



Office of  
Environment  
& Heritage

DOC16/318320  
SSD 7372

Ms May Banh  
Planning Officer, Social & Other Infrastructure  
NSW Department of Planning  
GPO Box 39  
SYDNEY NSW 2001

Dear Ms Banh

**Exhibition of Proposed O'Connell Street Primary School, 24A O'Connell Street, Parramatta (SSD 7372)**

I refer to your email received 28 June 2016 by the Office of Environment and Heritage (OEH) seeking comments on the exhibition of the Proposed O'Connell Street Primary School at 24A O'Connell Street, Parramatta (SSD 7372).

OEH has reviewed the relevant documentation and provides comments on Aboriginal cultural heritage and floodplain risk management at Attachment 1.

If you have any questions about this matter, please contact Marnie Stewart, Senior Regional Operations Officer on 9995 6868 or [marnie.stewart@environment.nsw.gov.au](mailto:marnie.stewart@environment.nsw.gov.au).

Yours sincerely

*S. Harrison 15/08/16*

**SUSAN HARRISON**  
**Senior Team Leader Planning**  
**Regional Operations**

Contact officer: MARNIE STEWART  
9995 6868

## ATTACHMENT 1

### Office of Environment and Heritage comments on exhibition of Proposed O'Connell Street Primary School at 24A O'Connell Street, Parramatta (SSD 7372)

#### 1. Background

OEH understands that the proposal is for a new primary school on the site of the Old Kings School in Parramatta. The proposal involves the refurbishment of existing buildings for classrooms, administration and office spaces, staff facilities, a library and a canteen. OEH understands that the proposal also involves construction of a new hall and covered outdoor learning area.

#### 2. Aboriginal cultural heritage

OEH has reviewed the Old Kings School, Parramatta, Aboriginal Heritage Impact Assessment Report, Tonkin Zulaikha Greer Architects prepared by AHMS and dated 1 June 2016 (Report) and notes that it is still in draft form. This Report should have been finalised prior to going on exhibition and it is unclear why this has not occurred. As this is a draft report, the following comments relate to the version of the report that is dated 1 June 2016 only.

- The table on page 7 of the Report (Table 2 - Summary of Aboriginal consultation for the project) shows that consultation stages 4 (discussion of impact and mitigation options) and 5 (Report review) have not been undertaken. No explanation has been provided as to why this has not occurred. The Report would benefit from the consultation being completed and the results included and addressed in the final management and mitigation approach.
- The discussion of previous land use/existing disturbances provided in the Report references the historical report for the site, but does not provide sufficient detail in this regard. As a result, it is difficult to understand the approach taken with the assessment, particularly why the oval area, identified on Figure 7 of the Report as having low levels of disturbance, has not been subject to testing as part of the two phases of testing that have occurred to date.
- The Report notes that future decontamination works may be required at the site, but this is not elaborated on. The potential areas for decontamination works, what they might consist of and the consequent impact on Aboriginal objects have not been included. This information is important as it has ramifications for the significance of objects discovered on site and their future management. Decontamination testing, described in Appendix H2, has occurred across the oval area, but the results of this and its implications have not been discussed.
- The map at Figure 12 of the Report shows the extent of the Kings School PAD. Figure 13 shows the location of test pits, most of which are located outside the area of PAD. The reasons for this are not provided in the Report and it appears that the area where artefacts were recovered was subsequently identified as a site/included in the area of PAD. While OEH is aware that a recommendation has been made to re-name the Old Kings School PAD as Old Kings School AS1 and a new site card submitted to AHIMS, this does not appear to have happened to date. Section 89A of the *National Parks and Wildlife Act 1974* (NPW Act) requires that all objects should be recorded within a reasonable timeframe. OEH recommends that the site card is submitted as soon as practicable.
- An assessment of the potential impacts of the proposed development has not been articulated in the Report. Similarly with future infrastructure works and their impacts. A discussion of the consequence of these impacts on the significance of what has been found on site has not been included.
- The Old Kings School is a State Heritage Register listed site. This has not been discussed in the Report. While the site has not been listed for Aboriginal heritage values, the implication of the

State listing and how this will inform any management recommendations should form a part of this assessment.

- No discussion of the results of any testing for historical archaeology has been included, nor the potential of the discovery of contact archaeology.
- The lithics analysis has not been included in the Report.
- The significance assessment has been undertaken in accordance with requirements under the *Heritage Act 1977*, not the NPW Act. It is unclear why this is the case. The threshold indicators articulated in Table 10 are arbitrary and subjective and not appropriate for an assessment of Aboriginal heritage significance.
- It is unclear why the site has been assessed as being of local (potentially state) significance. The Report states that the sand body to the north of the Parramatta River has not been subject to much investigation to date and that the artefacts recovered are probably Pleistocene in date. Both of these factors indicate that the Aboriginal objects found here are of high significance and should be retained in situ, particularly as the majority of the site in the PAD has not been investigated.
- Section 10.3.1 – Intergenerational equity, states that the cumulative impact of the development on the cultural resource of the Parramatta region is difficult to gauge. OEH disagrees with this. The Parramatta region is currently subject to large scale development and the opportunities to retain significant areas of Aboriginal objects is diminishing. The rarity of the presence of potentially Pleistocene objects in this part of Parramatta indicates that this site is of high significance and impact through development will add to the cumulative destruction of the archaeological record in Parramatta, particularly in the Parramatta Sand Sheet (PSS).
- OEH notes that a very limited program of archaeological salvage has been proposed. It is unclear why it is so limited for such a potentially significant area. It is also unclear why retention in situ has not been proposed.
- OEH questions the proposed salvage methodology which specifies hand excavation in 50 x 50cm pits and 5cm spits, particularly when machine testing was deemed necessary for the testing. If retention in situ cannot be achieved, then a larger salvage should be undertaken. OEH recommends that the methodology conforms to other PSS excavations in Parramatta, i.e. 1x1m test pits in 20cm spits.

### 3. Floodplain risk management

The proposed development site is located above the 100 year ARI Parramatta River flood level but below the Probable Maximum Flood (PMF) flood extent. However, there is nearby uphill access to land which is above the PMF flood level.

The Flood Assessment - Old Kings School Parramatta prepared by Taylor Thomson Whitting (March 2016), advises that:

- The first floor of the buildings are above the PMF flood level, which provides onsite shelter in place; and
- A warning system shall be put in place to provide adequate time for students to proceed to higher ground if required.

The proponent should note that Parramatta City Council (Council) is currently investigating the installation of a Parramatta River flood warning system and the school's proposed warning system may be able to link into the Council system when installed. In relation to drainage, the impact of local drainage at trapped low points around buildings is adequately addressed in the Stormwater Management Report by Wood & Grieve Engineers (May 2016).

Given the above, OEH raises no concerns regarding the site's flood hazards in relation to this proposal.

(END OF SUBMISSION)

