

ITEM OF MOVEABLE HERITAGE	CURRENT LOCATION	IMAGE
Blackboard (1867)	Building 2, Room 221	
Timber letter bureau (1891)	Building 2, Room 231	
Junior university plaque containing student names (1912)	Building 2, Room 233	
Portrait of Mr Webster	Building 3, Room LG301	

ITEM OF MOVEABLE HERITAGE	CURRENT LOCATION	IMAGE
Woodwork table (1924)	Building 3, Room LG308	
Glazed noticeboard (1924)	Building 3, Room G321	

## 4.7 Landscape Features

The existing buildings on site cover a large area of the site footprint and the resulting spaces around the buildings form a series of important courtyard spaces. The courtyards are typically asphalt surfaces, with various sporting courts marked on the surfaces, and there are also areas of concrete, in particular in the undercroft to Building 4. As such, the areas of hard landscaping form the primary landscape character of the site, however this is offset by the presence of some mature vegetation within the courtyards and the visual connection of the site to Prince Alfred Park.

Mature vegetation is present in the south west courtyard – including two Moreton Bay fig trees (refer Figure 4.67), main courtyard – including several London plane trees and eucalypt (refer Figure 4.68 to Figure 4.70), and north west courtyard -which includes a well-established Moreton Bay fig tree (refer Figure 4.72) and Queensland Kauri pine tree (refer Figure 4.66). The mature vegetation contributes to the visual amenity of the site. It is noted that the south west and north west courtyards were quite heavily vegetated in the 1949 aerial image of the site (refer Figure 2.23) and the existing Moreton Bay fig trees and Queensland Kauri pine were likely present on the site at this time. By contrast, the main courtyard was relatively devoid of vegetation and that which was there is no longer present, having likely been removed in conjunction with construction of Building 4. The existing vegetation in the main courtyard is likely to have been introduced to the site subsequent to this new development.

There is also more relatively recent and minor planting within the main courtyard, including within raised brick planter beds, and along the western boundary of the north west courtyard (refer Figure 4.71).





FIGURE 4.67 VIEW SOUTH SHOWING MATURE FIG TREES IN THE SOUTH WEST COURTYARD.



FIGURE 4.68 GENERAL VIEW NORTH INTO THE MAIN COURTYARD SHOWING EXISTING LANDSCAPE CHARACTER.



FIGURE 4.69 MATURE PLANE TREES ARE AN IMPORTANT FEATURE OF THE MAIN COURTYARD.





FIGURE 4.70 VIEW SOUTH WITHIN MAIN COURTYARD SHOWING PLANE TREE.



FIGURE 4.71 VIEW TOWARDS NORTH WEST CORNER OF THE SITE SHOWING MORE RECENT PLANTING PRESENT IN THE NORTH WEST COURTYARD.



FIGURE 4.72 MATURE FIG TREE IN THE NORTH WEST COURTYARD.

## 5 ARCHAEOLOGY

### 5.1 Historical Archaeological Potential

#### 5.1.1 Archaeological Zoning Plan

Whilst there is no Archaeological Zoning Plan specifically for the site at 244 Cleveland Street, Surry Hills, it is bounded by Prince Alfred Park which is included in the *Central to Eveleigh Corridor Aboriginal and Historical Heritage Review (CECA&HHR)* prepared by Archaeological & Heritage Management Solutions 2015. Prince Alfred Park is identified as a *campsite through to the mid-19<sup>th</sup> century* in table 3 of the CECA&HHR. The Park has been identified as a site *associated with post-contact Aboriginal occupation of the study area and is listed as an Area of Archaeological Potential (AAP)* in the Central Sydney Archaeological Zoning Plan (AZP).

The AZP is a non-statutory guideline document that documents and assesses the archaeological potential of the City of Sydney and is a reference guide used by the Council to inform the determination of Development Applications.

#### **The archaeological assessment of roads, lanes, parks, plazas and other open spaces**

*All parks within the study area were surveyed and the majority were assessed as containing archaeological potential and have been included in the schedule of sites / areas. In general, in the absence of evidence to the contrary, all open spaces, whether identified in this study or not, should be considered as containing some archaeological potential until a further assessment is undertaken.*

#### **Area of Archaeological Potential (AAP)**

*An allotment of land or feature that has been identified in the field survey as being an area of high archaeological potential due to limited physical disturbance (usually due to the most recent building development). This category includes both above and below ground archaeological features such as remnant structures, significant fabric of extant buildings / structures, as well as below ground sites. Most areas identified will contain sites of former occupations / activity and buildings. These sites may be known through historic documentation (not undertaken as part of this project), or may become evident during the fieldwork. An example of the latter is within currently vacant allotments (generally development sites and car parks), where the shadows or outlines of the most recently demolished structures are evident on the walls of adjoining buildings.*

*Areas of Archaeological Potential are indicated by dark grey shading on the field survey plan. Where specific above ground features have been identified, they have been noted as part of the building allotment / street on which they are located in the schedule of sites.*

Subclause 8 of Clause 5.10 of Sydney Local Environmental Plan 2012 (SLEP 2012) states:

*The consent authority must, before granting consent under this clause to the carrying out of development in an Aboriginal place of heritage significance:*

*(a) consider the effect of the proposed development on the heritage significance of the place and any Aboriginal object known or reasonably likely to be located at the place by means of an adequate investigation and assessment (which may involve consideration of a heritage impact statement), and*

*(b) notify the local Aboriginal communities, in writing or in such other manner as may be appropriate, about the application and take into consideration any response received within 28 days after the notice is sent.*

Archaeological assessment of the subject site has been undertaken in conjunction with preparation of this Conservation Management Plan and the CMP should be read in conjunction with the attached Archaeological Assessment of 244 Cleveland Street, Surry Hills, prepared by Casey & Lowe Pty Ltd; and the Aboriginal Archaeological Assessment of 244 Cleveland Street, Surry Hills, prepared by Comber Consultants.

### 5.1.2 Historical Archaeological Potential

The archaeological assessment prepared by Casey and Lowe (2016) found that potential archaeological remains at the former Cleveland Street Public School relate to the 1855 school, the c.1855 Wesleyan parsonage and a c.1865 brick oviform drain and earlier creek line. Archaeological remains related to the use of the site as part of a park and Cleveland Paddock are also possible, but less likely. This potential evidence may be in the form of foundations of various structures, and artefact deposits such as rubbish pits and backfilled cesspits. Evidence for landscaping, clearance and gardening activities is also possible. The interiors of the standing buildings were considered to have no archaeological potential.

These potential remains have limited ability to provide further information regarding the original layout of the school and parsonage, and the way in which these facilities were used. If archaeological deposits associated with the occupation of the site were located, these would provide information regarding the material culture and patterns of consumption of the occupants. Evidence for how the natural topography of the site has been modified, particularly in the vicinity of the former creek line, is also possible. This information is unlikely to be available from other sources, such as historical records, and it would add to the knowledge of the history of government educational facilities in NSW, and possibly also the development of the Wesleyan community. The potential archaeological remains are of local heritage significance.

Casey and Lowe's recommendations are as follows:

1. The proposed design indicates there is a small possibility that archaeological remains of potential local heritage significance will be impacted during construction works. In order to mitigate this impact, archaeological monitoring is recommended.
2. A program of archaeological monitoring needs to be undertaken by an appropriately qualified archaeologist, as outlined in Section 6.0 of their report [attached]
3. A report presenting the results of the archaeological program and artefact catalogue will be a condition of consent and will be prepared at the end of the archaeological program.
4. Any archaeological program needs to be reported on in accordance with Heritage Council guidelines.
5. Any artefacts collected and retained during the works will need to be catalogued and then securely stored by the client after the completion of the archaeological program.

## 5.2 Aboriginal Archaeological Desktop Study

### 5.2.1 Aboriginal Archaeological Context

A search of the AHIMS Register revealed there are no previously recorded Aboriginal objects/sites or gazetted places on the subject site at 244 Cleveland Street, Surry Hills. Furthermore, a search of the AHIMS Register revealed that there are no previously recorded Aboriginal objects/sites or gazetted places on the adjacent site, Prince Alfred Park.

