY OF STATUTORY CONTEXT

2.1 THE HERITAGE ACT 1977

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

The *Heritage Act* also protects 'relics', which can include archaeological material, features and deposits. Section 4(1) of the *Heritage Act* (as amended 2009) defines 'relic' as follows:

"relic means any deposit, artefact, object or material evidence that:
(a) relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement, and
(b) is of state or local heritage significance."

Under Section 57 of the *Heritage Act*, approval is required for works to an item listed on the SHR. Division 3, Subdivision 1 sets out the method by which approval should be sought and determination made. For works to a SHR item, a Section 60 application must be made for works that are not exempt under Section 57(2) of the *Heritage Act*.

Sections 139-145 of the *Heritage Act* prevent the excavation or disturbance of land known or likely to contain relics, unless in accordance with an excavation permit. Excavation permits are issued under Section 140 of the *Heritage Act*, or Section 60 for sites listed on the *State Heritage Register*. An Archaeological Research Design must support Excavation Permit Applications.

If the proposed works are minor and would have minimal impact on the heritage significance of the place or site, they may be granted an exception or exemption under Section 139 (4) of the *Heritage Act*.

The proposed shade structures are located within the curtilage of the Kings School Group site, which is listed on the State Heritage Register. The works do not qualify for exemption from approval under Section 57(2) of the Act. The proposal will be assessed as a modification to the existing State Significant Development approval (SSD 15_7372) granted under Part 4 (Division 4.1) of the Environmental Planning and Assessment Act 1979 for the redevelopment of the State Heritage Register listed Old King's School site (SHR #00771 and #00826) into a new school - the O'Connell Street Public School.

2.2 THE STATE HERITAGE REGISTER

The *State Heritage Register* (SHR) was established under Section 22 of the *Heritage Act* and is a list of places and objects that are considered important to the people of NSW. The SHR is administered by the Heritage Branch of the Office of Environment and Heritage and includes a diverse range of over 1500 items, in both private and public ownership. To be listed, an item must be deemed to be of heritage significance for the whole of NSW.

Sites or relics that are listed on the SHR (or are the subject of an Interim Conservation Order) are provided statutory protection under the *Heritage Act*. A Section 60 application can be determined by the Heritage Council of NSW, or in some cases the Heritage Division under delegation.

The proposal is located within the curtilage of SHR listed 'Kings School Group' (Former) (#00771) and 'Marsden Rehabilitation Centre Group' (#00826) and therefore subject to the provisions of the *Heritage Act*.

2.3 ABORIGINAL ARCHAEOLOGICAL HERITAGE

The National Parks & Wildlife Act 1974 (the NPW Act) provides statutory protection for all Aboriginal 'objects' (consisting of any material evidence of the Aboriginal occupation of NSW) and for 'Aboriginal Places' (areas of cultural significance to the Aboriginal community) under Section 86 of the NPW Act. Aboriginal objects are afforded automatic statutory protection in NSW whereby it is an offence to:

'damage, deface or destroy Aboriginal sites without the prior consent of the Director-General of the National Parks and Wildlife Service (now the Office of Environment and Heritage [OEH])'.

The NPW Act defines an Aboriginal 'object' as:

'any deposit, object or material evidence (not being a handicraft for sale) relating to indigenous and non-European habitation of the area that comprises New South Wales, being habitation before or concurrent with the occupation of that area by persons of non-Aboriginal European extraction and includes Aboriginal remains'.

The NPW Act is administered by the Office of Environment and Heritage (OEH), formerly the National Parks and Wildlife Service (NPWS). The Chief Executive of the OEH is the authority responsible for the protection of all Aboriginal objects and place in NSW, whether they are on a national park estate or not.

Under Section 90 of the NPW Act it is an offence to harm, deface, damage, remove or desecrate, an Aboriginal object or place without prior written consent of the Chief Executive of OEH. It is also an offence, under Section 86 of NPW Act to disturb or excavate land for the purpose of discovering an Aboriginal object, or disturb or move an Aboriginal object on any land, without first obtaining a permit (preliminary research permit, excavation permit, collection permit or rock art recording permit) under Section 87 of the NPW Act. Under Section 91 of the NPW Act, it is also a requirement to notify the Chief Executive of the OEH of the location of an Aboriginal object identified during any phase of works.

If any Aboriginal cultural remains are exposed during works, then all work would need to be ceased until an appropriate s87 or s90 permit has been obtained and Aboriginal community consultation has been undertaken.

2.4 HISTORICAL ARCHAEOLOGICAL HERITAGE

Historical archaeological relics are protected by the *Heritage Act 1977*, which is administered by the Heritage Division of OEH. In this case, the study area is also within the curtilage of an item listed on the *State Heritage Register (SHR)*, which also provides protection under the *Heritage Act*.

The results of previous historical archaeological assessments indicate that there is low potential for the presence of significant historical archaeological remains, or relics, in the northern part of the site.

2.5 PARRAMATTA LOCAL ENVIRONMENTAL PLAN 2011

The current study area falls within the boundaries of the Parramatta Council local government area. Amendment No.10 to *Parramatta Local Environmental Plan 2011 (PLEP 2011)* came into effect on Friday 18 December 2015. The amendment consolidated Council's two LEPs by including the land previously covered by *Parramatta City Centre LEP 2007* within *PLEP 2011*. A new part (Part 7) of *PLEP 2011* now contains special provisions relating to the City Centre. The site is located within the curtilage of the Marsden Rehabilitation Centre and in close proximity to a number of State Heritage Items listed in *Schedule 5 – Environmental Heritage of Parramatta LEP 2011*.

Item #	Parramatta LEP 2011 - Schedule 5 Item	Significance
#I00826 / #0771	Marsden Rehabilitation Centre (and potential archaeological site)	State
#I00596	Parramatta Regional Park	State
#I00238	St Patrick's Cathedral, presbytery (and precinct and potential archaeological site)	State
#I732	Parramatta Dam archaeological site weir	State
#I686	Alfred Square (and potential archaeological site)	State
#I736	Former St Andrew's Uniting Church, hall (and potential archaeological site)	State
#A12	Parramatta hospital archaeological site (opposite side of the River)	State
#I00059 / I0828	Brislington property, Moreton Bay Fig tree and potential archaeological site	State

Table 1: Table of heritage items, including the subject site and those in the vicinity listed in *Parramatta LEP 2011*.



2.7 NON STATUTORY HERITAGE LISTINGS

Listing on non-statutory registers does not provide any legal protection to heritage items or sites, however demonstrates the recognised heritage value of items.

2.7.1 Register of the National Trust

The *Register of the National Trust* was established in 1949 and is maintained by the National Trust of Australia. Following its survey and assessment of the natural and cultural environment, the National Trust of Australia (NSW) maintains a Register of landscapes, townscapes, buildings, industrial sites, cemeteries and other items or places which the Trust determines have cultural significance and are worth of conservation.¹

Currently, there are some 12,000 items listed on the Trust's *Register*. They are said to be Classified and Marsden Rehabilitation Centre (Former King's School) Group is included on this *Register* as item #S8886.

2.7.2 Register of the National Estate

The *Register of the National Estate* is a list of some 13,00 places of natural, Indigenous and historic significance throughout Australia that was originally established under the *Australian Heritage Commission Act 1975*. The *Register of the National Estate* ceased to be a statutory register in 2012 and is now maintained on a non-statutory basis as a publicly available archive and educational resource.² Kings School Group (Former) is listed on the *Register of the National Estate* as item #14290.

¹ <http://www.nationaltrust.org.au/nsw/heritage-register>

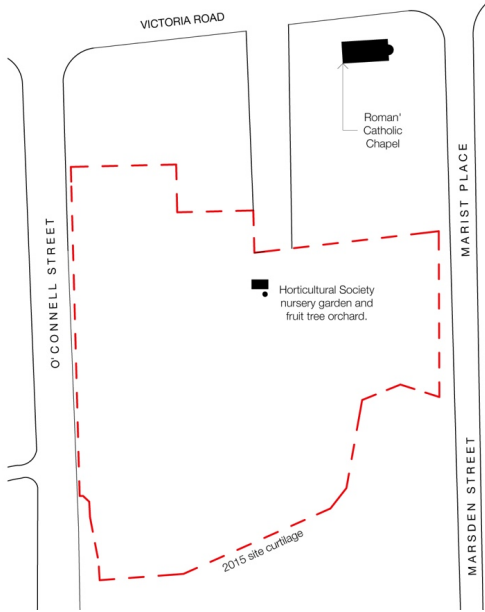
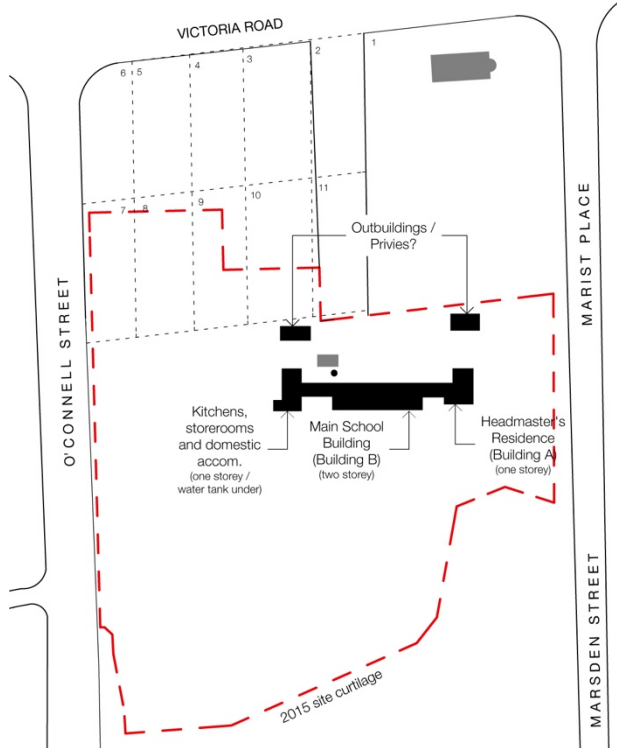
² <http://www.environment.gov.au/topics/heritage/heritage-places/register-national-estate>

