

## HERITAGE AND HISTORICAL ARCHAEOLOGICAL REPORT

**Budawang SSP, 17 Croobyar Road,  
Milton, NSW**

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## Executive Summary

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The proponent, Schools Infrastructure NSW is preparing a development application for the development of new premises for the relocation of the Budawang school from Ulladulla to Milton. The new school will be located on the site of the former Anglican School at Croobyar Road in Milton, NSW. The proposed development is considered State Significant Development and the application is being prepared in accordance with the Planning Secretaries Environmental Requirements, SD-8845345. The environmental assessment requirements include the completion of a heritage assessment of the study area. This document describes the heritage assessment and associated recommendations.

The archaeological survey and historical research undertaken for the study area has determined that there are no items or features of historical significance within Lot 200 and DP1192140, and there is very low potential for historical archaeological deposits within the proposed development footprint. The location is considered to have low archaeological sensitivity.

An assessment of the impacts of the development on the nearby local heritage items, the Victorian Rendered Masonry Store (Heritage Bakery) and Church of England Cemetery has concluded that the impacts from the proposed development will be minor and will not diminish the heritage values of either of the items, nor will it diminish the community appreciation of these items.

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## 1 Introduction

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### 1.1 Background and Scope

Tocomwall Pty Ltd have been engaged by Schools Infrastructure NSW (SINSW) to provide an assessment of the archaeological potential and significance on the site and the impacts the development may have on this significance; an assessment of the impact on the heritage significance of the heritage items on and adjacent to the site in accordance with the guidelines in the NSW Heritage Manual (Heritage Office and DUAP, 1996); and Assessing Heritage Significance (OEH, 2015) of the existing structures on Lot 200 and DP1192140. This report is broken into three sections addressing each of the aspects of the assessment.

### 1.2 Investigation Contributors

This report is prepared by William Moon MA Archaeology and Heritage Management, Flinders University, GCPJM and Dip PJM University of New England. William has 12 years experience in the heritage industry, with 5 years experience as an archaeologist. The investigation was undertaken by William Moon and Danielle Mitchell. Danielle has a Bachelor of Science from Macquarie University, majoring in Geology, Palaeobiology, Ancient Mediterranean Cultures. Graduate Diploma in Archaeology and Heritage Management from Flinders University, Adelaide, SA. She has 16 years experience working as an archaeologist. Architectural advice was provided by Architect Richard Nugent.

### 1.3 Research Objectives

The research objectives for the study area include:

- Through desktop research and site inspection gather information that is useful for furthering our understanding of the history of use of the study area, including past development, past land use, and potential for buried archaeological deposit.
- Determine whether archaeological deposits and features associated with the former use of the study area could inform a future more detailed cultural heritage assessment, should they be justified.
- Assess the degree of modification of the landscape to determine if any intact soil profiles are likely to be present or whether past land use activities have caused the pre-existing soil horizons to have been removed or disturbed.
- Determine whether there is a need for a Historical Archaeological Assessment and Research Design (HAARD).
- Determine the potential impacts of the new development on adjacent Shoalhaven LEP listed local heritage items.

## 1.4 Research Questions

The research questions include:

- What evidence exists for all periods of site use that contributes to our understanding of the historical use and development of the study area?
- Are there likely to be any buried archaeological features or deposits present in the study area?
- Does sufficient archaeological evidence potentially survive to answer more detailed research questions about how the study area was used in the past?

## 1.5 Applicable Legislation and Guidelines

The New South Wales Heritage Act 1977 (as amended) affords automatic statutory protection for all 'relics' that form archaeological deposits or part thereof.

This Act defines a 'relic' as:

any deposit, object or material evidence relating to the settlement of the area that comprises NSW, not being an Aboriginal settlement, and which is 50 or more years old.

The Heritage Act 1977 contains provisions relating to the protection of items of heritage significance or items of potential significance. Section 139 of the Act requires that a person must not disturb or excavate any land knowing or having reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed unless the disturbance or excavation is carried out in accordance with an excavation permit.

Further applicable guidelines:

Guidelines for the preparation of Archaeological Management Plans, Heritage Branch Department of Planning 2009.

The State Heritage Register pursuant to the NSW Heritage Act 1977.

Assessing Heritage Significance. New South Wales Heritage Manual 2. NSW Heritage Office 2001.

## 2 Description of the Study Area

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### 2.1 Location and Proposed Development

The proposed development of the Budawang SSP is located at Lot 200 in D.P. 1192140, Number 17 Croobyar Road Milton. It is the site of the former Anglican school at Croobyar Road in Milton, NSW. The site has been used for educational purposes since at least the early 1990s when the Croobyar Christian School opened. After the closure of the Croobyar School

the site was acquired by the Shoalhaven Anglican School, who further expanded the facilities, with the most recent buildings on site being constructed as recently as 2015 (Group GSA 2020). Figure 1 to Figure 4 show the layout of the existing buildings within the study area, buildable areas within the site, and the location and proposed arrangement for the Budawang SSP.



**Figure 1: Layout of existing buildings within the study area (Group GSA 2020).**



Figure 2: Locations considered as buildable areas within the study area (Group GSA 2020).