### 5.2.2 Aboriginal Archaeological Potential

An Aboriginal archaeological assessment of the former Cleveland Street Public School by Comber Consultants (2016) notes the school as being a significant area for Aboriginal people prior to and following colonisation, until at least 1850. Collins in 1793 described the Aboriginal people of Sydney as choosing a location encompassing the school for “the performance of any of their rites and ceremonies”, indicating the significance of the area to the Aboriginal community. The area continued to be used as an Aboriginal ceremonial meeting place throughout the following years and a “place whence they derived so many comforts and so much shelter in bad weather” (Collins 1802: Oct 1976). These descriptions also indicate that this was an area where contact between Aboriginal people and European settlers occurred. The school lies within an important trade and movement corridor between Cockle Bay and Botany Bay for Aboriginal people. It demonstrates the historic values associated with the occupation and ceremonial use of the site. Prior to the arrival of Europeans, the study area would have been an attractive location for Aboriginal people as it had access to Blackwattle Creek, Shea’s Creek, Cockle Bay and the extensive surrounding swamplands which extended from the University of Sydney to Centennial Park. Archaeological investigations have the potential to reveal substantial information about the precontact and contact Aboriginal occupation of the Sydney basin and the study area and immediate surrounds. The school provides a rare example of an Aboriginal ceremonial meeting place and campsite in the Sydney basin which can provide significant information about the precontact and contact Aboriginal occupation of the area. It may be that evidence of precontact and contact Aboriginal occupation still remains beneath the school buildings, which were constructed with minimal disturbance. The site types that could be expected would be artefact scatters, isolated finds and shell middens.



## 6 COMPARATIVE ANALYSIS

The former Cleveland Street Public School is one of many schools designed by George Allen Mansfield, most of which were single-storey schools. However, the School's size and scale make it an example of a far rarer group of schools known as the 'palace schools'. This group of schools consisted of Cleveland Street School and only three others: Sussex Street Primary School, Crown Street Public School and Blackfriars Public School. The former Cleveland Street Public School was the first of the palace schools.

### 6.1.1 Sussex Street Public School

The former Sussex Street Public School, built in 1875-1876, is the only surviving former government school in the Sydney Central Business District. It was designed by G A Mansfield and is representative of his educational work. The school was a focus for the residential community which predated the extensive construction of warehouses in the western precinct of Sydney. It closed as a school in 1912, later housing the Flying Angel Seafarers Centre. The building is face brick with sandstone, set on sandstone foundations. It was designed in institutional Gothic revival style, with decorative brickwork, gabled windows projecting onto the roof and verandah valance of timber framework. The main gable features a group of three windows recessed in brickwork contained under a lancet arch. Inside are a series of large teaching spaces with exposed trusses.



FIGURE 6.1 SUSSEX STREET

PUBLIC SCHOOL SOURCE: NSW DEPARTMENT OF EDUCATION

Aesthetically it is similar to the former Cleveland Street Public School, with both being substantially intact examples of Mansfield's 'palace' style of school architecture.

### 6.1.2 Crown Street Public School

Crown Street Public School, designed by G A Mansfield, was built in 1879. The school buildings reflect the rapid growth of Surry Hills and Darlinghurst as residential areas in the mid to late nineteenth century. The walls are constructed of face brickwork on sandstone foundations featuring



stone dressing around windows and sills, cornices, and finely detailed parapet cappings. The plan is asymmetrical with a centrally placed three storey tower that has a fine metal roofed spire. The roof over the main building is steeply pitched in a form similar to a mansard roof and is sheeted with corrugated metal (Sheedy 1977).

Like the former Cleveland Street Public School site, the Crown Street Public School site has been in continuous use as a site of education. Indeed, first used for this purpose in 1849, the Crown Street Public School site predates the construction of the original Iron School on the former Cleveland Street Public School site. However, the existing 'palace school' designed by Mansfield at the former Cleveland Street Public School predates its Crown Street equivalent by twelve years.



FIGURE 6.1 CROWN STREET PUBLIC SCHOOL

SOURCE: SUPPLIED BY CROWN STREET PUBLIC SCHOOL, 2016

### 6.1.3 Blackfriars Public School

The former Blackfriars School, built c.1885, consists of a group of three two-storey sandstock brick buildings with sandstone base walling and dressings. It was designed by G A Mansfield in the Victorian Free Gothic style. It was the first school planned after the Public Instruction Act of 1880. It consists of a group of three two-storey sandstock brick buildings with sandstone base walling and dressings, around which are located single storey timber framed weatherboard buildings.

The former Blackfriars School's grand landmark status has been somewhat reduced by the raised street level of Buckland Street. Aesthetically it is comparable to the former Cleveland Street Public School, with both being intact examples of Mansfield's 'palace' style.

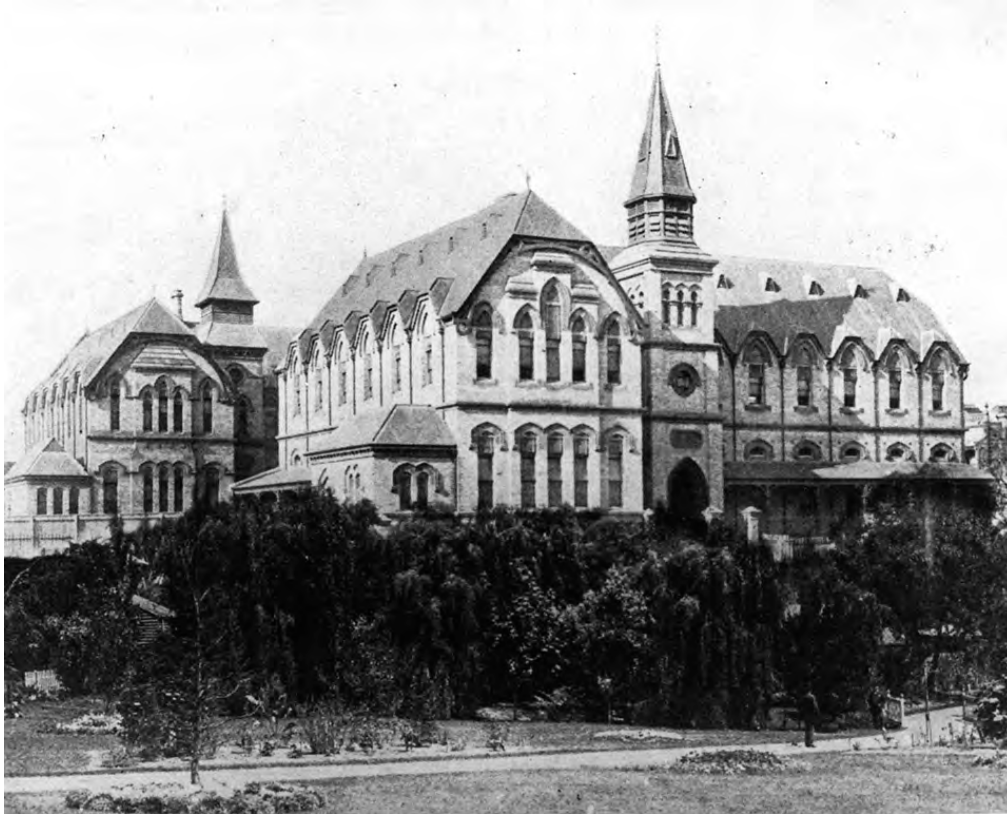


FIGURE 6.2 FORMER BLACKFRIARS PUBLIC SCHOOL

SOURCE: STATE RECORDS NSW

#### 6.1.4 The importance of the former Cleveland Street Public School

The former Cleveland Street Public School is an intact, representative example of G A Mansfield's 'palace' schools, of which there are three other examples within the Sydney Local Government Area. The former Cleveland Street Public School is the earliest of the four, however all four were constructed within a two-decade period between 1867 and c. 1885. The exterior fabric of all four remains substantially intact, although only the former Cleveland Street Public School and the Crown Street Public School have remained in continuous use as schools.

This comparative study proposes that the former Cleveland Street Public School remains an important, representative local example of G A Mansfield's 'palace' schools. The exterior fabric is intact and the site has been in continuous use as a site of public instruction since the mid nineteenth century.

## 7 STATEMENTS OF SIGNIFICANCE

This report adopts the methodology and terminology of the *Burra Charter* (2013), *The Conservation Plan* by JS Kerr (7<sup>th</sup> edition 2013) and the criteria of the Heritage Division, within the Office of Environment & Heritage, Department of Premier and Cabinet in the assessment of significance.

The NSW heritage assessment criteria provided in the NSW Heritage Manual *Assessing Heritage Significance* (NSW Heritage Office, July 2001) encompass the following four values in the Australia ICOMOS Burra Charter, 2013, which are commonly accepted as generic values by Australian heritage agencies and professional consultants:

- historical significance
- aesthetic significance
- scientific significance (which includes Archaeological Significance)
- social significance (current social value)

Article 1.2 of the Burra Charter defines *cultural significance* as the aesthetic, historic, scientific, social or spiritual value for past, present or future generations.

Article 26.1 of the Burra Charter states that:

*Work on a place should be preceded by studies to understand the place which should include analysis of physical, documentary, oral and other evidence, drawing on appropriate knowledge, skills and disciplines.*

Once the place has been studied, the cultural significance can be assessed. The sections below evaluate the cultural significance of the place by considering the documentary and physical evidence presented in the preceding sections of this report. The physical evidence includes not only the original fabric but the subsequent layering of fabric over the life of the building. Understanding significance enables decisions on the future management of the place. It is important that the future decisions do not jeopardise the cultural significance of the place.