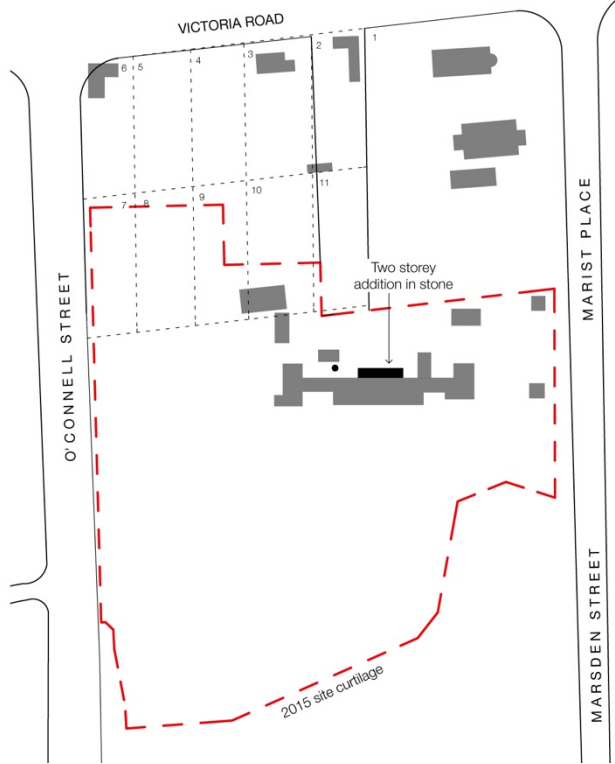
3.0 HISTORICAL CONTEXT

3.0 HISTORICAL SUMMARY

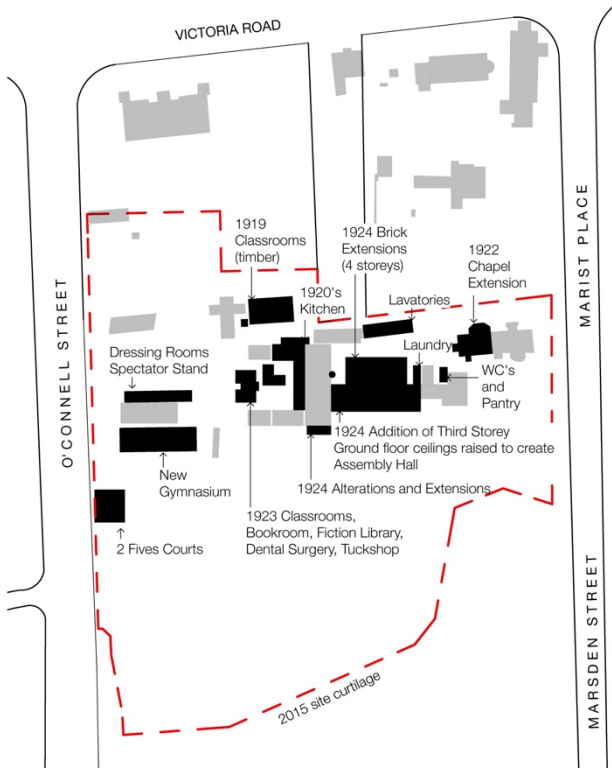
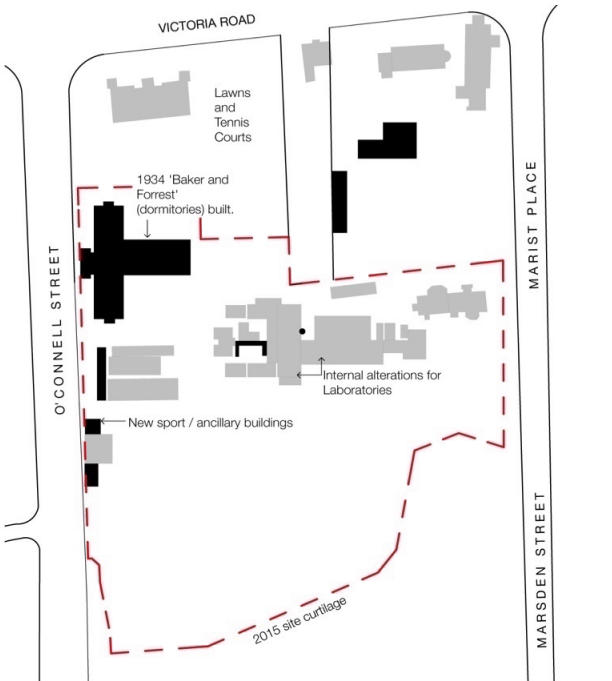
The *Statement of Heritage Impact for the O'Connell Street Primary School SSDA*, prepared by TZG Heritage in 2016 contains a detailed historical chronology for the site. Relevant sections have been extracted and summarised here in relation to the development of the proposed shade structure to the playground adjacent to Building D, (the former Dormitory building).

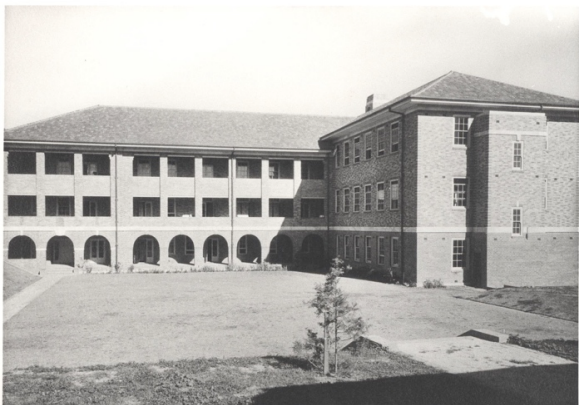
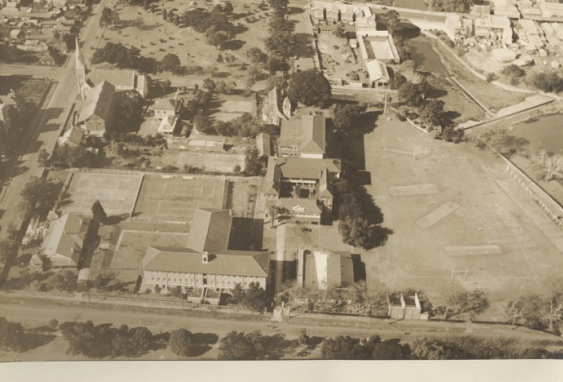
Date	Event	Image and/or Source
1806	The Old Kings School site was originally part of a 105 acre grant given to William Bligh by Governor King, known as 'Mount Betham'.	 Figure 3: Macquarie, Lachlan, 1761-1824 & Bligh, William, 1754-1817 & Bathurst, Henry Bathurst Earl, 1762-1834 1915, <i>Plan of the Township of Parramatta in New South Wales 1814 (Extract)</i>, State Library of NSW, Digital Order No. a1528520, Call No. M2 811.1301/1814/1
1819	Bligh's grant was resumed by Governor Macquarie and the land divided and granted for other purposes.	<i>Marsden Rehabilitation Centre (Former King's School) Parramatta Conservation Plan</i> prepared by Peddle Thorp Architects for NSW Health Department, May 1994, p8.
c1823	The Agricultural and Horticultural Society was given some of the land to establish a nursery garden and fruit tree orchard. The Society cleared, fenced and constructed necessary buildings. By 1833 competition with other commercial nurseries in the area had deemed it unprofitable for the Society's nursery to continue operations. The extent of the Society's buildings on the land is unknown, however included 'suitable buildings', a water tank and trenching for crops.	<i>CMP</i> , 1994, p8.
1830	Archdeacon Broughton put forward a proposal to Governor Darling to establish 'The King's School' at Sydney and Parramatta.	<i>CMP</i> , 1994, p21.
1831	Plans were approved for the establishment of a building and grounds for a School. The building was to be of the 'plainest and most economical description.'	<i>CMP</i> , 1994, p21.