**Figure 3: Budawang SSP site location (Group GSA 2020).**

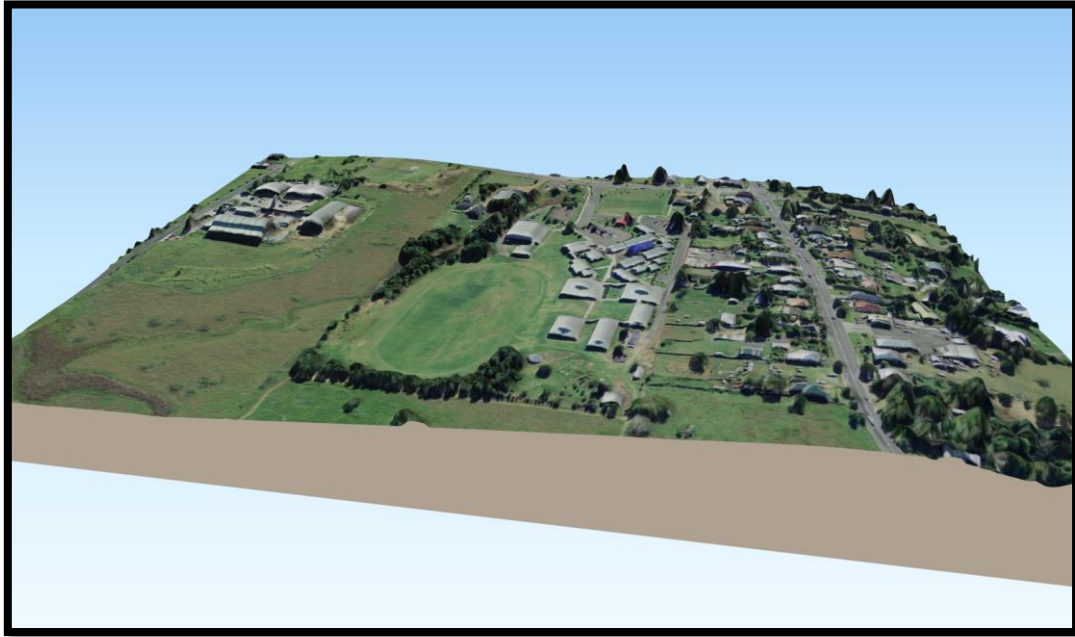




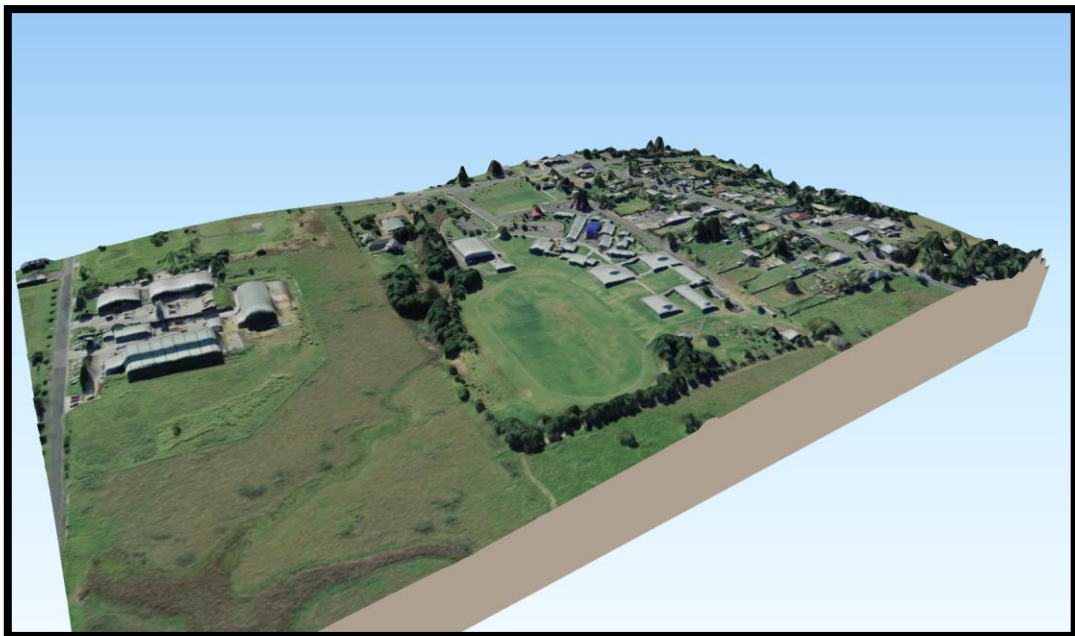
Figure 4: Masterplan option showing the locations of new buildings (Group GSA 2020).

## 2.2 Site Description

The study area is located on the side of a low ridge, gently sloping to the west towards a small first order stream that drains into Pettys Creek. The ridgeline runs east to the coast at Mollymook/Ulladulla, and west to the ranges between Croobyar Creek to the north, and Stoney Creek to the south. Lot 200 fronts onto Croobyar Road, and is located behind a cluster of residential lots, and a commercial lot that are east of Lot 200. Figure 5 and Figure 6 show two perspectives using a 3D model derived from LiDAR to illustrate the terrain conditions across the study area.



**Figure 5: A 3D image looking north over the study area. LiDAR and basemap image © Department Finance, Services and Innovation.**



**Figure 6: 3D model looking northeast over the study area 3D model of the study area derived from an aerial image overlaying a LiDAR derived DEM showing the terrain of the study area. LiDAR and basemap image © Department Finance, Services and Innovation.**



The study area is within the lands of the Yuin people. The Yuin were displaced from their lands by the European colonisation of the South Coast.

### 3 Archaeological Potential

#### 3.1 History of the Study Area

The study area was first purchased as a Crown Land Grant by John Fisher Cambage on the 1<sup>st</sup> of June 1853. J F Cambage purchased both Portions 120 and 121. The original Crown Grants to J. F. Cambage are shown in Figure 7 and Figure 8 (Hazlett 2020).

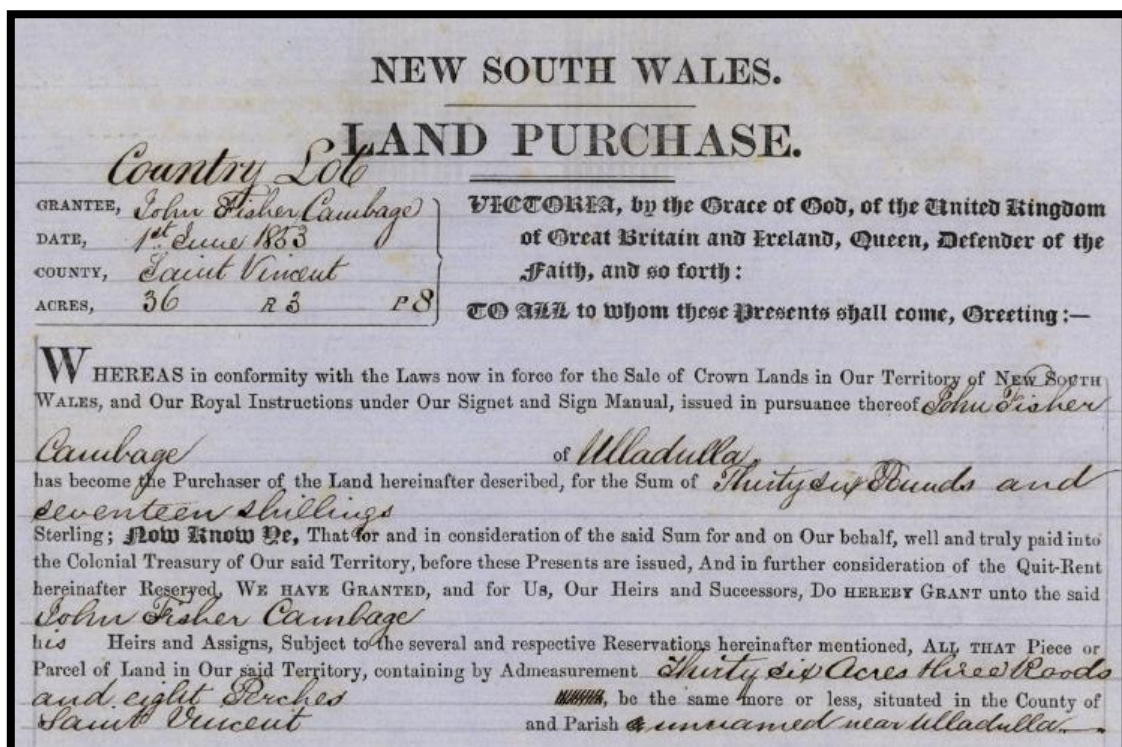


Figure 7: Crown Grant Purchase J F Cambage (Hazlett 2020).