The assessment criteria used in this CMP to develop the Statement of Significance conform to those set by the NSW Heritage Division for nomination as items of either Local or State heritage significance. These categories are:

*Historic Significance (Criterion A & B)*

*Aesthetic Significance (Criterion C)*

*Social Significance (Criterion D)*

*Scientific or Technical Significance (including Archaeological Significance - Criterion E).*

*Rarity and Representativeness Significance (Criterion F & G).*

### 7.1 Assessment of Significance for Cleveland Street Public School

#### Criterion A - Historical Evolution

*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).*

The former Cleveland Street Public School is historically significant in the evolution of public education in NSW. The original 'Iron School', established in 1855, was one of the first non-denominational 'National' Schools in metropolitan Sydney. Today it is one of the oldest public schools still operating on its site. From the construction of the first permanent building in 1867, the school has acted uninterrupted as a site of public education, offering a window into the historical evolution of public education in NSW, and the importance governments have placed on it over time. Classrooms were among the earliest in Australia to provide flat floors and desks rather than raked seating.

Cleveland Street Public School, specifically the 1867 building, has historic significance as the first of the 'palace' schools, which were notable for their size and scale.

The former Cleveland Street Public School is significant as part of the Government/Cleveland Paddocks and part of the Victorian and later development of the area encompassing Surry Hills, Redfern and Chippendale.

<b>Cleveland Street Public School</b> site satisfies Criterion A at a STATE level.
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#### **Criterion B - Historical Associations**

*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).*

The former Cleveland Street Public School is associated with a number of historically important architects. Most notably, in 1867 it was the first of the so-called 'palace' schools designed by G A Mansfield. The school has expanded since then, with each new addition by a prominent architect. In c1891 two two-storey buildings in the Federation Free style designed by W E Kemp complimented Mansfield's earlier Victorian Free Gothic style buildings. Further additions to the school over the course of the twentieth century associate W L Vernon, R M S Wells, and E H Farmer with the school, all notable architects.

At the time of construction of the 1867 building, Frederick Bridges, major education reformer in NSW, was acting as headmaster.

The School is associated with the National School Board and its successors, including the Department of Public Instruction and the Department of Education. Since 1981 the School has been associated with the Cleveland Street Intensive English Centre.

Many graduates of the school became involved in many areas of political, legal, commercial, academic, sporting and artistic life in NSW. The introduction of the New School Certificate and Higher School Certificate was based on recommendations made by the NSW Director of Education, Harold Wyndham, a former pupil of Cleveland Street Public School.

<b>Cleveland Street Public School</b> site satisfies Criterion B at a STATE level.
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**Criterion C - Aesthetic Values**

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

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

The former Cleveland Street Public School is of local aesthetic significance. The original school building is a grandly detailed and picturesque example of a Victorian Gothic school complex and the first to include a covered playground in the basement. As a grouping of buildings, the school effectively reflects the work of a succession of architects and changing styles over time. Each building has individual aesthetic significance, but they also hold significance collectively, for there are shared characteristics of material and design form between the buildings. The school buildings provide physical evidence of the importance that governments through time have placed on public education.

Building 1, designed by W E Kemp c1891, is an intact, representative example of a Federation period school building, also with Gothic details. It retains its original scale, form, character and details, including face brick and stone facades, pitched roof, pattern of openings, timber windows and doors and features such as the roof lantern.

Building 2, designed by G A Mansfield in 1867, is an intact, representative example of a Victorian Free Gothic style school building, one of Mansfield's 'palace' type schools. Despite the addition of the southern wing and internal modifications, the building retains its original form, scale and details including face brick and stone facades and details, pitched roof and prominent central tower with main entry and spire, pattern of openings and timber framed windows and doors. The building also retains a strong sense of its early internal layout and spatial quality, fabric and features including the main hall and stair within the tower. The building is believed to be one of the earliest in Australia to incorporate a covered playground area within the basement of the building.

Building 2 and to an extent Building 1 are also highly significant in the way that the buildings responded to the site and change of street levels around the original allotment. Both buildings are significantly elevated above basement areas.

Building 3 is a good, representative example of an Inter-War period school building that also retains its original scale, form, fabric and details, including face brick facades and associated rendered details and mouldings, pattern of openings, windows and doors, pitched roof forms and internal layout and spatial qualities and details.

Building 4 is a representative example of a late 20<sup>th</sup> century educational building with Brutalist details that also retains its overall scale, character, fabric and details and internal layout. The building is a visible element in the neighbouring park, however its overall character and presentation is degraded by the deterioration of the concrete structure.

The school occupies a prominent corner site and Buildings 1, 2 and to some extent 3, make a positive visual contribution and have landmark status on the Cleveland and Chalmers Streets streetscapes. The buildings are enhanced by early stone retaining walls, stone piers and wrought iron palisade fencing and mature trees including large Figs in the south-western section of the site, eucalypts and London Planes in the mid-section, and significant Queensland Kauri near the northern site boundary and open playground areas. The site is also enhanced by the surrounding park and elements including open green area and lawns, mature trees and plantings.

**Cleveland Street Public School** site satisfies Criterion C at a LOCAL level.

**Criterion D - Social Values**

*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).*

The buildings reflect the importance of public education within the development of Sydney. The school has had a long association with the residents of Redfern, Chippendale and Surry Hills, for whom it has served continuously as a centre for public education since the 1860s. The growth and development of educational facilities on the site reflects the evolving local demographic.

Cleveland Street Public School likely has social significance for students and teachers, both former and current including recent migrants through the Cleveland Street Intensive English High School, for providing education.

<b>Cleveland Street Public School</b> site satisfies Criterion D at a LOCAL level.
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**Criterion E - Technical Values**

*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).*

As the former Cleveland Street Public School is reflective of the work of a succession of architects over time, it has the potential to reveal information about the design of educational buildings and institutions across different eras. In particular, Buildings 1 and 2 are of high technical value as early school buildings that responded to the site, which retain early stone, brick, steel and timber structure and fabric.

The school's technical significance is enhanced by it representing one of the earliest examples of the use of cavity walls in construction to exclude damp and heat, and the use of vents to reduce heat.

The school may be an area of high Aboriginal archaeological potential (Comber Consultants 2016). It is described as a significant area for Aboriginal people prior to and post colonisation, until at least 1850. It is a rare example of an Aboriginal ceremonial meeting place and campsite in the Sydney basin which can provide significant information about the precontact and contact Aboriginal occupation of the area. It may be that evidence of precontact and contact Aboriginal occupation still lies beneath the school buildings, which were constructed with minimal disturbance. The site types that could be expected would be artefact scatters, isolated finds and shell middens. Subject to the findings of any further archaeological testing and salvage, the former Cleveland Street Public School's Aboriginal archaeological potential may warrant the site being reconsidered for state significance.

Further potential archaeological remains at the former Cleveland Street Public School are of local heritage significance (Casey and Lowe 2016). They relate to the 1855 school, the c.1855 Wesleyan parsonage and a c.1865 brick oviform drain and earlier creek line. Archaeological remains related to the use of the site as part of a park and Cleveland Paddock are also possible, but less likely. This



potential evidence may be in the form of foundations of various structures, and artefact deposits such as rubbish pits and backfilled cesspits. Evidence for landscaping, clearance and gardening activities is also possible. The interiors of the standing buildings have no archaeological potential.

These potential remains have limited ability to provide further information regarding the original layout of the school and parsonage, and the way in which these facilities were used. If archaeological deposits associated with the occupation of the site were located, these would provide information regarding the material culture and patterns of consumption of the occupants. Evidence for how the natural topography of the site has been modified, particularly in the vicinity of the former creek line, is also possible. This information is unlikely to be available from other sources, such as historical records, and it would add to the knowledge of the history of government educational facilities in NSW, and possibly also the development of the Wesleyan community.

**Cleveland Street Public School** site satisfies Criterion E at a LOCAL level.

#### **Criterion F - Rarity**

*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).*

Cleveland Street Public School is a largely intact example of a Victorian Gothic school complex, and is believed to be one of the earliest in Australia to incorporate a covered playground within the basement of the building. It is an example of a rare group of schools known as the 'palace' schools, of which it was the first. The school's rarity is heightened by each addition to Mansfield's design itself being the work of a notable, historically important architect.

**Cleveland Street Public School** satisfies Criterion F at a LOCAL level.

#### **Criterion G - Representativeness**

*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).*

The former Cleveland Street Public School is a good, intact, representative example of a Victorian Free Gothic style school that has evolved over time in response to changes in the education system and changing demographics in the local area. The school can also be seen as representative, not least by way of the stature of successive architects and the quality of their architecture, of the battle between the churches on the one hand and the Education Department and its predecessors on the other, over the secularisation of education in NSW and the State's attempt to monopolise education in the late nineteenth and early twentieth centuries.