Date	Event	Image and/or Source
1834	The Headmaster of The Kings School, Mr. Forrest received from the Surveyor General 'the house and ground lately belonging to the Agricultural and Horticultural Society'.	 Figure 4: Plan showing phases of development, c1834 Tonkin Zulaikha Greer Architects, adapted from 1994 <i>Conservation Management Plan</i>. CMP, 1994, p8.
1836	Building commenced in 1834 following a successful tender for £2350, and was completed in January 1836 - ready for occupation. The architect was Ambrose Hallen. The original building comprised a two storey stone main building with shingle roof and stone slab floor.	 Figure 5: <i>Elevations Through Time, 1836 - Built at Government Cost on Granted Land. Rev. Robert Forrest, Headmaster 1832 - 1836 & 1848 - 1855, Kings School Group (Former), Land & Property Information, NSW Government - Heritage Sites and Assets.</i> CMP, 1994, p10. 

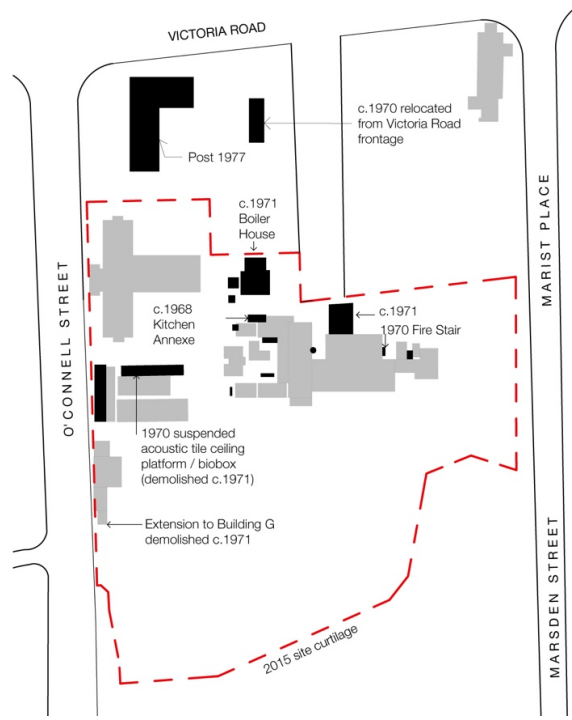
Date	Event	Image and/or Source
		Figure 6: Plan showing phases of development, c1837. Tonkin Zulaikha Greer Architects, adapted from 1994 <i>Conservation Management Plan</i>.
1852		1852 EXTENSIVE ADDITIONS BY BACK AND F. K. H. H. 1852 - 1864  Figure 7: <i>Elevations Through Time, 1852 – Extensive additions at back</i>, Kings School Group (Former), Land & Property Information, NSW Government – Heritage Sites and Assets.  Figure 8: Plan showing phases of development, c1855-60, Tonkin Zulaikha Greer Architects, adapted from 1994 <i>Conservation Management Plan</i>.

Date	Event	Image and/or Source
1891	Relocation of the school to a larger site was considered. Draft plans for rebuilding the school were submitted to Council by Sulman & Power. Pre-1892, Allotments 5,6,7 and 8 were purchased by the Council of The King's School.	Figure 9: Plan showing phases of development, c1886-95 Tonkin Zulaikha Greer Architects, adapted from 1994 <i>Conservation Management Plan</i>.
1898	The original grant plus allotments 3, 4, 9 and 10 were purchased under the <i>Real Property Act</i>. Cyril Blacket was appointed as School Architect for future repairs and improvements to school buildings.	CMP, 1994, p9 and p26.
1919 – 1932	Extensive building activity and remodelling included the construction of a timber classroom block at the rear of the Main Building (known as 'Taronga Block') and three other classrooms on the lawn south of the tennis courts.	CMP, 1994, p28.

Date	Event	Image and/or Source
		 Figure 10: Plan showing phases of development, 1920s, Tonkin Zulaikha Greer Architects, adapted from 1994 <i>Conservation Management Plan</i>.
1933-1934	A Masterplan was developed for the present and future needs of the school by Power, Adam & Munnings. Only one aspect of this Masterplan eventuated - Construction of new quarters was undertaken for boarders facing O'Connell Street (school houses Baker and Forrest), referred to as Building D (former dormitory building) in this report. The building was ready for occupation in 1934. The old Cottage Hospital, which had been science rooms was demolished as were temporary classrooms to east.	 Figure 11: Plan showing phases of development, 1934, Tonkin Zulaikha Greer Architects, adapted from 1994 <i>Conservation Management Plan</i>.

Date	Event	Image and/or Source
		 Figure 12: School House Baker and Forrest with bowling green, undated (Building D – former dormitory building). Source: King's School Archives. <i>CMP</i>, 1994, p29.
1938	The first aerial view shows the recently completed Baker and Forrest School House off O'Connell Street (Building D – former dormitory building), with tennis courts to the rear and a bowling green to the north. The buildings in Group C can also be clearly identified.	 Figure 13: Aerial view above O'Connell Street, G. Herborn, 1938. Source: King's School Archives A4607.  Figure 14: Aerial view above O'Connell Street, G. Herborn, 1938. Source: King's School Archives A4607.

Date	Event	Image and/or Source
		 Figure 15: Aerial view looking north east across the site (taken from above the Parramatta River), G. Herborn, 1938. Source: King's School Archives A4607.  Figure 16: Aerial view looking north with the Parramatta River in foreground and subject site behind, G. Herborn, 1938. Source: King's School Archives A4607.
1962 - 1968	In 1962 the first part of the Senior School moved to the new site, 'Gowan Brae' and by 1968 relocation of the entire school had taken place. The Chapel was methodically taken apart and reconstructed at the new site.	

Date	Event	Image and/or Source
		 Figure 17: Plan showing phases of development, 1960s – 1990s Tonkin Zulaikha Greer Architects, adapted from 1994 <i>Conservation Management Plan</i>. CMP, 1994, p31.
1964	In 1964 the old school site and buildings were sold to the NSW Department of Health for use as a training centre for the intellectually challenged known as the Marsden Rehabilitation Centre.	Kings School Group (Former) Source: NSW Environment and Heritage Office, Database Number 2242625.
1972	The Marsden Rehabilitation Centre moved onto the site.	<i>Marsden Rehabilitation Centre Group</i> listing, NSW Environment and Heritage, p16.
1994	The Marsden Rehabilitation Centre (Former King's School) Conservation Plan was prepared by Peddle Thorp Architects for the NSW Health Department.	
2002	Marsden Rehabilitation Centre was progressively closed and Building's C, D, E, F, G and H were vacated.	
2003	The Marsden Rehabilitation Centre was wound back and most of its clients were relocated to alternative community based accommodation. As a result many of the buildings became redundant. The Marsden Rehabilitation Centre was officially closed c.2004. The original Headmaster's Residence (Building A) and the Main School Building (Building B) were refurbished. Building A was leased as professional	

Date	Event	Image and/or Source
	office space whilst Building B accommodated the Heritage Division of the NSW Department of Environment and Heritage.	
2005	Former King's School/Marsden Rehabilitation Centre, Conservation Plan Addendum prepared by Godden Mackay Logan for the NSW Department of Commerce. Endorsed by NSW Heritage Office, May 2005.	
2006	Revised Masterplan Guidelines for Marsden Rehabilitation Site, Parramatta prepared by Tanner Architects endorsed by NSW Heritage Office June 2006.	
2011	Former Marsden Hospital Parramatta (old Kings School), Heritage Impact Statement, Proposed Subdivision of NW Corner, Proposed Right of Way prepared by Public Works, Government Architects Office.	
2014 - 2015	The Department of Education acquired the site for the creation of the new O'Connell Street Public School. The NSW Government Architect's Office prepared a Masterplan for the site. In 2015 Tonkin Zulaikha Greer Architects were engaged to design the new O'Connell Street Public School on the site including the adaptive re-use of the buildings identified as having heritage significance.	 Figure 18: Aerial view of subject site taken by Sky View Aerial, 2015.
2018	Site reopened as O'Connell Street Public School. Completed project won NSW RAIA Heritage Award.	 Figure 19: O'Connell Street Public School, 2018. Source: TZG Architects, Photographer: Brett Boardman.

4.0 SITE DESCRIPTION

4.1 DESCRIPTION OF THE PLAYGROUND AREA

The shade structures are proposed to be installed within the recently constructed school playground area which serves children from Kindergarten to Year 2. The playground is a rectangle-shaped courtyard space bounded by the walls of Building D, (the former dormitory building), on the southern and eastern boundaries. The boundaries on the west and north are defined by new metal palisade fences.

The landscaping to the playground was approved as part of the original SSD and includes a metal slide, sandpit area and eco learning garden. The southeastern part of the site has artificial turfed terraces, which step down from the adjacent sports area. The groundplane is a playful combination of colourful softfall and asphalt.

An original Frangipani tree has been retained on the southern boundary of the playground, and currently provides the only shade within the playground.



Figure 20: Playground area (looking south).
Source: Brett Boardman, 2017.



Figure 21: Playground area (looking west).
Source: Brett Boardman, 2017.

5.0 HERITAGE SIGNIFICANCE

5.1 OVERVIEW OF HERITAGE SIGNIFICANCE

The site is identified on the State Heritage Register as a place of State heritage significance. A detailed discussion of the heritage significance of the entire site is contained within the *O'Connell St Primary School, Parramatta, Statement of Heritage Impact* (SOHI) submitted as part of the State Significant Development Application, prepared by Tonkin Zulakha Greer Heritage dated 22nd September 2016.