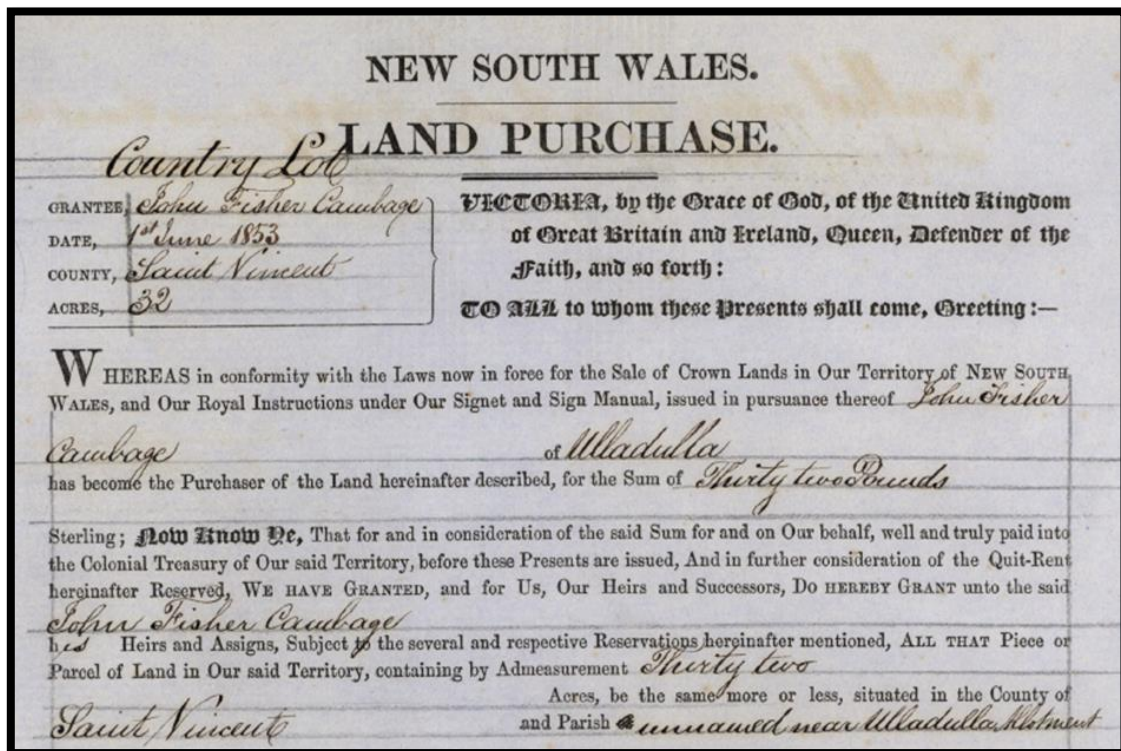


Figure 8: Crown Grant Purchase J F Cambage (Hazlett 2020).

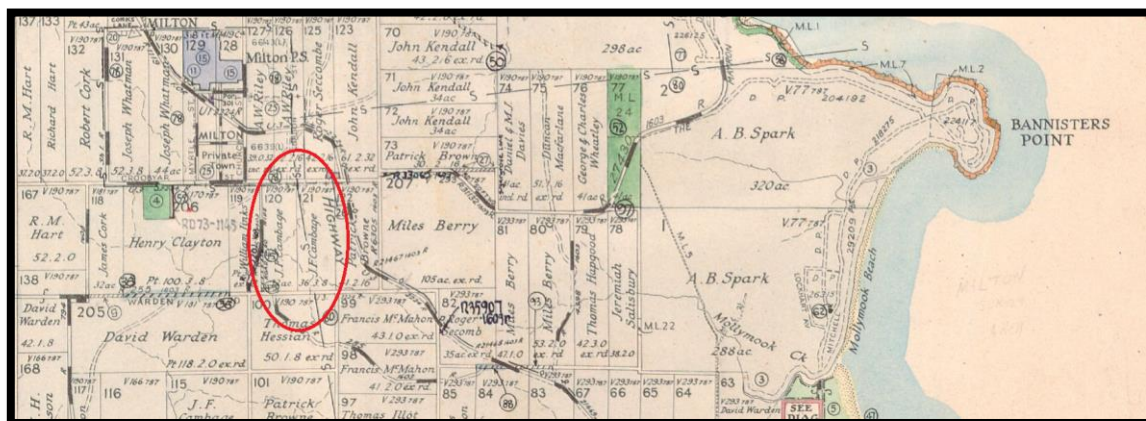


Figure 9: Parish map showing Portions 120 and 121 procured as Crown Grants by J. F. Cambage. County of St Vincent, Parish of Ulladulla Sheet 1. Source NSW LRS.

J. F. Cambage who was a farmer (NSW Government Gazette 1897) who had a cottage built at nearby Wilfords Lane in 1868 by master builder James Poole. This cottage was named Applegarth and included a dairy farm complex including garden and cheese press. The cottage is still standing and both the cottage and farm are listed in the NSW State Heritage Inventory as locally significant heritage (NSW State Heritage Inventory). Cambage did not live on Portion 121 (the study area) and there is no record of any structures having been constructed on Portion 121. J. F. Cambage died in December 1896 (NSW Government Gazette 1897). In 1950 there was a Deed of Conveyance for the Portions 120 and 121, now