**Cleveland Street Public School** site satisfies Criterion G at a STATE level.

### 7.1.1 Summary Levels of Significance Matrix

Criterion	Description	Level of Significance
<b>A</b>	An item is important in the course, or pattern, of NSW's / the local area's cultural or natural history.	<b>STATE</b>
<b>B</b>	An item has a strong or special association with the life or works of a person or group of persons, of importance in NSW / the local area's cultural or natural history.	<b>STATE</b>
<b>C</b>	An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW / the local area.	<b>LOCAL</b>
<b>D</b>	An item has a strong or special association with a particular community or cultural group in NSW / the local area for social, cultural or spiritual reasons.	<b>LOCAL</b>
<b>E</b>	An item has potential to yield information that will contribute to an understanding of NSW's / the local area's cultural or natural history.	<b>LOCAL</b>
<b>F</b>	An item possesses uncommon, rare or endangered aspects of NSW's / the local area's cultural or natural history.	<b>LOCAL</b>
<b>G</b>	An item is important in demonstrating the principal characteristics of a class of NSWs / the local area's cultural or natural places or cultural or natural environments.	<b>STATE</b>

## 7.2 Summary Statement of Cultural Significance

The former Cleveland Street Public School has historical significance as one of the oldest public schools still operating on its site. It is particularly significant as the first of the so-called 'palace' schools designed by G A Mansfield. Subsequent additions to the school associate it with a number of other prominent architects, including W E Kemp, W L Vernon, R M S Wells and E H Farmer. The school is believed to be one of the earliest in Australia to incorporate a covered playground within the basement of a building. The school is aesthetically significant as an intact Victorian Free Gothic style school, and as a grouping of buildings that reflects the work of a succession of architects and changing styles and educational imperatives over time. It is socially significant through its association with education, acting as a centre for public education in the area continuously throughout its history. The area encompassing the school has been noted as significant for Aboriginal people both prior to and post European colonisation, and has been assessed to be an area of high Aboriginal archaeological potential.

## 8 GRADING OF SIGNIFICANCE

The following section determines a level of significance for the individual elements of the place as the various components of a place may contribute differently to its overall heritage value. To determine levels of significance the terms Exceptional, High, Moderate, Little and Intrusive are used. A list of building elements and features are ranked individually and form the basis for determining policies for the protection of significant fabric and spaces. These gradings of significance are based upon the established criteria set down in the NSW Heritage Manual, *Assessing heritage significance*, 2001.

<http://www.environment.nsw.gov.au/resources/heritagebranch/heritage/listings/assessingheritage/significance.pdf>

Grading reflects the contribution the element makes to the overall significance of the item (or the degree to which the significance of the item would be diminished if the component were removed or altered).

The site was inspected by OCP Architects between April and June 2016. Inspections were visual only, and were limited where some areas of the site were not accessible at the time of inspection and where fitout and furniture prevented full inspection. No fabric was opened up.

The grading or ranking of significance of the elements of Cleveland Street Public School have been assessed in terms of the following aspects of significance:

- Original or early construction (relative age)
- Original/early architectural/aesthetic quality
- Ability to demonstrate a rare quality, craft of construction process
- Integrity and degree of intactness of spaces and physical fabric
- Extent and quality of subsequent alterations /additions

In accordance with procedures recommended in *The Conservation Plan*, the significance of the various elements of the site have been assessed in accordance with the criteria listed above. The elements and fabric which contribute to the overall significance of the place have been analysed and these are graded according to the level of their contribution.

The term interpretation or interpretability is used in the sense of the ability to explain the meaning of the place, of making the significance of the place understood, or more meaningful. It is also used when a component is of slight or no significance, meaning it is difficult to interpret or unable to be interpreted, not an important function, often subject to alteration, detracting from significance and/or significant fabric.



### 8.1.1 Grading of Significance Table

Grading	Description of grading	Status
Exceptional	<p>Rare or outstanding element directly contributing to an item's (the site's) local and state significance.</p> <p>Usually high degree of undisturbed fabric or attributes that embody heritage significance. Loss or alteration, or incompatible works to it or in its vicinity would greatly diminish its heritage value. Has a high degree of interpretability</p>	<p>Fulfils criteria for local or state listing.</p> <p>Elements and fabric that embody/demonstrate significance values must be preserved. Preserve, restore, reconstruct in accordance with the Burra Charter. If adaptation is necessary for the continued use of the item, minimise changes, do not remove or obscure significant fabric. Design changes so they are reversible.</p>
High	<p>High degree of original or early fabric. Demonstrates a key element of the items' (site's) significance. Alterations do not detract from significance. Can be easily interpreted and understood providing information about the changing patterns of use of the place.</p> <p>Existing disturbance and evidence of change does not detract from its individual or contributory significance. Loss or unsympathetic further disturbance or change of it or in its vicinity would diminish significance.</p>	<p>Fulfils criteria for local or state listing.</p> <p>Elements and fabric that embody/demonstrate significance values should be preserved. Preserve, restore, reconstruct in accordance with the Burra Charter. If adaptation is necessary for the continued use of the item, minimise changes, do not remove or obscure significant fabric. Design changes so they are reversible. In this case the condition of some of the elements will affect the feasibility of conserving them.</p>
Moderate	<p>Altered or modified elements. Elements with little heritage value, but which contribute to the overall significance of the item (site). The elements are capable of being interpreted.</p> <p>Loss or unsympathetic further disturbance or change is likely to diminish heritage significance.</p>	<p>Fulfils criteria for local or state listing.</p> <p>Aim to retain most of the significant fabric. Conservation of the overall form and configuration is desirable. Some of these items are already substantially altered and can accommodate further major changes. Compatible new construction can be added and fabric may be removed in part as necessary to accommodate new uses. If adaptation is necessary, more changes can be made than would be possible for fabric of state significance, but the same principles apply. Wherever possible, additions should be designed to be reversible. Retention may depend on issues other than heritage value, such as financial viability.</p>

Grading	Description of grading	Status
Little	<p>Alterations may detract from significance and may be difficult to interpret.</p> <p>Loss or unsympathetic disturbance may diminish individual heritage significance but would not diminish the overall significance of the place.</p> <p>Includes modifications where, although they indicate the changes in use over time, the actual fabric is not significant.</p>	<p>Does not fulfil criteria for local or state listing.</p> <p>Fabric of little significance may be retained, modified or removed as required for the future use of the place, provided that its removal causes no damage to more significant fabric. In the case where the fabric is neutral and the configuration is significant, the fabric should be retained until replacement is required.</p>
Intrusive	<p>Elements that, in their present form, damage the item's heritage significance. This category includes visually intrusive fabric, which obscures the reading of the significant uses and periods of development.</p>	<p>Does not fulfil criteria for local or state listing.</p> <p>Remove or alter intrusive fabric to reduce the adverse impact when the opportunity arises, whilst minimising damage to adjacent fabric of significance.</p>

### 8.1.2 Levels of Significance Items and Spaces

Within the former Cleveland Street Public School site, its component items are of varying levels of heritage significance. The following table and diagram indicates the relative significance of the main buildings, structures and spaces according to the definitions above. It is important to note that the level of significance of some individual elements of items will vary from the overall level of significance.

The overall gradings of significance for the buildings, items and spaces are provided in the table on the following page. Refer to the individual room survey schedules for Buildings 1 to 3, prepared by OCP Architects in June 2016, (in separate volume) for comprehensive information on the gradings of significance for individual elements.

BUILDING, STRUCTURE OR SPACE	LEVEL OF SIGNIFICANCE
Building 1	Exceptional
Building 2	Exceptional
Building 3	High
Stone retaining walls and steps, heavy stone piers at the north eastern and south western corners of the site, and wrought iron palisade fencing	High
Mature Moreton Bay Fig trees and Queensland Kauri pine tree	High **
Main Courtyard	Exceptional
North East Courtyard	High
South East Courtyard	High
South West Courtyard	High
North West Courtyard	Moderate
Covered walkways	Intrusive
Mature London Plane and eucalypt trees	Moderate **
Building 4	Little
Modern signage and modern, high steel palisade fencing	Little
Historical archaeological significance	Little
Aboriginal archaeological significance	Potentially high*