The 1994 *Marsden Rehabilitation Centre (Former Kings School) Conservation Management Plan*, prepared by Peddle Thorp Architects, identified the area of open space, which includes the recently constructed playground, as having High significance, for it's contribution in creating an overall park like setting.

The *State Heritage Register* Listing for the Marsden Rehabilitation Centre Group (#00826) contains the following Statement of Significance for the Landscape areas over the entire site:

Item name	SHR Listing No.	Statement of Significance
Marsden Rehabilitation Centre - Landscape	00826	Of environmental significance to the setting of the Marsden Rehabilitation Centre. The site is one of two surviving examples along the Parramatta River of the picturesque siting principles of the 18th and 19th centuries by which large building groups were sited on the brow of a hill overlooking sloping land bordering a river. The site is evidence of the role of major social institutions in the evolution of the physical and cultural framework of the regional town of Parramatta during the nineteenth century. The site was under cultivation early in the colony's history and was used in the 1820s for the acclimatisation and development of exotic fruit trees when Australia's first Agricultural Society was formed in Parramatta (1822) and was given this land by its president, Governor Brisbane as an experimental garden to grow new varieties of plants and trees. (Peddle Thorp 1994:81) Sporting activities were also considerably developed largely due to the enthusiasm of WR Burkitt. Rugby was introduced in 1870, the first tennis courts were constructed and the playing field in Parramatta Park was levelled, all with the assistance of boys from the school. There is little evidence of any significant attempt at landscape design in the grounds. The dominant landscape feature was the school itself in its setting. (Peddle Thorp 1995:40)



Figure 22: Gradings of Significance Diagram. Location of subject site outlined in blue.
Source: TZG based on CMP.

5.2 ABORIGINAL HERITAGE

The *O'Connell Street Parramatta: Aboriginal Heritage Impact Assessment Report* prepared by AHMS (now Extent) in May 2016 identified the northern part of the entire site, including the subject site, as having Low potential impact to aboriginal heritage.

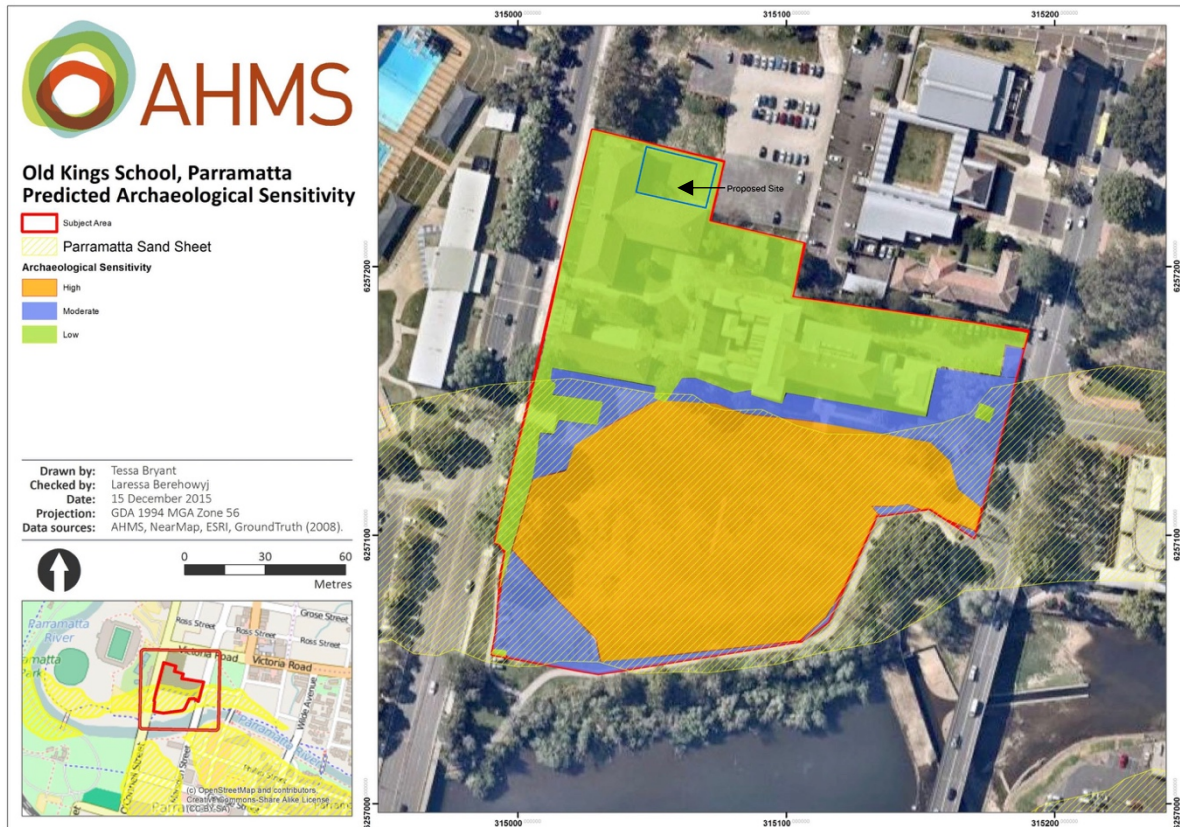


Figure 23: Plan of Predicted Archaeological Sensitivity (for Aboriginal Heritage). Subject site is outlined in blue.

Source: *Old Kings School, Parramatta: Aboriginal Heritage Impact Assessment Report*, AHMS (now Extent), May 2016, P.42.

5.3 HISTORICAL ARCHAEOLOGY

A report entitled *Statement of Heritage Impact for Historical Archaeology* was prepared by AHMS (now EXTENT) in 2016 to accompany the SSDA.

The following diagram from the AHMS report identifies that the subject site has no known significance in terms of potential historical archaeology.

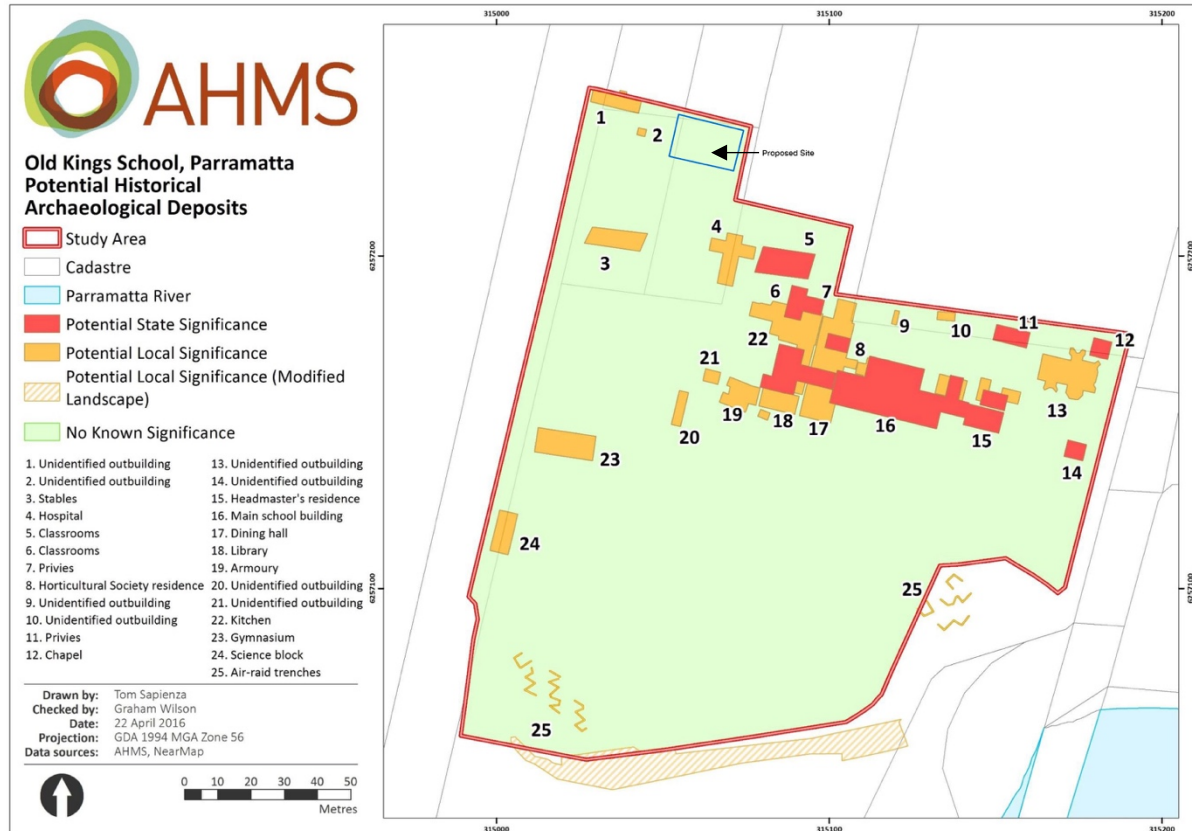


Figure 24: Plan of Potential Historical Archaeological Deposits. Subject site is outlined in blue.

