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Job ID No: DOC16/242741
Your Ref: SSD 7237

Mr Peter McManus
Senior Planner
Social Infrastructure
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Sent by email to Peter.McManus@planning.nsw.gov.au

Dear Mr McManus

RE: Heritage Council comments on State Significant Development Application (SSD) for the Arthur Philip High School and Parramatta Public School, Parramatta: SSD 7237

I refer to your email dated 17 May 2016 inviting the Heritage Council of NSW (Heritage Council) to comment and provide recommended conditions of consent on the above SSD.

It is understood that the SSD proposes the following:

- Demolition of non-heritage structures on site;
- Construction of a new 17 storey school tower;
- Construction of a new 4 storey U shaped school building;
- Construction of a new 2 storey sports facility;
- Creation of passive recreation spaces;
- Retention and reuse of existing heritage buildings;
- Construction of a new private service lane between Macquarie Street and Barrack Lane; and
- Retention of the drop off bay in Little Street and provision for an additional six parking spaces.

The following comments and recommended conditions of consent are provided:

Built Heritage

The proposal does not involve physical modifications to state listed heritage items. However, there are several state listed items in the immediate vicinity of the development which could be impacted through the demolition and construction phase of the development.

It is noted that there are several locally listed items on and in the immediate vicinity of the site which will be impacted by the development. Therefore it is recommended that you seek comment on the heritage impacts of the development from The City of Parramatta Council.

It is recommended that the following conditions of consent be placed on any approval to manage the heritage issues as outlined above:

1. Vibration monitoring, performed by a suitably qualified vibration consultant, shall be carried out on all heritage items in the vicinity of the proposed works during demolition and construction. In the event that harm to heritage items is identified, vibratory activities are to cease and alternative work methods are to be implemented.
2. Significant building fabric and elements shall be protected during the works from potential damage. Protection systems must ensure historic fabric is not damaged or removed. All tradesmen and workers on site shall be made aware of the significant fabric on site.

Historical Archaeology

The Archaeological Assessment has identified the subject site has potential for state and locally significant archaeological relics and deposits which date from c.1819. These are associated with Government occupation (specifically military and convict barracks), municipal expansion from the mid -1840s through to the construction of the existing school in the late 1860s. The Assessment is unclear in explaining why the subject site has less potential for earlier occupation evidence to exist than the later phases. The subject site has had two main cut and fill events associated with the school occupation, however the archaeologists have to some degree assumed the level of cut and demolition activities involved in the construction of the gymnasium has removed all evidence or highly truncated it. Some heavy disturbance is noted, particularly in areas such as the eastern half of the north portion of the site, however the comparative analysis has identified significant survivability of archaeological deposits are possible in this part of Parramatta. The Heritage Division further notes the assessment has concluded the site contains potential for state significant archaeological remains associated with the 1819-1820 convict barracks and lumberyards. Evidence of mid-late nineteenth century occupation has been assessed as being of local heritage significance, however some of this evidence may also be of state significance.

The site is identified in the Parramatta Historical Archaeological Landscape Management System (PHALMS) as containing significant research potential and potential for state significant archaeology. That conclusion has not been changed by this assessment's additional research.

It is noted that the impacts of the main construction works have been considered by GML Heritage and these are focused on areas currently identified as having a low potential to contain significant archaeological remains. However this conclusion has not been verified and archaeological testing may provide additional information which could be used to clarify the location of the detailed design elements.

To address this the Heritage Council recommends the following conditions of approval:

1. A phase of archaeological testing shall be undertaken across areas of proposed harm as soon as possible to inform the detailed design for this site. Avoidance of state significant archaeological deposits and substantially intact archaeological evidence should be employed by the works.
2. The testing shall be guided by an appropriate research design, excavation methodology and be directed by a suitably qualified and experienced excavation director who fulfils the Heritage Council's Excavation Director Criteria for the excavation of state significant archaeological sites.
3. The testing results shall guide the next stage of development. Areas of state significant archaeology and substantially intact archaeological evidence shall be appropriately managed and avoided wherever possible in the design.
4. In the event this is not possible in whole or in part, detailed full archaeological salvage shall be undertaken. This shall be guided by an appropriate research design, excavation methodology and be directed by a suitably qualified and experienced excavation director who fulfils the Heritage Council's Excavation Director Criteria for the excavation of state significant archaeological sites.
5. A final excavation report shall be prepared within 12 months of the completion of archaeological works on site. It should also include details of any artefacts recovered, where they are located and details of their ongoing conservation and protection in perpetuity by the land owner. Copies shall

be provided to the Department of Planning and Environment, the Heritage Council and to the Parramatta Local studies unit.

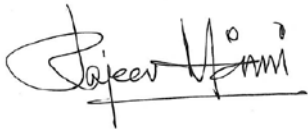
6. An Interpretation strategy shall be prepared and provided to the Heritage Council of NSW for review and comments incorporated within 18 months of the completion of archaeological excavations on site. This strategy shall include details of the archaeological investigation of the site and how the results will be incorporated into the completed development.

Indigenous Archaeology

Please note that these comments do not relate to Indigenous archaeology because it is understood that the project has been separately referred to relevant sections of the Office of Environment and Heritage (OEH) for specific review.

If you have any further enquiries regarding this matter, please contact Felicity Barry, Senior Archaeologist at the Heritage Division, Office of Environment and Heritage, at felicity.barry@environment.nsw.gov.au or (02) 9995 6914.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rajeev Maini', with a horizontal line drawn underneath.

Rajeev Maini
Acting Manager, Conservation
Heritage Division
Office of Environment & Heritage
As Delegate of the NSW Heritage Council
16 June 2016