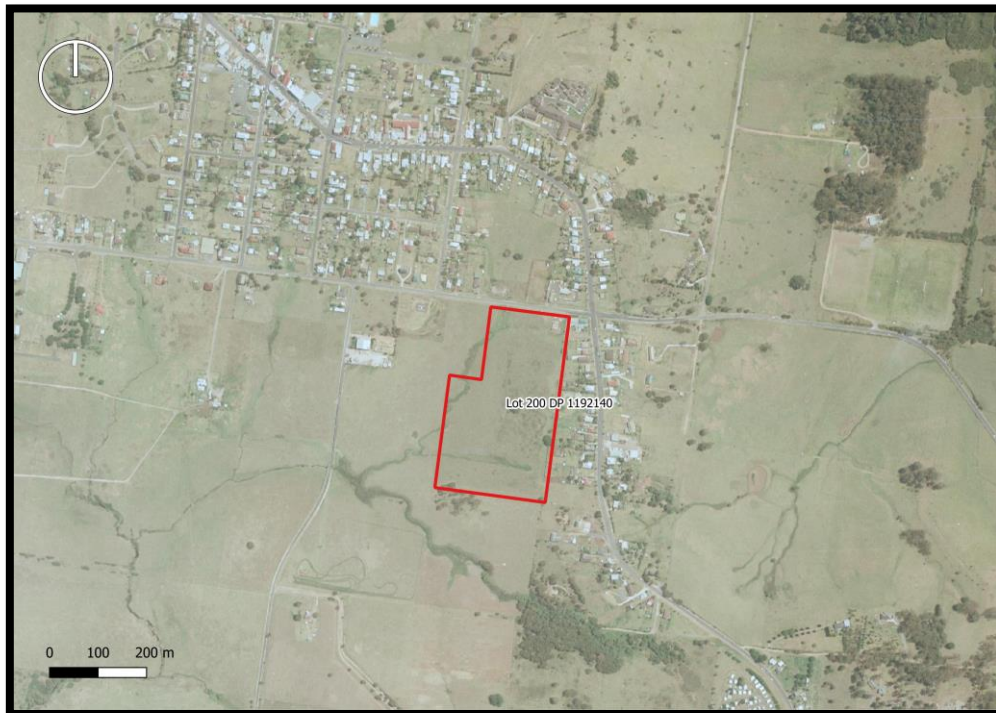


called lots 1 and 3 DP811690 to Gordon and Henry Porter. In 1971 there was a Grant of Probate of the land to Henry John Porter and Katherine Lawrence Rickson. Following the death of Katherine Lawrence Rickson the title was certified to Henry John Porter in 1991 (Hazletts 2020). Electoral rolls from 1963 and 1968 indicates that Henry Porter was a farmer who resided on the Princess Highway at Milton. Henry John Porter was a dairy farmer who resided at Hilltop, Milton (Ancestry.com 2010, Australian Electoral Commission Rolls).

Aerial imagery of the study area from 1959 shows that the land was clear of vegetation and there are no buildings or other structures (refer to Figure 10). A 1991 aerial image (refer Figure 11) of the study area shows the first building on the site at the location of the present pre-school building. The most likely use for the study area was for grazing and growing pasture. As part of this assessment, no historical records were identified that indicate any historical structures or buildings had been built on Lot 200 DP1192140 (Portion 121).



**Figure 10: Aerial image from 1959. Source © Spatial Services NSW Government.**



**Figure 11: Aerial image of the study area from 1991. Source © Spatial Services NSW Government.**

### **3.1.1 Heritage Searches**

A search of the NSW State Heritage Register, Australian Heritage Database and the Shoalhaven Shire LEP 2014 has revealed that there are no heritage items listed within the study area.

### **3.1.2 Site Survey**

The archaeological survey was carried out on the 27th of October 2020 by Tocomwall archaeologists Will Moon. There were no historical items or areas identified with potential archaeological deposit during the survey.

### **3.1.3 Archaeological Sensitivity and Significance**

The research into the history of the study area together with the archaeological survey has determined that the study area within the development footprint is unlikely to include archaeological features and deposits. There are no identified records that suggest archaeological features or deposits would be present or retained within the study area. The study area has also been subjected to significance soil disturbance resulting from the construction of the former Anglican College.

### **3.1.4 Archaeological Recommendations**

The study area within the development footprint is considered to have low to nil potential to retain archaeological features and deposits. No further investigation is considered necessary.

## 4 Cultural Heritage Significance of Existing Structures

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Due to the young age of the former Anglican College, the existing buildings are not historically significant so the NSW heritage assessment criteria from Assessing Heritage Significance (NSW Heritage Office 2001) for this assessment, whilst considering all criteria, it is mainly concerned with criteria C and F. The assessment has been made to ascertain if the subject school can be considered to be of a high aesthetic characteristics or a high degree of creative or technical achievement i.e. design excellence merit. This refers to Criterion (c) in the NSW Guide. A second aspect of this assessment is Criterion (f) which seeks to determine if an item possesses an uncommon, rare or endangered aspect of NSW's cultural or natural history.

Assessment of design excellence is not an exact science therefore it is helpful to set some parameters for making the assessment. It is also important to keep in mind that 'good design' may not necessarily achieve design excellence. For an item to achieve design excellence it would need to demonstrate unique outcomes that set it apart from other items.

Criteria considered in this assessment:

Contextual Response – How the item relates to its surroundings. An exceptional outcome would be one that challenges norms of site planning and provides new ways of relating the school to the surrounding landscape or built form.

Planning and Layout – The layout of the item itself and functional relationship between elements. An exceptional outcome would be one where the school provides a unique response to function and suggests new paradigms in learning environments.

Architectural Tectonics – The architectural construction of the item and the resolution of its detailing and materiality. An exceptional response would be one where the school design demonstrates innovative use of material, structure and detailing that pushes the boundaries of established expectations at the time of construction.

Cultural Uniqueness – The item would need to represent a unique cultural attribute for NSW. This would mean that significant social meaning would need to be attached to the item that sets it apart.

### 4.1 Limitations

At the time of this assessment an incomplete set of design drawings and as built drawings were available for the review. The assessment is based upon the site inspection and the photographic record obtained during the school site inspection.

## 4.2 Description

The former Anglican College and site of the Budawang SSP is located at 17 Croobyar Road, Milton, NSW. The Budawang School is being relocated to the site of the former Shoalhaven Anglican School in Milton. This 7.6 ha site is located in a low rise residential area primarily comprised of single family dwellings and has been occupied for educational uses since the 1991. The school site slopes generally from the east towards the west where the oval is located. Various organisations have been involved in the design and development of the college since the initial construction of the Croobyar Christian School around 1990/1 including Veitch and Reiman (pers comm. Shoalhaven City Council Governance), Noel Bell Wridley Smith and Partners, Rossmark, and Milton Drafting and Design.

### 4.2.1 Physical Evidence

The school takes the form of a series of single storey brick pavilions along the ridge of the site. The school is located on a 7.6 ha site in a low rise residential area, primarily comprised of single family dwellings and has been occupied for educational uses since 1991.

### 4.2.2 Setting

The school site is located along the edge of a low density residential area to the north and east with the oval interfacing with rural landscape and light industrial lands to the south and west.

## 4.3 Cultural Heritage Assessment

The cultural heritage assessment is based upon the requirements defined in the guidelines and methods defined by the NSW Heritage Office. It includes a set of criteria required to be used for all assessments of cultural significance within the state. These criteria are set out in the following sections and include comments on the assessment of the former Anglican College site and structures against the criteria. The purpose of the heritage assessment is to contribute towards decisions about whether to retain items, how changes will impact upon items, whether there is a need for conservation management, and whether an item should be listed on the state heritage register (NSW Heritage Office 2001).

## 4.4 Cultural Significance Assessment

The cultural significance of the place is determined by the research and sourcing of information about the place followed by the analysis of the information against the significance criteria in order to arrive at the conclusions and recommendations for the place. The Burra Charter defines cultural significance as *'the aesthetic, historic, scientific, social or spiritual value for past, present or future generations. Cultural significance is embodied in the place itself, its fabric, setting, use, associations, meanings, records, related places and related objects'* (Australia ICOMOS 2013:2).

### Criterion (a)

An item is important in the course, or pattern, of NSW's cultural or natural history (State significance); OR

An item is important in the course, or pattern, of the local area's cultural or natural history (local significance).