Source: *Old Kings School, Parramatta: Statement of Heritage Impact for Historical Archaeology*, AHMS (now Extent), May 2016, P.25.

6.0 THE PROPOSAL

6.1 PROPOSAL

The proposal involves the installation of shade structures over the playground area adjacent to Building D (former dormitory building) to provide sun protection for the student's of O'Connell Street Public School in accordance with NSW Department of Education sunsmart guidelines. The DoE website states:

Schools have a responsibility to provide a safe environment for students, including providing adequate protection from the sun.³

The proposed shade structures occupy an area of approximately 16.3m x 27.5m and are proposed to be constructed in two parts. This area is the minimum required to cover the metal slide and the sandpit. The proposed works include:

- Ground preparation, excavation and construction of four 600mm diameter pile footings to a maximum depth of 2500mm.
- Installation of four steel posts to new concrete pile footings and one steel post to existing concrete retaining wall – colour Dulux Oriental Blue T22
- Installation of two commercial grade shade cloths – one rectangular, one triangular – colour Comshade Xtra 'Navy Blue'

The shade structures have been designed to read as secondary elements which defer to Building D as the primary element. The posts of the shade structures vary in height between 2.6m to 4m to suit the topography. The maximum overall height of the structure at the ridge is 6.2m.

The following images from the Sun Shade Australia website⁴ and show the concept of the proposed shade structure:



Figure 25: Images of similar shade structures in a playground situation. Sun Shade Australia website.

Construction drawing's of the proposal prepared by Northrop Engineers in November 2018 are included on the following pages.

The shade structures will be obscured from views towards the site from O'Connell Street through a combination of mature trees along the O'Connell Street boundary and by the bulk of the adjacent Building D (former dormitory building).

³ <https://www.det.nsw.edu.au/wellbeing/thrive/sun-safety-for-students>

⁴ <https://www.sunshade.com.au/playgrounds.php?id=03> (accessed 11/12/19).

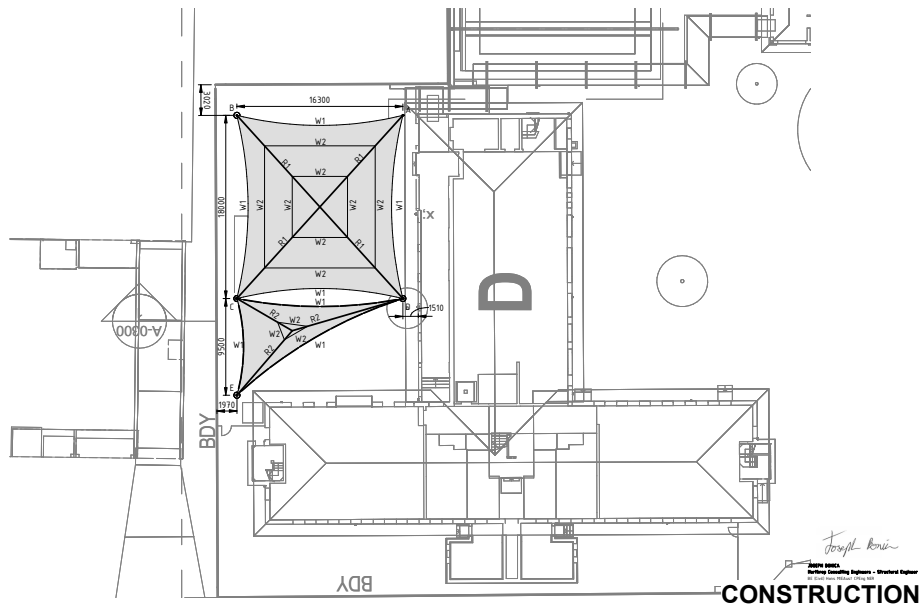


Figure 26: Location Plan.
Source: Northrop, 2018.

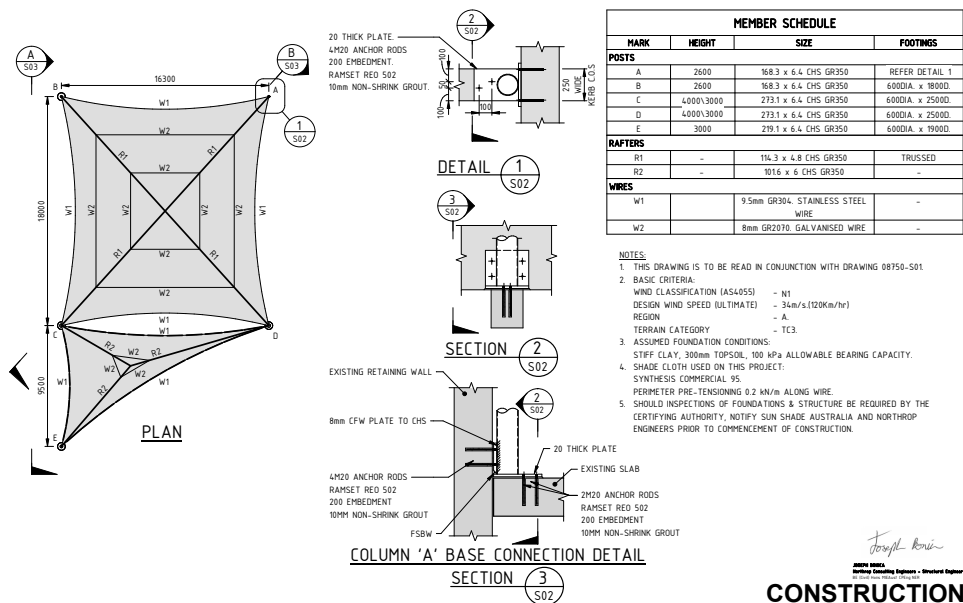


Figure 27: Structural Framing Plan.
Source: Northrop, 2018.

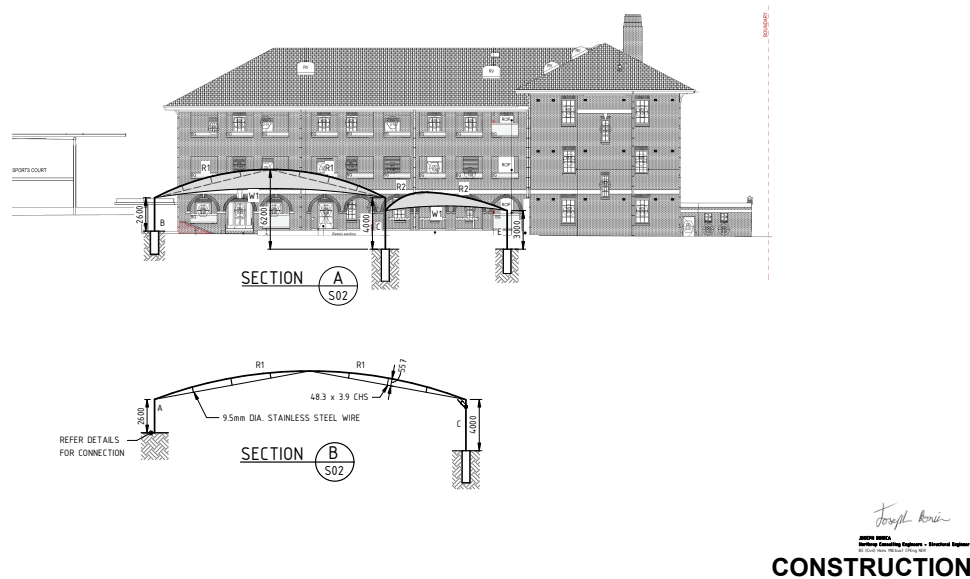


Figure 28: Structural Framing Elevations.

Source: Northrop, 2018.

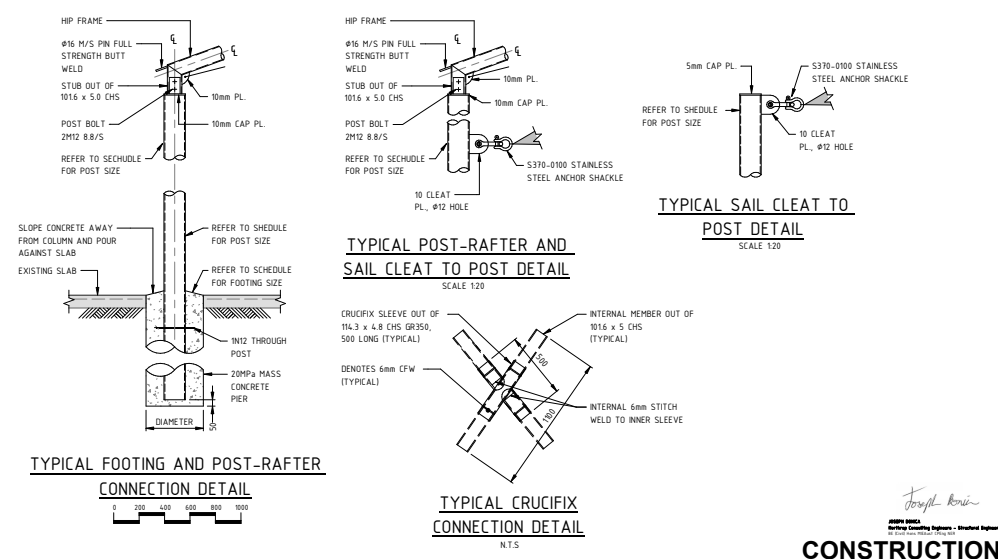


Figure 29: Typical Structural Details.