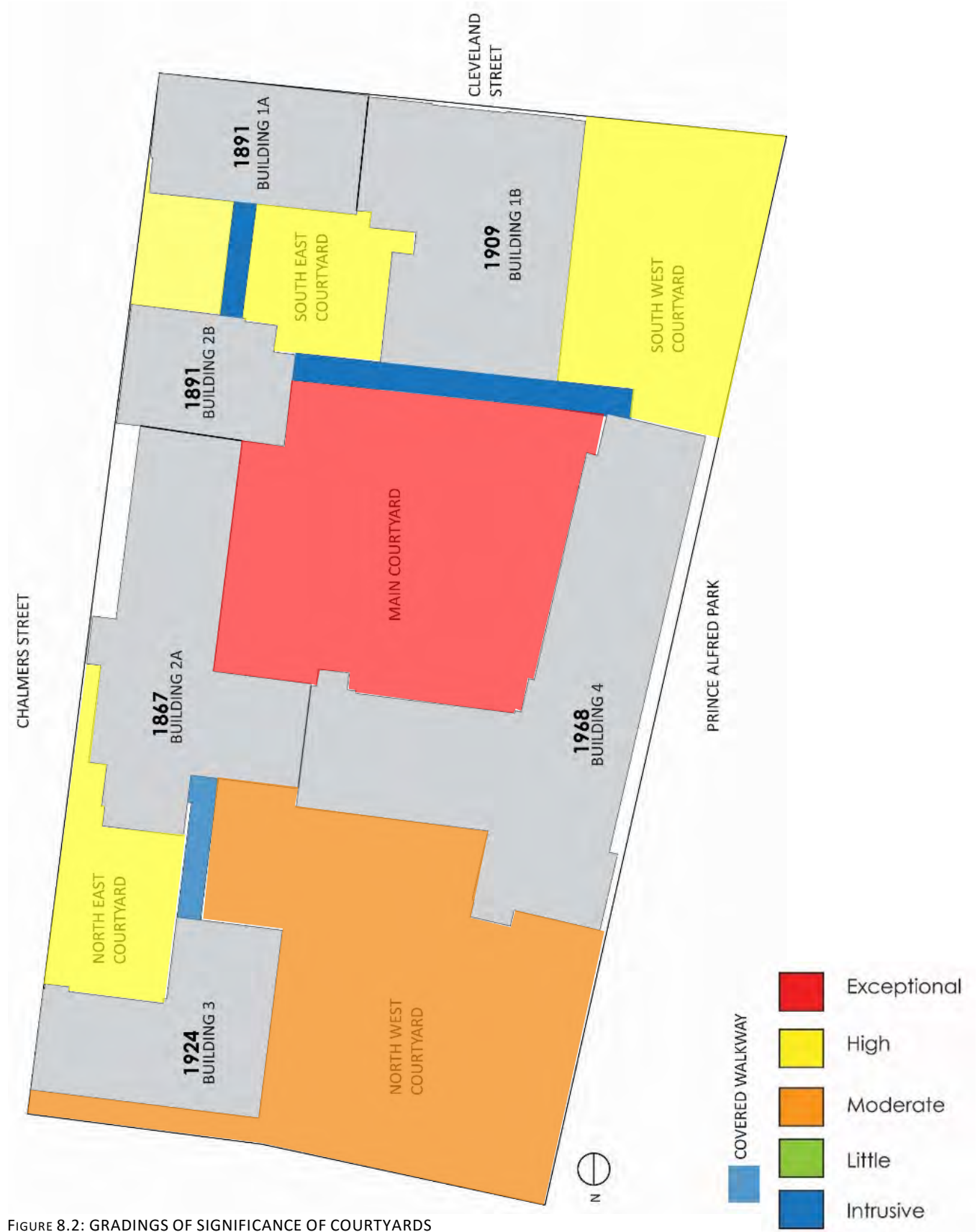
\* To date there has been no significant Aboriginal archaeological evidence unearthed at the former Cleveland Street Public School. However, an assessment prepared by Comber Consultants has indicated the site has the potential to yield evidence of pre-contact and contact Aboriginal occupation of the site that could be considered of State heritage significance due to its social, historic and rarity value.

\*\* The Moreton Bay fig trees (2/No. in south west courtyard and 1/No. in north west courtyard) and Queensland Kauri pine tree (north west courtyard) have a long term historic association with the site and can be seen as sizeable trees in 1943 and 1949 aerial imagery of the site (refer Figure 2.23). The London plane trees and eucalypt within the main courtyard were all introduced to the site subsequent to this date, most likely following redevelopment of the site with the construction of Building 4 in 1968.





FIGURE 8.1: GRADINGS OF SIGNIFICANCE OF BUILDINGS



## 9 CONSTRAINTS AND OPPORTUNITIES

This section outlines major matters involved in the preparation of conservation guidelines for the former Cleveland Street Public School (CSPS) site at 244 Cleveland Street, Surry Hills. It considers issues arising from the significance of the place, its physical condition as well as the constraints arising from heritage conservation methodology, such as the Australia ICOMOS Burra Charter. It identifies the statutory and non-statutory heritage listings for the site and other statutory requirements and describes constraints and opportunities arising from them, such as the requirements of the National Construction Code of Australia.

### 9.1 Implications of Heritage Significance

As described in the Statement of Cultural Significance, the former Cleveland Street Public School has historic, aesthetic and technical significance at a state level, and social significance at a local level. It is of representative value and is rare at the State level. The significance of the place is best demonstrated when the place is actively used and interpreted. Its use will preferably be for educational purposes. Buildings 1, 2 and 3 should be retained and conserved. This includes retention and continued use of the basement areas of buildings 1 and 2, and the primary facades and associated brick and stone details, patterns of openings, roof form and elements of Buildings 1, 2 and 3. However, there is greater opportunity to either adapt or replace building 4 due to its lesser cultural significance. The early surrounding stone retaining walls, piers and iron palisade fencing should be retained and conserved, as should mature trees.

The site and the buildings have through time grown and evolved in response to changing educational and local requirements, and can sustain some further change. Some open spaces should be retained with visual and physical connections to the adjacent streetscapes and parkland.

### 9.2 Implications of the Physical Fabric

#### 9.2.1 Use of the Place

Buildings and sites are often best conserved if they are used for the purpose for which they were built. Although the site has undergone various changes, it is still used for its original purpose. While there are constraints relating to the use of the property based on the significance of the historical phases of use and the physical constraints of the fabric, it is characteristic that since its use as an educational facility, regular changes have been implemented to the internal layout. Any future adaptations to upgrade the premises or facilitate a change of use would need to be undertaken in such a way so as to minimise impact on significant internal fabric, spatial layout and configurations.

Much of the aesthetic significance of the school is embodied in the primary façade of Building 2 (1867) fronting Chalmers Street and the primary façade of Building 1 (1891 and 1909) fronting Cleveland Street. There is scope for alterations and additions within the site, however any new development on the site should be subject to appropriate controls determined through conservation consultation to guide the planning and design.

Any works to the existing buildings and any proposal for new development should be undertaken with consideration for the whole site and its surrounding context. The use of the site, works to the building complex and any new development on site should be compatible with the site history and its associations. Regardless of any potential future changes at the site, there will be an ongoing need to provide resources to undertake conservation and maintenance work.

## 9.2.2 Condition and Intactness of Built Fabric

Externally, the original form of the former CSPS has essentially been retained. Overall, the external fabric is in good condition, however there are opportunities to undertake conservation works to provide for the protection of the building fabric, for example spalling stonework and brickwork. Internally, the original planning has been modified to facilitate the educational requirements over the years, however the internal fabric is typically in good condition.

## 9.3 Owner's Requirements

The rapid population growth that has occurred and is forecast to continue in and around the Sydney CBD will put significant pressure on education infrastructure. The Department of Education has a legislative responsibility to provide teaching spaces to meet demand in all areas across NSW. Due to the limited availability of land in high density areas, the Department is seeking to redevelop and expand the former Cleveland Street Public School site, currently occupied by the Cleveland Street Intensive English High School.

The former Cleveland Street Public School is owned and managed by the Department of Education, who are responsible for the ongoing management and maintenance of the building in addition to ensuring that its operations are economically viable. The Department of Education is therefore faced with the challenge of achieving heritage objectives and the (at times competing) objective for financial return on and best use of its assets. Adaptation of heritage assets is an important consideration in an economic sense, however the uses and physical changes that result must be compatible with the heritage significance of individual places and their settings. These factors are inevitably in tension and there is a need to strike a balance between achieving optimum financial returns to the Government and protecting the heritage values of the assets that realise the financial returns.

While ongoing use and management by a government agency is desirable, it is noted that changes in Government requirements, unforeseen at this time, can lead to changes in the management structure. In the event of divestment of the property by the Government, including establishment of a long term lease, the property would still need to be maintained in accordance with its significance. The aspects of heritage significance, including the building, its elements, uses and associations, must continue to be afforded protection by appropriate statutory planning mechanisms into the future.

## 9.4 Heritage Management Framework

The key statutory controls that apply to the site are:

- Heritage Act, 1977 (NSW) (current version 11 January 2013)
- Sydney Local Environmental Plan 2012 (SLEP 2012);
- Sydney Development Control Plan 2012 (SDCP 2012)

### 9.4.1 NSW Heritage Act (1977)

#### Archaeology

The Heritage Act affords automatic statutory protection to relics that form part of archaeological deposits. The Act defines a "relic" as *'any artefact, object or material evidence which relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement, and which is of State or local heritage significance.'*

Sections 139-145 of the Act prevents the excavation or disturbance of land for the purpose of discovering, exposing or moving a relic, except in accordance with an excavation permit issued by the Heritage Council of NSW.