Guidelines for INCLUSION	Guidelines for EXCLUSION
<ul style="list-style-type: none"> <li>• shows evidence of a significant human activity</li> <li>• is associated with a significant activity or historical phase</li> <li>• maintains or shows the continuity of a historical process or activity</li> </ul>	<ul style="list-style-type: none"> <li>• has incidental or unsubstantiated connections with historically important activities or processes</li> <li>• provides evidence of activities or processes that are of dubious historical importance</li> <li>• has been so altered that it can no longer provide evidence of a particular association</li> </ul>

The former Anglican College has no known connections with historically important activities, phases or processes.

**Criterion (b):**

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

An item has strong or special association with the life or works of a person, or group of persons, of importance in the cultural or natural history of the local area (local significance).

Guidelines for INCLUSION	Guidelines for EXCLUSION
<ul style="list-style-type: none"> <li>• shows evidence of a significant human occupation</li> <li>• is associated with a significant event, person, or group of persons</li> </ul>	<ul style="list-style-type: none"> <li>• has incidental or unsubstantiated connections with historically important people or events</li> <li>• provides evidence of people or events that are of dubious historical importance</li> <li>• has been so altered that it can no longer provide evidence of a particular association</li> </ul>

The former Anglican College has no known connections with historically important people or events.

**Criterion (c):**

An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (State significance);

OR

An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the local area (local significance).

Guidelines for INCLUSION	Guidelines for EXCLUSION
<ul style="list-style-type: none"> <li>• shows or is associated with, creative or technical innovation or achievement</li> <li>• is the inspiration for a creative or technical innovation or achievement</li> <li>• is aesthetically distinctive</li> <li>• has landmark qualities</li> <li>• exemplifies a particular taste, style or technology</li> </ul>	<ul style="list-style-type: none"> <li>• is not a major work by an important designer or artist</li> <li>• has lost its design or technical integrity</li> <li>• its positive visual or sensory appeal or landmark and scenic qualities have been more than temporarily degraded</li> <li>• has only a loose association with a creative or technical achievement</li> </ul>

**Contextual Response** – The school site is located along the edge of a low density residential area to the north and east with the oval interfacing with rural landscape and light industrial lands to the south and west. An internal access road and some landscaping separate the school facilities from the residential area. The buildings are located along the eastern portion of the site adjacent to the residential boundary. This interface is generally good but lacks an adequate landscape buffer. A significant stand of vegetation is located along the western edge of the site, along with a dam, following a watercourse line that crosses into adjacent undeveloped land. The contextual response would be considered neutral.

**Planning and Layout** – The school is comprised of a series of pavilions oriented approximately north-south with a cluster of pavilions at the northeast corner of the site running northeast-southwest. The existing buildings form two interconnected central open spaces, with the exception of the gym building, which is located outside the main building cluster to the north of the oval. Pavilions M, N, O, P and Q form the heart of the campus and define a shaded outdoor gathering space. The overall layout is considered good.

**Architectural Tectonics** – The architecture of the pavilions is conventional and expected for the late 20th century. They feature brick and weatherboard finishes with conventional fenestration. Most of the pavilions contain a single loaded corridor giving most rooms the opportunity for natural cross ventilation. The tectonics are considered neutral.

#### **Criterion (d):**

An item has strong or special association with a particular community or cultural group in NSW for social, cultural or spiritual reasons (State significance); OR



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

Guidelines for INCLUSION	Guidelines for EXCLUSION
<ul style="list-style-type: none"> <li>is important for its associations with an identifiable group</li> <li>is important to a community's sense of place</li> </ul>	<ul style="list-style-type: none"> <li>is only important to the community for amenity reasons</li> <li>is retained only in preference to a proposed alternative</li> </ul>

There is no evidence that the former Anglican College has important associations with an identifiable group or is important for the communities sense of place.

**Criterion (e):**

An item has potential to yield information that will contribute to an understanding of NSW's cultural or natural history (State significance); OR

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

Guidelines for INCLUSION	Guidelines for EXCLUSION
<ul style="list-style-type: none"> <li>has the potential to yield new or further substantial scientific and/or archaeological information</li> <li>is an important benchmark or reference site or type</li> <li>provides evidence of past human cultures that is unavailable elsewhere</li> </ul>	<ul style="list-style-type: none"> <li>the knowledge gained would be irrelevant to research on science, human history or culture</li> <li>has little archaeological or research potential</li> <li>only contains information that is readily available from other resources or archaeological sites</li> </ul>

The former Anglican College is of a relatively young age and it is not considered to have attributes that would contribute to an understanding of NSW's cultural history.

**Criterion (f):**

An item possesses uncommon, rare or endangered aspects of NSW's cultural or natural history (State significance); OR

An item possesses uncommon, rare or endangered aspects of the area's cultural or natural history (local significance).

Guidelines for INCLUSION	Guidelines for EXCLUSION
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<ul style="list-style-type: none"> <li>• provides evidence of a defunct custom, way of life or process</li> <li>• demonstrates a process, custom or other human activity that is in danger of being lost</li> <li>• shows unusually accurate evidence of a significant human activity</li> <li>• is the only example of its type</li> <li>• demonstrates designs or techniques of exceptional interest</li> <li>• shows rare evidence of a significant human activity important to a community</li> </ul>	<ul style="list-style-type: none"> <li>• is not rare</li> <li>• is numerous but under threat</li> </ul>
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The former Anglican College is a conventional late-twentieth century design. It provides for a decentralised approach to learning and a reasonably well resolved overall layout. This outcome would be in line with contemporary expectations.

**Criterion (g):**

An item is important in demonstrating the principal characteristics of a class of NSW's

– cultural or natural places; or

– cultural or natural environments (State significance);

OR

An item is important in demonstrating the principal characteristics of a class of the area's

– cultural or natural places; or

– cultural or natural environments (local significance).

Guidelines for INCLUSION	Guidelines for EXCLUSION
<ul style="list-style-type: none"> <li>• is a fine example of its type</li> <li>• has the principal characteristics of an important class or group of items</li> <li>• has attributes typical of a particular way of life, philosophy, custom, significant process, design, technique or activity</li> <li>• is a significant variation to a class of items</li> <li>• is part of a group which collectively illustrates a representative type</li> <li>• is outstanding because of its setting, condition or size</li> </ul>	<ul style="list-style-type: none"> <li>• is a poor example of its type</li> <li>• does not include or has lost the range of characteristics of a type</li> <li>• does not represent well the characteristics that make up a significant variation of a type</li> </ul>

<ul style="list-style-type: none"> <li>• is outstanding because of its integrity or the esteem in which it is held</li> </ul>	
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The former Anglican College is not considered to represent characteristics that make up a significant variation of a type. It is in line with contemporary expectations.

#### 4.5 Statement of Heritage Significance

The school design is in accord with contemporary expectations. It is not considered exceptional. There are no known historical themes associated with the school that would contribute to its assessment of significance based upon historical or social values. The Former Anglican College is not considered to have heritage significance.