Source: Northrop, 2018

6.2 OPTIONS CONSIDERED

An option for reducing the size of the shade structure to align with the northern wall of Building D, in accordance with the GML Conservation Management Plan Addendum, was considered. This was discounted as it would have significantly reduced the overall amount of shade, making a large area of the playground, including the metal slide and sandpit, unuseable in summer.

The proposed shade structures are set back from O'Connell Street, behind mature trees and substantially lower than Building D to minimise their visual impact. The shade structures do not extend past the northern end of Building D and hence will not be visible from the oval. The heritage impact of the proposed shade structures, in their current form will be minimal, particularly as they are distinctly contemporary and reversible.

7.0 ASSESSMENT OF HERITAGE IMPACT

7.1 CONSERVATION POLICY

The following policies have been extracted from the *Marsden Rehabilitation Centre (former King's School) Conservation Plan* (1994), and the *Conservation Plan Policy Addendum* to the above Plan prepared by Godden Mackay Logan in 2005. They relate specifically to the proposed installation of shade structures in the playground area adjacent to Building D, (the former Dormitory building).

Policy No.	Policy	Comment
7.3.1 General Policies		
<i>Policy 1.1</i>	<i>The future conservation and development of the place should be carried out in accordance with the principles of the Australia ICOMOS Burra Charter for the Conservation of Places of Cultural Significance (Burra Charter) as revised in 1999.</i>	The principles of the <i>Australia ICOMOS Burra Charter</i> (2013) have been, and will be implemented throughout the course of the installation project.
<i>Policy 1.2</i>	<i>The statement of cultural significance and levels of heritage significance set out in Section 6.4, 6.5 and 6.6 should be accepted as one of the bases for future planning and work.</i>	The proposal recognizes the heritage status of the subject site as being part of the overall setting identified as having High Significance. The proposed installation of shade structures will have minimal impact on the significance of the subject site, and its contribution to creating an overall park like setting.
<i>Policy 1.3</i>	<i>The policies recommended and options discussed throughout this document should be endorsed as a guide to future planning and work.</i>	The <i>Conservation Management Plan</i> and subsequent <i>Addendum</i> have been endorsed by the NSW Heritage Council. The conservation policies have been used to guide the design and installation of the shade structures, so as to minimise the impact on the heritage significance of the subject site. It is not practical to construct the shade structures within the plan outlines established in the CMP Addendum in terms of not extending past the northern end of Building D. The shade structures comply in all other regards - they do not extend past the eastern end of Building D nor exceed the height of the building. It is argued that mature trees will obscure views of the proposed shade structures from O'Connell Street. Further, they have been designed as distinctly contemporary secondary elements which are reversible in accordance with the ICOMOS Burra Charter.
7.3.2 Future Uses		
<i>Policy 2.1</i>	<i>The policies of this document should be applied irrespective of the future uses of the place.</i>	The policies of the <i>Conservation Management Plan</i> (1994 / 2005) have been considered in detail and applied, wherever relevant, to the proposal.
<i>Policy 2.2</i>	<i>The preferred use is an institution which: - continues the site's role as a major element of the community; - requires the least disruption to the character and significance of the buildings and their setting; - makes use of the major internal spaces and external spaces, in their original or early form.</i>	The reinstatement of a school on the site is in accordance with this policy, and has allowed for a primary aspect of the site's significance, relating to the original use of the site, to be reinstated. The new shade structures are required for sun protection of the children and have been designed as distinctly contemporary elements which are reversible.

Policy No.	Policy	Comment
		The proposed shade structures will have minimal disruption to the character and significance of the existing buildings and their setting.
<i>Policy 2.3</i>	<i>New uses should be selected which are most compatible with the retention and recovery of the character and significance of the place.</i>	Refer above.
<i>Policy 2.4</i>	<i>Uses with service or subdivision requirements, which would have a strong adverse effect on the character and significance of the place are unacceptable. Examples of unacceptable uses have been identified in the Conservation Plan.</i>	Not applicable.
<i>Policy 2.5</i>	<i>Uses with service or subdivision requirements, which have potential adverse implications for the management or refurbishment of the buildings, should be avoided.</i>	Not applicable.
<i>Policy 2.6</i>	<i>New uses should be sympathetic to the scale, character and assessed significance of the buildings and external spaces.</i>	The shade structures are distinctly contemporary in design and are fully reversible. The ephemeral nature of the shade structures will have minimal impact on the scale, character and assessed significance of the existing buildings and external spaces.
<i>Policy 2.7</i>	<i>The oval should continue to be open space. New uses should not alter the community perception of the oval being public open space.</i>	Not applicable.
<i>Policy 2.8</i>	<i>The ideal use of the site (excluding the main school building and headmaster's residence) is as a single institution, incorporating the Oval, given its historic associations and its role within the cultural framework of Parramatta. However, it is recognised that during the Heritage Council's tenure this is not possible and may be unlikely in the future.</i>	Refer to comments on Policy 2.2. The use of the site by a single institution, being the NSW Department of Education, reinstates this primary aspect of heritage significance.
<i>Policy 2.9</i>	<i>New development should not occur within areas identified as being of 'Very High' and 'High' significance.</i>	The subject site is the location of an existing playground area that was constructed as part of the newly opened O'Connell Street Public School. The playground area is included as part of the general setting identified as having <i>High significance</i> . The shade structures are completely reversible and will have minimal effect on the setting that is identified as being of <i>High significance</i> for its contribution to creating a park like setting.
<i>Policy 2.10</i>	<i>Development of the site should be restricted to those areas permitted by both the Conservation Plan and REP.</i> <i>The policies in the Addendum recommend some height limits that are lower than those in the REP.</i>	Not applicable.
<i>Policy 2.11</i>	<i>Any above ground car parking should be located and designed to avoid adverse visual impacts on the character of the site and adjacent streetscapes.</i>	Not applicable.

7.3.3 Development Potential - Sites for Development

The GML Addendum to the Conservation Management Plan contains a diagrammatic plan and section that explains the intent of the policies related to development potential, including the subject site. Dashed red lines extend from the northern end of Building D and the southern end of the east-west wing indicating a site for potential development. The diagrammatic plan is included below.

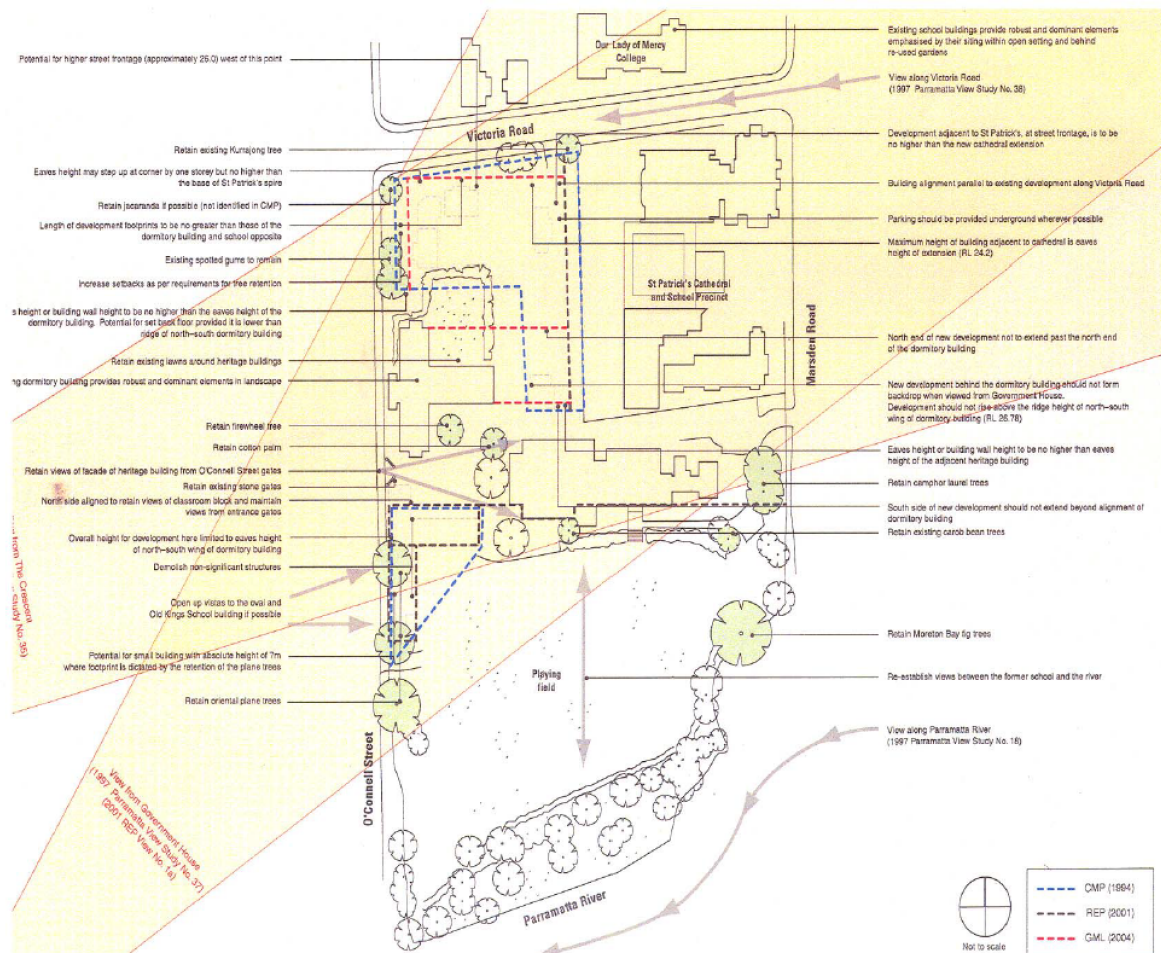


Figure 30 : Policy Diagram Plan

Source: Godden Mackay Logan, Former Kings School Conservation Plan – Policy Addendum, p.26.