The archaeological potential of the Former Cleveland Street Public School site and its neighbouring site have been addressed in Section 5 of this CMP and further in the attached archaeological assessment prepared by Casey and Lowe (2016) and the attached Aboriginal archaeological assessment prepared by Comber Consultants (2016).

### Section 170 Register

Under Section 170 of the Heritage Act, each government agency is required to establish and keep a *Heritage and Conservation Register* that details each item of the environmental heritage the agency owns or occupies. The Section 170 Register for the NSW Department of Education is not yet online. Officers from the NSW Heritage Division have advised that their library holds a hard copy of a document titled *Heritage and conservation policy and procedures: Department of School Education*, prepared by Department of School Education in 1992 which may contain information about the Section 170 Register relating to education heritage assets.<sup>211</sup> The Heritage Division is currently in the process of relocating their office, however, and library material is not available for review at present. Regardless, it is considered that the former CSPS at 244 Cleveland Street, Surry Hills would be included on the relevant S170 Register that should be maintained by the now NSW Department of Education.

If an agency intends to undertake any of the following actions regarding items listed on their Section 170 Register, they must give the NSW Heritage Council 14 days' notice:

- removal of an item from the Section 170 Register
- transfer of Ownership
- ceasing to occupy an item currently on the Register
- demolishing an item

Government agencies are obliged to ensure that heritage items on their registers are maintained with due diligence in accordance with *State Owned Heritage Management Principles* approved by the Minister, and with heritage asset management guidelines issued by the Heritage Council: <http://www.environment.nsw.gov.au/resources/heritagebranch/heritage/stateagencyheritageguide.pdf>.

The current *Guidelines for the Preparation of Section 170 Registers*, issued by the Heritage Council of NSW, recommend that proposals involving alteration, disposal or demolition (in part or in whole) of items of state significance be referred to the Heritage Council through the Heritage Division. It is noted, however, that the former Cleveland Street Public School has not been assessed to be of state significance.

### 9.4.2 Sydney Local Environmental Plan 2012

The primary planning instrument applying to the site is the *Sydney LEP 2012* (SLEP 2012) and the City of Sydney Council is the determining authority for any development application for work on the

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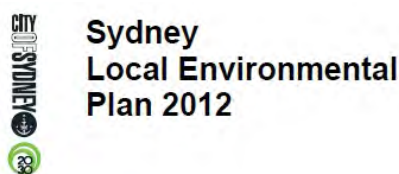
<sup>211</sup> Pers. Comm with NSW Heritage Division, 8 April 2016.



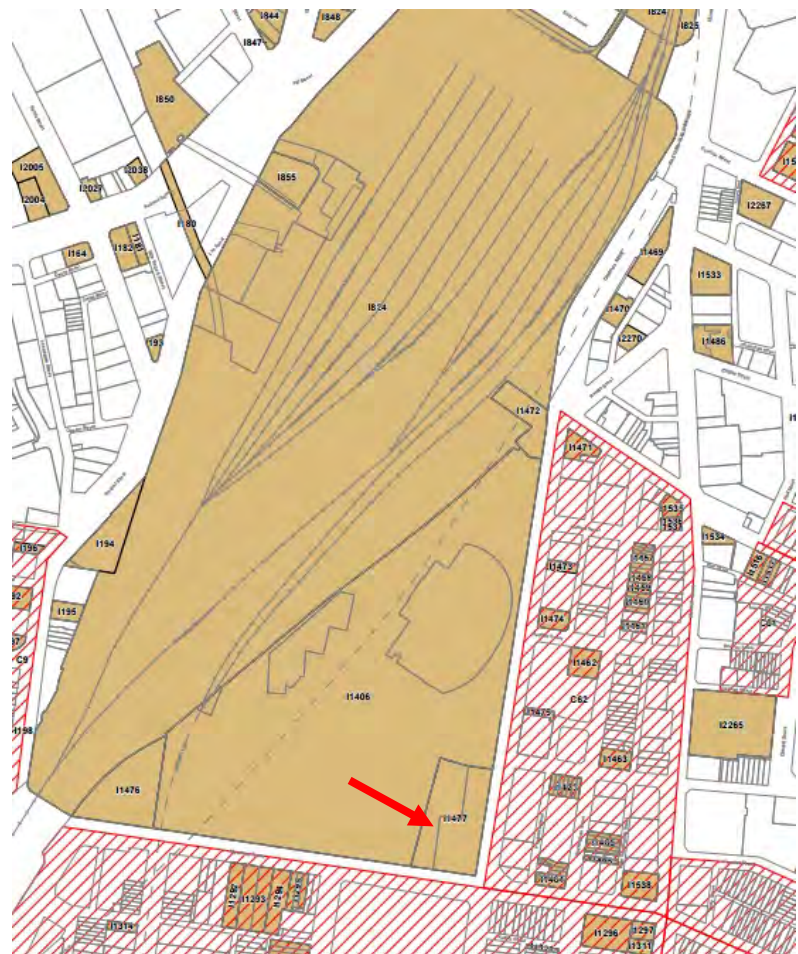
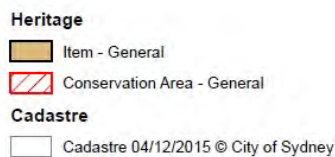
building. Under SLEP 2012, the former CSPS site is currently zoned B4 Mixed Use. The objectives for this zone are as follows:

- To provide a mixture of compatible land uses.
- To integrate suitable business, office, residential, retail and other development in accessible locations so as to maximise public transport patronage and encourage walking and cycling.
- To ensure uses support the viability of centres.

The site is listed as an item of environmental heritage, local significance, in Schedule 5 of SLEP 2012 (Item No. I 1477). The listing applies to the whole site as shown on the heritage map in SLEP 2012. The site is not located within a heritage conservation area however is part of the Prince Alfred Park East Special Character Area (9.4.3.1). The site is located within the immediate vicinity of a number of other statutory listed heritage items, heritage conservation areas and the Prince Alfred Park East Special Character Area.



Heritage Map - Sheet HER\_016



objectives of SLEP 2012 for heritage are to conserve the environmental heritage of the City of Sydney and to conserve the significance of heritage items, including associated fabric, settings and views.

#### **9.4.2.1 Design Excellence (Clause 6.21)**

The requirements for design excellence are detailed in Clause 6.21 of SLEP 2012 and apply to any potential redevelopment of the former CSPS owing to Clause 7.20 of SLEP 2012, which states:

*Development consent must not be granted to development to which this clause applies on the following land unless a development control plan that provides for the matters in subclause (4) has been prepared for the land:*

*(a) land in Central Sydney, if the site area for the development is more than 1,500 square metres or if the development will result in a building with a height greater than 55 metres above ground level (existing),*

As the former CSPS site is in Central Sydney and its area exceeds 1,500 sqm, any redevelopment on the site must be preceded by preparation of a site specific DCP as per Clause 7.20 or alternatively a Stage 1 development application that addresses the requirements of both SLEP 2012 Clause 7.20 and Clause 6.21. Under subclause (4)(iii) of Clause 6.21, heritage issues and streetscape constraints will be considered in the assessment of a proposed development to which Clause 6.21 applies.

#### **9.4.3 Sydney Development Control Plan 2012**

Sydney Development Control Plan 2012 (SDCP 2012) has been made in accordance with Section 74C of the Environmental Planning & Assessment Act 1979 (the Act) and applies to land where the City of Sydney is the consent authority. The purpose of SDCP 2012 is to provide more detailed provisions to guide development.

Some of the aims of this document are to:

- encourage development to respond to its context and be compatible with the existing built environment and public domain;
- recognise and reinforce the distinctive characteristics of the City of Sydney's neighbourhoods and centres.

The overall objectives for heritage of SDCP 2012 are as follows:

*(a) Ensure that heritage significance is considered for heritage items, development within heritage conservation areas, and development affecting archaeological sites and places of Aboriginal heritage significance.*

*(b) Enhance the character and heritage significance of heritage items and heritage conservation areas and ensure that infill development is designed to respond positively to the heritage character of adjoining and nearby buildings and features of the public domain.*

General guiding principles for development, including public domain, sustainability, heritage, design excellence, tree management, transport and parking, late night trading and signage are detailed in Section 3 of SDCP 2012.