#### 4.6 Recommendations

The Former Anglican College is not considered to have heritage significance. There should be no heritage constraints associated with the development of the existing school buildings.

#### 4.7 Image portfolio of existing buildings



**Block A north side**



**Block A south and east sides**





**Block A southwest corner**



**Block A north side**



**Block B west and south side**



**Block B west and south side**





**Block B north and east sides**



**Block B north side**





**Block C north west corner**



**Block C west side**





**Block C south and east sides**



**Block C north west corner**



**Block D northeast corner**



**Block D east side**





**Block D west side**



**Block D northwest corner**





**Block E northwest corner**



**Block E north and west sides**



**Block E south and west sides**



**Block E northeast corner**





**Building I north and east sides**



**Building I north side**





**Building I west and south sides**



**Building I south and east sides**





**Pre-school east side**



**Pre-school north side**





**Building L east and north sides**



**Building L west side**



**Building M northeast end**



**Building M southeast side**





**Building M northeast end and northwest side**



**Building M northwest side**



**Buildings N and O northwest ends**



**Building P southeast side**





**Building Q southeast side**



**Buildings R, S, T northwest sides**



**Building U northeast side**



**Building V northeast side**





**Building W northeast end**



**Building X northwest side**

**Table 1: Images of building from the former Shoalhaven Anglican School.**

## 5 New Development Adjacent to Heritage Items

There are two local heritage sites registered within the Shoalhaven Local Environment Plan 2014 that are in close proximity to the study area. This includes items 264 and 296 on the Heritage Map - Sheet HER\_016C.

Item 264 is recorded as the Milton Church of England Cemetery. It's statement of significance records that the site is locally significant because it is of 'considerable social and historic interest to the local community (OEH 2020)'.

The site was used as a burial ground between 'c. 1864 through to 1904 with 174 recorded burials (OEH 2020). In the 1980's the Anglican Church sold the property and it is claimed that the new owner destroyed all evidence of the headstones. Due to community concerns a memorial was constructed at the site in 1996 in memory of the many early pioneers of the area that were buried at the site.



**Figure 12: Wide angle view looking north at the Milton, Church of England Cemetery site and the memorial built in 1996.**

Item 296 is recorded as a Two Storey Victorian Rendered Masonry Store. It's statement of significance records that the building is locally significant and is '*One of the oldest buildings in the region with considerable historical significance as a rare example of an early store. The early Victorian building has strong associations with the pioneer McArthur and Blackburn families. The building retains its essential character and commercial prominence in the streetscape and continues to demonstrate the early importance of Croobyar Road.*'





**Figure 13: Item 296, Two Storey Victorian Rendered Masonry Store at the corner of Croobyar Road and Princess Highway, Milton. The proposed development is behind the white fencing at the right of the screen.**

### 5.1 Statement of Heritage Impact upon adjacent Heritage Items

The Heritage NSW Statement of Heritage Impacts Guideline, section New Development Adjacent to a Heritage Item has been used as the basis for considering the heritage impacts to Shoalhaven LEP items 264 and 296.

### 5.2 Item 264 Milton Church of England Cemetery

The following questions are extracted from the Heritage NSW Statement of Heritage Impacts Guideline: New Development Adjacent to a Heritage Item.

#### 5.2.1 *How is the impact of the new development on the heritage significance of the item or area to be minimised?*

The design concept considers the form and materiality of the community and residential buildings within the Milton area and surrounding locality. By using materiality that is common to the area, the buildings will sit within the local context (refer to Figure 15). The design of the new buildings for the Budawang SSP are single level buildings which will help to reduce the visible impact when looking out from within the cemetery (refer to Figure 14). There are no visible impacts when looking into the cemetery.



**Figure 14: Model showing the perspective of the Budawang SSP as viewed from the graveyard (Source GroupGSA).**



**Figure 15: Model aerial perspective of the Budawang SSP sitting within the surrounding local context (Source GroupGSA).**

### 5.2.2 Why is the new development required to be adjacent to a heritage item?

The Budawang SSP development is utilising the existing school grounds of the former Anglican School. This is a strategic decision by the NSW Education Department to make use of the existing school buildings on the site to address community education needs whilst also using the available space within the property to develop the purpose built Budawang SSP to address a shortage of suitable.

The objectives of the development are to address the need for Special Purposes school accommodation in the Milton Ulladulla locality. The Budawang SSP concept design report prepared by Groups GSA (2020) describes this need as follows:

*'The existing Budawang School for Special Purposes is currently located on Camden Street in Ulladulla within buildings it has occupied since the 1980s. The entry criteria for students to Budawang SSP is an assessment of moderate to severe intellectual disability. Typically, this is coupled with other disabilities, conditions or requirements, such as a sensory condition, autism, behavioural and/or emotional disorders, and/or severe physical disabilities. It is notable that the percentage of special needs within the entire school population for the South Coast of NSW is currently approximately 6%, which is notably higher than the NSW average.'*

*'The Camden Street Budawang SSP site is leased by the NSW Department of Education, for the purpose of a Special Needs School, however the current lease expires in December 2021. Existing facilities provide 5 homebases, which the Principal of Budawang states is inadequate compared to the number of students currently on the waiting list for enrolment at the school. Additionally, as the school has already been expanded by placement of demountable classrooms on the site, core facilities are inadequate for the current size of the school and there is insufficient outdoor space for learning and play. The existing buildings, particularly the core facilities, are in poor condition and have been assessed as being not fit for purpose. As the site is leased and is now too small to offer the required provision, relocation of Budawang SSP is necessary.'*

### 5.2.3 How does the curtilage allowed around the heritage item contribute to the retention of its heritage significance?

The curtilage area shown in the Shoalhaven LEP includes the whole of Lot100 DP1033797. A house has been recently built on the lot, and a wooden fence partitions the cemetery and the memorial from the house and associated yards. The original curtilage of the site is unknown. Early maps of the locality and aerial imagery provide little information regarding the extent of the site. As the proposed development is on the opposite side of Croobyar Road and across the pedestrian footpath, the proposed development will not impact upon the curtilage of the site. The view south from behind the site will be over the new buildings associated with the proposed development. The present view (refer Figure 10) is across the sports field to the existing school buildings. The view does not form a visual link to a



significant topographic feature or feature associated with the history of the site. There is no evidence of a visual link that is important for the heritage curtilage of the site.