Policy No.	Policy	Comment
<i>Development to Rear (east) of the Dormitory Building</i>		
<i>Policy 3.2.4</i>	<i>A new building is possible to the east of the Dormitory Building provided that it is located within the REP footprint envelope.</i>	The proposed shade structures are located to the north east of the Dormitory Building and are generally located within the REP footprint envelope.
<i>Policy 3.2.5</i>	<i>The south side of a building located at the south end of the north–south orientated leg of the development parcel should not extend past the south side of the rear east–west wing of the dormitory building.</i>	Not applicable.
<i>Policy 3.2.6</i>	<i>The north side of this building should be determined by considering its distance from</i>	Not applicable.

Policy No.	Policy	Comment
	<i>adjacent buildings to the north. As a general rule the separation between new buildings should be approximately equal to their eaves height.</i>	
<i>Policy 3.2.7</i>	<i>In general, new development to the east of the dormitory building should not form a backdrop when viewed from the grounds or the first floor level of Old Government House. To achieve this, development should not be higher than the ridge height of the north-south wing of the dormitory building (RL 26.78).</i>	The height of the proposed shade structures is considerably lower than the ridge height of the north-south wing of the former dormitory building, and they should not be visible when viewed from the grounds or first level of Old Government House.
<i>Policy 3.2.8</i>	<i>The eaves height of any new building at this location should be no higher than the eaves height of the kitchen annexe (Building I) located to the south (RL 21.42).</i>	<i>Not applicable.</i>
<i>Policy 3.2.9</i>	<i>There is the potential for an attic roof structure or recessed room/structure above this eaves line provided that it is located within a line taken at 30 degrees from the edge of the eaves (including any projecting eaves), from all directions. Deep projecting eaves are appropriate.</i>	<i>Not applicable.</i>
Development Character		
<i>Policy 3.4.1</i>	<i>The design of any new development should be harmonious with the existing significant fabric of the place and its surroundings, in terms of criteria or qualities of relatedness such as:</i> <i>1. height</i> <i>2. proportions</i> <i>3. rhythm and solids to voids/projections</i> <i>4. materials</i> <i>5. textures</i> <i>6. colour</i> <i>7. articulation by architectural details forms</i>	The proposed shade structures have been designed as simple, secondary elements that will have minimum impact on their historic counterparts. The height of the proposed shade structures is much lower than Building D. The proportions, form, materials, textures, colour and scale of the new structures are considered appropriate. The proposed shade structures have been designed to be distinctly contemporary and fully reversible, respecting the significance of the place.
<i>Policy 3.4.2</i>	<i>The success of new development will lie in its detailing. This should reflect the character of the existing heritage buildings, such as the robust character of their construction, modulation in plan, projecting eaves and shadow lines.</i>	The proposed shade structures have been designed as simple, contemporary secondary elements, clearly distinguished from the existing heritage buildings. The proposed shade structures are fully reversible.
Significant Views		
<i>Policy 3.5.1</i>	<i>Significant views over the site, which were identified in the 1997 Parramatta Regional Environmental Plan (REP), include the following:</i> <i>• views along Victoria Road to the east towards the spire of St Patrick's Cathedral, or to the west towards O'Connell Street (View No. 18);</i> <i>• views along Parramatta River to the east and west, in particular the view of the historic school buildings fronting the oval (View No. 38);</i> <i>• views to the north and south along O'Connell Street, with glimpses of the cathedral spire possible between existing</i>	The proposed shade structures will have minimal visual impact. Views along Victoria Road are not affected by the proposed shade structures. Views from Parramatta River east towards the historic school building's fronting the oval are not affected by the proposed shade structures. The proposed shade structures are obscured by a combination of tree's

Policy No.	Policy	Comment
	<i>built and landscape elements, and views of the former classroom block possible from the stone entrance gates (View No. 48);</i> <i>distant views from The Crescent, Parramatta Park (View No. 35); and distant views from the grounds of Old Government House (View No. 37). This view has been developed during the preparation of the current report to include the view achieved from the first floor level, being significantly enhanced from the view that is possible at ground level.</i>	and the mass of Building D (former dormitory building) from views towards the site from O'Connell Street. The proposed shade structures are of a scale that will be obscured by the mass of Building D (former dormitory building) when viewed from Parramatta Park and from the grounds of Old Government House.
<i>Policy 3.5.2</i>	<i>New development should be limited in height to ensure that it is not seen above the roof of the dormitory building in views from Parramatta Park and the upper level of Old Government House.</i>	The proposed shade structures are obscured by the adjacent Building D (former dormitory building) and will not be seen above the roof of the dormitory building in views from Parramatta Park and the upper level of Old Government House.
<i>Policy 3.5.3</i>	<i>Consideration of the impact of new development on the views of the site from Old Government House, Parramatta Park and The Crescent should be exclusive of the existing trees.</i>	Refer above.
7.3.4 Site Management		
<i>Policy 4.1</i>	<i>Regardless of the future use and ownership of individual allotments, the care and management of the entire former King's School site should be cohesive. The future management structure should be formulated to facilitate this need.</i>	The site is under the care and management of a single ownership (ie: the O'Connell Street Public School) which ensures that the care and management of the site remains cohesive. The Department of Education (DoE) is responsible for facilitating this need.
<i>Policy 4.2</i>	<i>Any approval or subdivision of the site, which would separate the Main School Building from the oval and/or river should be conditional upon restrictions being placed on the allotment titles preventing:</i> <i>fences or other physical elements marking the boundary between the two properties (with the exception of the existing fire gates or fences reconstructed on the basis of good evidence as part of the interpretation of the cultural landscape);</i> <i>planting between the main building group and the oval (with the exception of the retention of the existing privet hedge and low planting that would not obscure view); and</i> <i>permanent structures between the main buildings group and the oval and river. This would not preclude temporary structures or facilities associated with the operation of the oval or the use of the river (such as a marquis, temporary seating etc) provided that their location maintains the spatial relationship between the main building group and the river.</i>	Not relevant to this scope of works.

Policy No.	Policy	Comment
	<i>A boatshed or other facilities that have a historical precedent on the river foreshore may be acceptable provided that their location does not adversely affect the spatial relationship between the main building group and the river.</i>	
<i>Policy 4.3</i>	<i>Any proposals for new or replacement fencing should remain subject to Heritage Council approval.</i>	Not relevant to this scope of works.
<i>Policy 4.4</i>	<i>Upon the introduction of any new management regime, or subsequent change of ownership, the restrictions placed on the title should be reviewed by an appropriate heritage specialist, and updated as required.</i>	Refer to comments for Policy 4.1.
<i>Policy 4.5</i>	<i>Any subdivision boundaries should be located so as to:</i> <i>Facilitate sensitive, realistic and practical options for interpretation of the cultural landscape, especially restoration of planted elements and reintroduction of known cultural landscape forms from previous periods of post-European settlement;</i> <i>Respect the topographical and structural (built and vegetated) components of the landscape, including those beyond the site boundaries especially along both banks of the early 19th century Parramatta River Weir (rebuilt later);</i> <i>Allow for the progressive landscape development of new works compatible with the conservation of the overall cultural landscape; and</i> <i>Include the full extent of the former Headmaster's garden within the same lot as the former Headmaster's house.</i>	Not relevant to this scope of works.
<i>7.3.5 Continuity of Advice</i>		
<i>Policy 5.1</i>	<i>Persons with relevant expertise and experience in conservation projects should be engaged for the consistent interpretation of the plan and the resolution of conservation issues as well as for the design and supervision of work on the place.</i>	Tonkin Zulaikha Greer Heritage have been engaged as heritage consultants for resolution and advice on the design and on any conservation issues that arise during installation of the shade structures.
<i>7.3.6 Review of Policy</i>		Not relevant to this scope of works.
<i>7.3.7 Maintenance and Repair</i>		Not relevant to this scope of works.
<i>7.3.8 Retention of Original and Early Fabric Spaces</i>		Not relevant to this scope of works.
<i>7.3.9 Use of Documentary and Physical Evidence</i>		Not relevant to this scope of works.
<i>7.3.10 Roofs and Rainwater Disposal System</i>		Not relevant to this scope of works.
<i>7.3.11 Exterior Masonry</i>		Not relevant to this scope of works.
<i>7.3.12 Openings</i>		Not relevant to this scope of works.
<i>7.3.13 Painting</i>		Not relevant to this scope of works.
<i>7.3.14 Integration of Services</i>		Not relevant to this scope of works.