#### **9.4.3.1 Prince Alfred Park East Special Character Area**

Section 2 of SDCP 2012 *Locality Statements* establishes provisions for Special Character Areas (SCA) within the City of Sydney. The whole of the former CSPS site is located within the Prince Alfred Park

SCA and the site may be considered as a positive element that contributes to the character of the area. SDCP 2012 provides the following character statement for the Prince Alfred Park East Special Character Area (SDCP 2012, Section 2.11.8):

*This locality is bounded by the railway land to the west, Cleveland Street to the south, and the rear of lots fronting Elizabeth Street to the east. The neighbourhood has legible edges, framed by Prince Alfred Park to the west and Central Station to the north.*

*The area is to continue to develop as a mixed use neighbourhood, with a mix of retail and commercial uses at street level and residential uses above. The diversity of the existing built form is to be maintained and complemented by future development.*

*Existing pockets of consistent character are to be maintained such as the warehouse buildings along the edge of Prince Alfred Park, the low scale Devonshire Street neighbourhood centre and the rows of heritage terraces in Buckingham Street. These are to remain consistent, contributing to the unique character of the neighbourhood while allowing and benefiting from change and redevelopment in the surrounding area.*

*Street level retail and commercial uses are to contribute to the future character of Elizabeth Street consolidating its role as a busy commercial connector linking Cleveland Street and Central Station.*

## Prince Alfred Park East

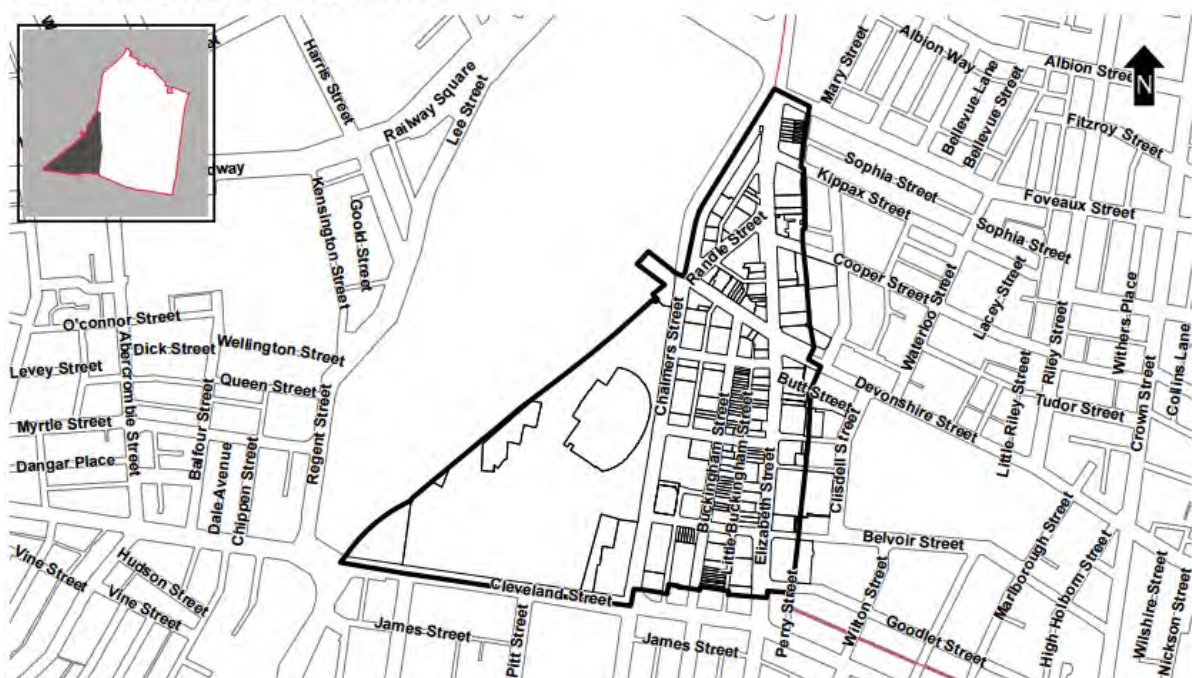


FIGURE 9.2 PRINCE ALFRED PARK EAST SPECIAL CHARACTER AREA.

SOURCE: SYDNEY DEVELOPMENT CONTROL PLAN 2012

The following principles apply to development within the Prince Alfred Park East Special Character Area (SDCP 2012, Section 2.11.8):

- (a) Development must achieve and satisfy the outcomes expressed in the character statement and supporting principles.
- (b) Development is to respond to and complement heritage items and contributory buildings within heritage conservation areas, including streetscapes and lanes.

- (c) Retain street corridor views along east-west streets to significant parkland and the mature trees of Prince Alfred Park.*
- (d) Maintain the Dental Hospital as a landmark building.*
- (e) Maintain Buckingham Street's asymmetry created by taller warehouse/infill buildings on the western side and predominantly low scale terraces on the eastern side.*
- (f) Encourage Cleveland Street Intensive English Centre School, the Greek Orthodox Church and St. Andrews Theological College and Preschool with frontages that address Prince Alfred Park. Alterations to buildings are to address their heritage significance and impact on the park.*
- (g) Maintain the visual relationship of Cleveland House and Prince Alfred Park, and also from Cleveland House to surrounding open spaces and streets.*
- (h) Retain the existing street setbacks and alignment in response to the original street grid pattern of the area.*
- (i) Consolidate active retail uses along Devonshire Street and Elizabeth Street north.*
- (j) Encourage secondary and supporting commercial uses throughout the neighbourhood.*

#### **9.4.4 NSW Government Total Asset Management Process**

Heritage assets form part of the NSW government's resources to be managed under its Total Asset Management (TAM) process, within the NSW Government Planning Framework. The NSW Government Asset Management Committee (GAMC) maintains a Total Asset Management Manual, first released by the government in 1993, and most recently updated in August 2003.

[http://www.treasury.nsw.gov.au/data/assets/pdf\\_file/0015/5109/tam\\_manual.pdf](http://www.treasury.nsw.gov.au/data/assets/pdf_file/0015/5109/tam_manual.pdf)

Total Asset Management (TAM) is a strategic approach to physical asset planning and management, whereby an agency aligns its 10-year asset planning with its service delivery priorities and strategies, within the limits of resources available. As part of the assessment and decision tools in the TAM process, the NSW Treasury has produced a Heritage Asset Management Guideline (September 2004, TAM04-9). This document gives guidance to government agencies on the integration of heritage into Asset Management at all levels from the strategic level through to routine maintenance, including identification of the assets, strategic planning, detailed planning, implementation and monitoring.

The Guideline advises that sustainable management of heritage items should be treated by an agency as part of its core business. It also points out that problems and costs attributed to the use of heritage buildings are mostly due to backlog maintenance and past neglect rather than poor performance of the asset.

[http://www.treasury.nsw.gov.au/data/assets/pdf\\_file/0004/5098/heritage\\_asset.pdf](http://www.treasury.nsw.gov.au/data/assets/pdf_file/0004/5098/heritage_asset.pdf)

### **9.5 Non-Statutory Heritage Listings and Community Groups**

#### **9.5.1 The National Trust of Australia (NSW)**

The National Trust of Australia is a non-government community based organisation, established in 1945, and incorporated by an Act of Parliament in 1960, dedicated to the conservation of Australia's heritage.



Although the National Trust has no statutory power it has a strong influence based on community support, particularly with regard to a possible threat to a structure or place from insensitive development or the destruction of items of cultural or natural heritage significance. The National Trust monitors development applications and makes submissions when the development is considered to have a detrimental impact on the heritage significance of an item, streetscape or conservation area.

The *former* CSPA building complex at 244 Cleveland Street, Surry Hills, has been included on the National Trust Register.

### 9.5.2 Australian Heritage Database

The Register of the National Estate was originally established under the Australian Heritage Commission Act 1975. Under that Act, the Australian Heritage Commission entered more than 13,000 places in the register, including sites, places and landscapes with either Aboriginal or historic heritage values. The former CSPA site at 244 Cleveland Street, Surry Hills has been included in the Register of the National Estate, which indicates the high cultural values of the place.

The Register of the National Estate (RNE) was closed in 2007 and is no longer a statutory list. The RNE is maintained as part of the current Australian Heritage Database (AHD) on a non-statutory basis as a publicly available archive and educational resource. As such, the former CSPA buildings maintain a non-statutory listing on the AHD.

The AHD is now maintained by the Commonwealth Department of the Environment and the Australian Heritage Council is the principal adviser to the Australian Government on heritage matters. The Council assesses nominations for the National Heritage List, and the Commonwealth Heritage List. The former CSPA buildings at 244 Cleveland Street are not listed on either the World Heritage List, National Heritage List or Commonwealth Heritage List under the Australian Heritage Council Act 2003.

## 9.6 NATIONAL CONSTRUCTION CODE OF AUSTRALIA & ACCESS REQUIREMENTS

The National Construction Code (NCC), incorporating the Building Code of Australia (BCA), is a national set of building regulations with some state-specific variations. The performance requirements of the BCA are mandatory, although the introductory sections of the Code make clear that not all requirements will apply to a given case. The Code also includes 'deemed-to-satisfy' requirements which are accepted as meeting the performance requirements. However, the Code also makes provision for alternative solutions to meet the performance requirements, subject to satisfactory verification.