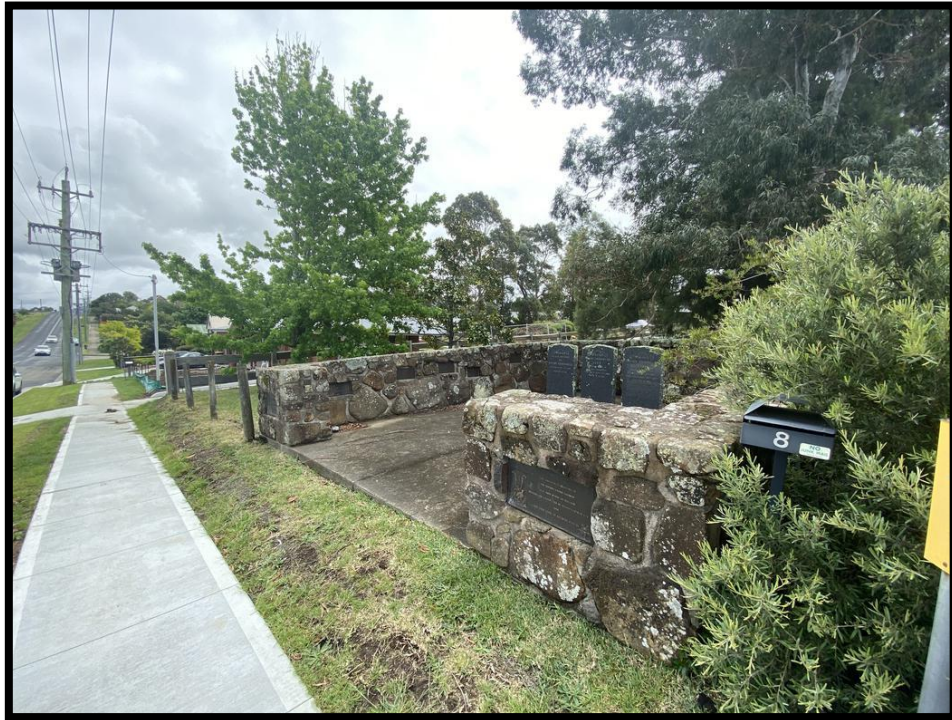
**5.2.4 *How does the new development affect views to, and from, the heritage item?  
What has been done to minimise negative effects?***

The proposed development will not impact views to the heritage site, including the memorial. Figure 16 and Figure 17 show views into the heritage site from the footpath. The site extents north behind the memorial and is comprised of a grassed area and some mature trees. No heritage objects were observed in this area.





**Figure 16: View north from the footpath to the memorial.**



**Figure 17: View looking west from the footpath to the memorial.**





**Figure 18: View looking east from the footpath to the Milton Church of England Cemetery and memorial.**

The view south from behind the memorial will be over the new buildings associated with the proposed development. The present view (refer Figure 19) is across the sports field to the existing school buildings. The view does not form a visual link to a significant topographic feature or feature associated with the history of the site. Whilst the Budawang SSP buildings and landscaping will be visible from the site, the design has been developed to be sympathetic to the surrounding context (Group GSA 2020:27). Refer to Figure 14. The significance of the heritage site is mostly intangible, there are no remaining grave sites or heritage objects visible on the site. The remaining tangible heritage item is the memorial which was erected after the destruction of heritage objects on the site. The proposed development is not expected to impact upon the intangible values and the memorial. Views from the site have already been impacted by the residential and commercial development around the site (refer to Figure 12). A model of the view from the graveyard has been produced to demonstrate the view from the graveyard into the school in Figure 14.



**Figure 19: View south from Milton Church of England Cemetery**

**5.2.5 *Is the development sited on any known, or potentially significant archaeological deposits? If so, have alternative sites been considered? Why were they rejected?***

The proposed development is not sited on any known or potentially significant archaeological deposit.

**5.2.6 *Is the new development sympathetic to the heritage item? In what way (e.g. form, siting, proportions, design)?***

The proposed development has been designed to be sympathetic to the surrounding context. The Master Plan describes this as ‘Conceptually the design uses materiality and

*forms common to the Shoalhaven locality to give the building a slightly domestic scale and appearance, and thus feel more comfortable and familiar to the students, whilst blending in with the surroundings (Group GSA 2020).'*

### **5.2.7 Will the additions visually dominate the heritage item? How has this been minimised?**

The sympathetic design of the proposed development will not dominate the heritage item. The item is viewed from the footpath or by entering the site. The proposed development does not impact upon the ability to view and appreciate the site and its significance.

### **5.2.8 Will the public, and users of the item, still be able to view and appreciate its significance?**

Users will still be able to view the place and appreciate its significance. The item is viewed from the footpath or by entering the site. The proposed development does not impact upon the ability to view and appreciate the site and its significance.

## **5.3 Item 296 is recorded as a Two Storey Victorian Rendered Masonry Store**

The following questions are extracted from the Heritage NSW Statement of Heritage Impacts Guideline: New Development Adjacent to a Heritage Item.

### **5.3.1 How is the impact of the new development on the heritage significance of the item or area to be minimised?**

The design concept considers the form and materiality of both the community and residential buildings within the Milton area. By using materiality that is common to the area, the school design included in the proposed development will sit easily within the surrounding context (Group GSA 2020:27). The design of the new buildings for the Budawang SSP are single level buildings which helps to reduce the visible impacts upon the site.

### **5.3.2 Why is the new development required to be adjacent to a heritage item?**

The Budawang SSP development is utilising the existing school grounds of the former Anglican School. This is a strategic decision by the NSW Education Department to make use of the existing school buildings on the site to address community education needs whilst also using the available space within the property to develop the purpose-built Budawang SSP.

The objectives of the development are to address the need for Special Purposes school accommodation in the Milton Ulladulla locality. The Budawang SSP concept design report prepared by Groups GSA (2020) describes this need as follows:

*'The existing Budawang School for Special Purposes is currently located on Camden Street in Ulladulla within buildings it has occupied since the 1980s. The entry criteria for students to Budawang SSP is an assessment of moderate to severe intellectual disability. Typically, this is coupled with other disabilities, conditions or*



*requirements, such as a sensory condition, autism, behavioural and/or emotional disorders, and/or severe physical disabilities. It is notable that the percentage of special needs within the entire school population for the South Coast of NSW is currently approximately 6%, which is notably higher than the NSW average.*

*The Camden Street Budawang SSP site is leased by the NSW Department of Education, for the purpose of a Special Needs School, however the current lease expires in December 2021. Existing facilities provide 5 homebases, which the Principal of Budawang states is inadequate compared to the number of students currently on the waiting list for enrolment at the school. Additionally, as the school has already been expanded by placement of demountable classrooms on the site, core facilities are inadequate for the current size of the school and there is insufficient outdoor space for learning and play. The existing buildings, particularly the core facilities, are in poor condition and have been assessed as being not fit for purpose. As the site is leased and is now too small to offer the required provision, relocation of Budawang SSP is necessary.'*

### **5.3.3 How does the curtilage allowed around the heritage item contribute to the retention of its heritage significance?**

The curtilage area shown in the Shoalhaven LEP includes the whole of Lot1 DP37905. It is Lot Boundary Heritage Curtilage.

### **5.3.4 How does the new development affect views to, and from, the heritage item? What has been done to minimise negative effects?**

The design of the proposed development attempts to ensure that the development sits within the context of the area. It includes single level buildings and includes a form and materiality common to the surrounding area including a roof style which references the local residential roofs.