Policy No.	Policy	Comment
7.3.15 Fire, Stairs and Lifts		Not relevant to this scope of works.
7.3.16 Lighting		Not relevant to this scope of works.
7.3.17 Acoustic Separation and Fire Resistance/Separation		Not relevant to this scope of works.
7.3.18 Setting		
Policy 18.1.1	Maintain the vital spatial relationship between the building group and the river, uninterrupted by other development (as existing in the 1994 Conservation Plan). There should be no physical or visual separation between the main building group (Main School Building and Headmaster's Residence and the Oval and Parramatta River to the south, ie no permanent structures, fencing or plantings. Temporary, ephemeral elements may be acceptable (such as marquees for fairs etc).	Not relevant to this scope of works.
Policy 18.1.2	Maintain the visual dominance of the main building group overlooking the open space and Parramatta River to the south.	Not relevant to this scope of works.
Policy 18.1.3	Maintain and conserve the existing privet hedge and carob bean tree located to the south of the Main School Building and the dining hall.	Not relevant to this scope of works.
Policy 18.1.4	The landscape treatment of the oval, including any items such as paving, should retain the character of the oval and not obscure interpretation of its use as a sporting field of its association with the former King's School.	Not relevant to this scope of works.
Policy 18.2	Within the general context of the proposed rehabilitation of the whole of the upper Parramatta River, the new landscape works to the riverbank in front of the Marsden Hospital site should be designed, constructed and maintained to: - Reflect the history of the cultural landscape of the former King's School during the 19th and early 20th century, based on archival evidence, and - Re-establish the Picturesque setting of the Main Building with views to and from the river.	Not relevant to this scope of works.
Policy 18.3	Maintain views to the site from O'Connell and Marsden Streets to the main building group and the dormitory block from both northern and southern directions, uninterrupted by other development.	Views to the site from both O'Connell Street and Marsden Street to the main building group and former dormitory are maintained. The shade structures are located behind the dormitory block and their visual impact is minimised by mature trees and surrounding development. The shade structures will be fully reversible and distinctly contemporary in design.
Policy 18.4	Retain the trees rated as "R" in Appendix A of the Landscape Report (Appendix 3) and section 6.5 of this document	No trees rated 'R' are affected by the proposal.

Policy No.	Policy	Comment
<i>Existing Landscape Elements</i>		
<i>Policy 18.5.1</i>	<i>Establish and implement a program of tree surgery for the significant trees requiring attention, as outlined in the arborist's report, Appendix B of the Landscape Report (Appendix 3 of the Conservation Plan 1994).</i>	Not relevant to this scope of works.
<i>Policy 18.5.2</i>	<i>Existing significant trees in poor condition, such as the Carob Bean trees to the south-east and south-west of the Main Building should receive urgent conservation treatment by a qualified arborist, including pruning, watering, soil aeration and feeding. All such trees at the end of their natural life should be replanted in similar locations, preferably using healthy cuttings or seedlings grown from the same trees.</i>	Not relevant to this scope of works.
<i>Policy 18.5.3</i>	<i>Evidence of previous elements (such as formation of old driveways, depressions indicating sites of former trees) should be retained for interpretation, and suitable planting re-established in old locations.</i>	Not relevant to this scope of works.
<i>Policy 18.5.4</i>	<i>Selective clearing under supervision of an experienced heritage landscape consultant should be carried out to reveal and preserve early plantings, especially along the old c1850s curved stone retaining wall leading to the weir. This should be done before determining the position of any new features (such as the proposed cycle way), so as to inform the decision on where such new features are located.</i>	Not relevant to this scope of works.
<i>Car Parking</i>		
<i>Policy 18.6</i>	<i>On ground car parking areas and internal access roads should be designed so that they are unobtrusive and do not detract from the visual character and significance of the buildings and their settings.</i>	Not relevant to this scope of works.
<i>New Landscape Elements</i>		
<i>Policy 18.7</i>	<i>The design of the new and soft landscape elements (tennis courts, terraces, pathways, fences, etc) should harmonise with the buildings and setting in ways which retain and enhance the aesthetic significance of the place.</i>	The proposed shade structures will be distinctly contemporary elements, which will not compromise the aesthetic significance of the place. The proposed shade structures will be fully reversible.
<i>Policies/Guidelines for Walking Track / Cycle Way Along Northern Track</i>		Not relevant to this scope of works.
<i>Policies for Structures on the Northern Bank</i>		Not relevant to this scope of works.
<i>Specific conservation options for items of significance, beyond general policies above. Policies 7.3.19 – 7.3.30</i>		Not relevant to this scope of works.
<i>7.3.31 Heritage Listing</i>		Not relevant to this scope of works.
<i>7.3.32 Archaeological Management</i>		
<i>Policy 32.1</i>	<i>The sites identified as Zone 1 of the Archaeological Zoning Plan, Figure 4, should be excavated by an archaeologist before any development takes place.</i>	A report entitled Statement of Heritage Impact for Historical Archaeology was prepared by AHMS (now EXTENT) in 2016 to accompany the SSDA.

Policy No.	Policy	Comment
		The AHMS report identified the site as having 'low' historical archaeological potential. This application is accompanied by a letter from Extent which concludes that the impact of the proposal on the archaeological resource will be minimal.
<i>Policy 32.2</i>	<i>For the sites identified as Zone 2 of the Archaeological Zoning Plan, Figure 4, any removal of deposit under the ground floor or beside the main building should be accompanied by archaeological monitoring, in case archaeological features are found.</i>	Not relevant to this scope of works.
<i>Policy 32.3</i>	<i>For the sites described as Zone 3 of the Archaeological Zoning Plan, Figure 4, an archaeologist should be on call during development and should monitor the work if archaeological sites are found.</i>	Refer to comments for Policy 32.1.
7.3.33 Interim Controls		
<i>Policy 33.1</i>	<i>Until the control mechanisms outlined in 8.0 Policy Implementation below are operative, the advice of the Heritage Council of NSW should be sought for proposed work to items of 'very high', 'high' and 'moderate' significance.</i>	The suggested control mechanisms are operative.

7.3 HERITAGE IMPACT SUMMARY

The adaptive re-use of the former Old Kings School site as the O'Connell Street Public School has enabled the heritage significance of the place to be retained and enhanced. The proposed new shade structures are required to provide sun protection for children in the playground adjacent to Building D.

The proposed shade structures are located in an area of low archaeological potential in terms of both Indigenous and Non Indigenous archaeology. This application is accompanied by a Historical Archaeological Impact Statement prepared by Extent which concludes:

The proposed location of the shade sails is in an area previously assessed as having low-nil archaeological potential and no known significance (Extent 2017). Recent archaeological investigations and site works provide no evidence to revise this assessment. No previous buildings are assessed as being in the area immediately north of Building D, nor the existence of the PTSS.

Installation works can proceed with no requirement for additional archaeological mitigation measures.

The shade structures have been designed as contemporary secondary elements, to ensure that there is a clear distinction between the old and the new. The visual impact of the structures has been minimised by siting them behind the bulk of Building D and by minimising their height. The shade structures are fully reversible.

The proposed shade structures to the playground adjacent to Building D will have minimal impact on the heritage significance of the former Old Kings School and are recommended for approval.

8.0 RECOMMENDATIONS

The proposed scope of works is intended to involve minimal, if any, impacts on the heritage significance of the area adjacent to Building D (former dormitory building).

The following recommendations are suggested to ensure that any potential heritage impacts are minimised or mitigated:

- Undertake all works in accordance with the principles of the *ICOMOS Burra Charter* and the policies contained in the 1994 *Marsden Rehabilitation Centre (Former King's School) Parramatta Conservation Management Plan and Appendix*.
- Follow the recommendations of the *O'Connell Street Parramatta: Primary School, Aboriginal Cultural Heritage Desktop Assessment*, prepared by Umwelt in January 2017 in order to avoid any adverse impact on this potential resource.
- Follow the recommendations of the *Old Kings School, Parramatta, Statement of Heritage Impact: Historical Archaeology*, prepared by AHMS April 2016 in order to avoid any adverse impact on this potential resource.
- Minimise ground disturbance.
- It is unlikely that mitigation measures would be required during installation, but a stop-work procedure should be implemented in the case of unexpected finds. If fabric is uncovered that may potentially have heritage significance (previously unknown), stop work in the area immediately, inform the project team and seek guidance on how to proceed.
- Integrate any new services in the most discrete way possible, resulting in minimal disturbance to the potential archaeological resource, with minimal visual impact.
- New works to be completely reversible.
- Protect all significant elements in the vicinity of the site during the works including built and landscape elements.
- Undertake necessary cleaning at the conclusion of the works.

10.0 REFERENCES

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