The roof height for the buildings that form the proposed Budawang SSP are at a level of a maximum of 5.753 metres maximum height (refer to Figure 24). This height is approximately the same height as the existing pre-school building situated immediately to the west of the heritage site. A line of trees along the western boundary of Lots 1 and 2 DP37905 obscures the view from the heritage site into the school site (refer to Figure 20 to Figure 23). Figure 20 to Figure 23 below show that the existing pre-school is not visible from the heritage store when standing on the footpath to the north and south. The veranda on the heritage store does not face the school grounds so there is no impact to the views from the store veranda. The proposed development will not impact upon any views to the heritage store.



Figure 20: View north to the heritage store, LEP heritage Item 296.





**Figure 21: View south to the heritage store from the corner of Croobyar Road and Princess Highway.**



**Figure 22: View south to the heritage store from Croobyar Road.**



**Figure 23: View south showing the trees at the rear of the heritage store (Lot 1 and 2 DP37905) and the school ground behind the white fencing.**



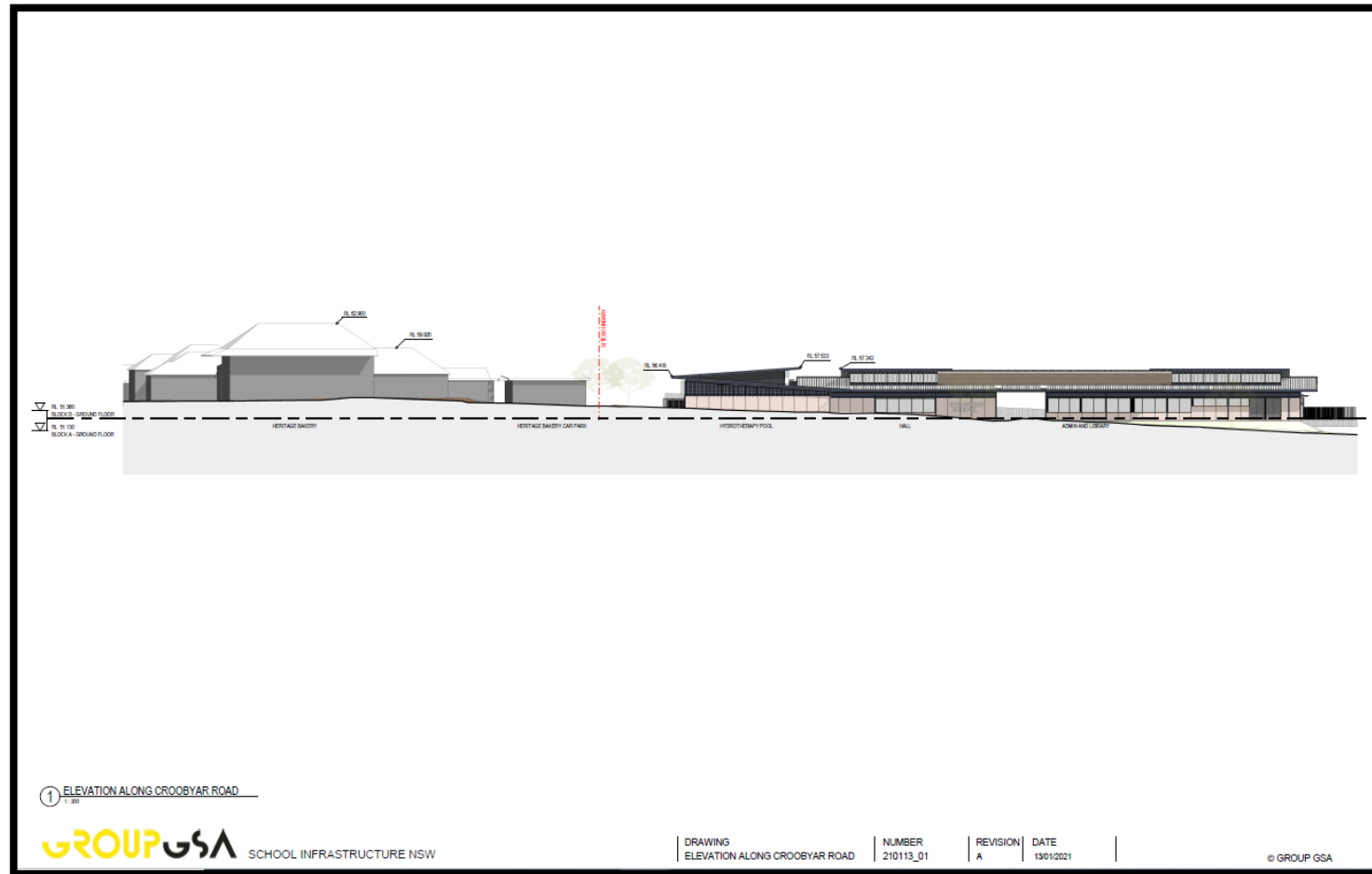


Figure 24: Drawing of the Budawang SSP design relative to the Heritage building 296.

**5.3.5 *Is the development sited on any known, or potentially significant archaeological deposits? If so, have alternative sites been considered? Why were they rejected?***

The proposed development is not sited on any known or potentially significant archaeological deposit.

**5.3.6 *Is the new development sympathetic to the heritage item? In what way (e.g. form, siting, proportions, design)?***

The proposed development has been designed to be sympathetic to the surrounding context (Group GSA 2020:27). The design of the new development includes single story buildings that are constructed downslope from the ridge crest on which the heritage item stands (refer to Figure 24). Provided the trees standing at the boundary of heritage item Lot 1 and the school Lot 200 remain in place, the design is considered to have minimal visual impact upon the heritage item.

**5.3.7 *Will the additions visually dominate the heritage item? How has this been minimised?***

The sympathetic design of the proposed development, including single story buildings designed to fit into the local context ensures that the Budawang SSP will not dominate the heritage item. The grove of trees standing at the rear of the Lots 1 and 2 DP37905 obscures the view from the heritage site into the former school and the site of the proposed Budawang SSP (refer to Figure 20 to Figure 23).

**5.3.8 *Will the public, and users of the item, still be able to view and appreciate its significance?***

Users will still be able to view the place and appreciate its significance. The proposed development is not considered to have any impact upon the view or ability to appreciate the item. Refer to the comments above in relation to the visible impacts of the proposed development.

**5.4 Summary and Recommendations**

The assessment of the impacts of the proposed new Budawang SSP development on the adjacent local heritage items 264 and 296 has concluded that the development will not adversely impact upon the heritage values of items 264 and 296. The proposed development will not impact upon the ability of the community to appreciate heritage items 264 and 296. The tree line standing at the boundary of heritage item Lot 1 DP37905 and the school Lot 200 DP1192140 should be maintained to help minimise visual impacts to and from the heritage item. If changes are made to the proposed design, these changes should be subjected to further evaluation to determine the potential impacts upon heritage items 264 and 296.

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