Under the *Environmental Planning and Assessment (EP&A) Regulation 2000*, all new building work must be carried out in accordance with the Building Code of Australia. In the case of an existing building, there is generally no requirement to comply with the BCA unless works are being carried out. However, where works (in particular alterations or additions) are proposed to the place, the building will need to comply on completion with the relevant [performance] requirements of the Building Code of Australia (EP&A Regulation Clause 145). In addition, where an existing building has a change of use, the structural capacity and fire safety of the building must be appropriate for the new use, while for a building which undergoes alterations without a change of use, the structural capacity and fire safety of the building must not be reduced by the work (EP&A Regulation Clause 143).



In certain circumstances, exemption can be obtained from the requirements of the BCA under Clause 187 of the EP&A Regulation. In most cases there will be an acceptable alternative solution to satisfy the performance requirements of the BCA, therefore applications for exemption are sought comparatively rarely. If such an application is contemplated, it should be sought at development application stage.

## 9.7 Disability Access Requirements

Access to premises for people with disabilities, as well as being covered by the Building Code of Australia, is also controlled by the Commonwealth Disability Discrimination Act (DDA) 1992. Compliance with the BCA does not necessarily signify compliance with the DDA, the operation of which is triggered by a complaint lodged with the Australian Human Rights Commission. In 2010 the Commonwealth published the Disability (Access to Premises - Buildings) Standards, compliance with which is intended to meet the requirements of the Act.

Heritage buildings are not exempt from the requirements of the DDA. The preparation of an action plan for access assists in preventing or defending a complaint under the Act. A defence of unjustifiable hardship is also available, and the Australian Human Rights Commission has advised that heritage significance may be taken into account when considering unjustifiable hardship. In NSW, the Building Professionals Board has established an Access Advisory Committee to consider referred applications for exemptions to the Premises Code on the basis of unjustifiable hardship.

The Disability Discrimination Act (1992) makes it illegal to discriminate on the basis of a person's disability. The Act applies to buildings that are expected to be used by the general public.

## 9.8 APPLICATION OF THE BURRA CHARTER

The Australia ICOMOS Burra Charter 2013, known as The Burra Charter, is widely accepted in Australia as the underlying methodology by which all works to sites and buildings, which have been identified as having national, state and regional significance are undertaken.

Because the former CSPS site has identified cultural significance, procedures for managing changes and activities at the site should be in accordance with the recognised conservation methodology of the Burra Charter.

### PRINCIPLES OF THE BURRA CHARTER

In dealing with the fabric, the conservation principles of The Burra Charter should be adopted. The relevant principles are established in the Articles of The Burra Charter as follows:

#### Cautious Approach (Article 3)

All conservation work should be based on a respect for the original fabric, should involve the minimum interference to the existing fabric and should not distort the evidence provided by the fabric.

#### Location (Article 9)

A building or work should remain in its historical location.

#### Contents (Article 10)

Contents, fixtures and objects contributing to the cultural significance of a place should be retained at that place.

#### Change (Article 15)

The contribution of all periods to the place must be respected, unless what is removed is of slight cultural significance and the fabric which is to be revealed is of much greater cultural significance.

Removed significant fabric should be reinstated when circumstances permit.

**Adaptation (Article 21)**

Adaptation is acceptable where it does not substantially detract from the cultural significance of the place and involves the minimal change to significant fabric.

**New Work (Article 22)**

New work may be acceptable where it does not distort or obscure the significance.

New work should be readily identifiable as such on close inspection.

**Use and Conserving Use (Article 7 and Article 23)**

Where the use of a place is of cultural significance it should be retained and a place should have a compatible use.

Modifying or reinstating a significant use may be appropriate and a preferred form of conservation.

**Managing Change (Article 27)**

Existing fabric, use, associations and meaning should be recorded before disturbance occurs.

**Disturbance of Fabric (Article 28)**

Minimal disturbance of fabric may occur in order to provide evidence needed for the making of decisions on the conservation of the place.

**Responsibility for Decisions (Article 29)**

The decision-making procedure and individuals responsible for policy decisions should be identified.

**Direction, Supervision and Implementation (Article 30)**

Appropriate direction and supervision should be maintained at all stages of the work.

**Records (Article 32)**

A record should be kept of new evidence and future decisions and made publicly available.

**Removed Fabric (Article 33)**

Removed significant fabric should be catalogued and protected in accordance with its cultural significance. Where possible it should be stored on site.

The Burra Charter notes that all aspects of cultural significance should be respected. If a place includes fabric, uses, associations or meanings of different periods or different aspects of cultural significance, then emphasising or interpreting one period or aspect at the expense of another can only be justified if that removed or diminished is of slight cultural significance, and that which is interpreted is of much greater cultural significance.

In adopting the conservation principles of the Burra Charter, the overall architectural design should be considered of paramount importance.

## 10 CONSERVATION POLICIES

### INTRODUCTION

This section contains Conservation Policies which should be applied to the site. The overarching aim of the policies and guidelines are to assist with the conservation and management of these sites as well as managing change in ways that will best retain and protect the heritage values of the place. The conservation policies provide a set of guidelines to inform the ongoing conservation of the place and also to ensure that any proposed future works to the former Cleveland Street Public School site, its buildings, structures and spaces, are undertaken in a manner that will respect its cultural significance.

The conservation policies are intended to assist and guide site owners, site managers, consultants, contractors and occupants through the processes of conserving, repairing, maintaining and using the site. The conservation policies provide a set of guidelines to inform future decisions. Decisions about future work, including repair, conservation, maintenance works or future additions and development, should take into consideration the significance of the place as a whole as well as that of the affected separate parts and their interrelationship. The conservation policies are intended to manage change, rather than prohibit it.

The policies are prefaced by a background outlining the reasoning behind each policy and where relevant are followed by strategies and guidelines.

### 10.1 Best Practice Heritage Management

#### Background, Opportunities & Challenges

As a government agency and current owner of this heritage listed site, the Department of Education are obliged to manage the place in accordance with State Owned Heritage Management Principles <http://www.environment.nsw.gov.au/resources/heritagebranch/heritage/stateagencyheritageguide.pdf>. Similar management obligations should be maintained in the future in the event that government ownership ceases. The overall site and elements of the former Cleveland Street Public School are assessed as being of local significance and are worthy of protection by the Department of Education (DoE) and any future owners and managers, in accordance with current best practice.

The significance of the place is expressed in its physical fabric, including its relatively intact external fabric, and also changes made to facilitate the long-term occupation for use as a school, which have been ongoing since its inception. The significance of the place is also expressed in its intangible sense of place, its meanings and associations as a mid nineteenth century educational facility.

Given the long association of the site with the Department of Education, much of the physical evidence of the educational function has been retained, with numerous alterations and modifications taking place over the decades. It is important that all significant fabric is appropriately conserved and managed in accordance with recognised conservation methodology. The Australia ICOMOS Charter for the Conservation of Places of Cultural Significance (The Burra Charter 2013) has been widely accepted across Australia as the underlying methodology by which all works to heritage buildings and sites are undertaken.

The long term conservation of the site requires the implementation of both management and conservation strategies to provide for the retention of its cultural significance. The aims and policies of this CMP should be disseminated through and implemented by the owner of the site and the impact of any proposed modifications or redevelopment should be adequately assessed prior to granting development consent.

**Policy 1. - Retention of Significance**

***The Statement of Significance provided in this CMP for the former Cleveland Street Public School (CSPS) site should be adopted as the basis for its heritage management. All decisions should consider and seek to retain the values identified in this Statement of Significance.***

**Strategies/Guidelines**

The Conservation Management Plan has endeavoured to identify why the former Cleveland Street Public School (CSPS) site as a whole and its major elements are significant. The statement of cultural significance, the significance assessment of individual elements within the building site and the conservation policies should be used to guide future planning work and development.

- Conservation of the place should recognise the site's layered history of development and the relative contribution of all development phases to the significance of the site.
- Prepare Statements of Heritage Impact when changes are proposed to the use or fabric of the place to assess the impact of work in the context of its identified cultural significance.

**Policy 2. - Best Conservation Practice**

***Ensure conservation, maintenance and any development of the site and its components (including moveable objects) are undertaken in accordance with current conservation and planning methodologies.***

**Strategies/Guidelines**

- Refer to the Australia ICOMOS Charter for the Conservation of Places of Cultural Significance Burra Charter 2013. Ensure the conservation of the place, using all the processes for care of the place including maintenance, preservation, restoration, adaptation and interpretation to retain the cultural significance embodied in the fabric, use and associations.
- Change may be necessary to retain cultural significance, but it is undesirable where it reduces cultural significance. The amount of change to a place and its use should be guided by the cultural significance of the place and its appropriate interpretation (Burra Charter Article 15.1).

It may be appropriate to change a place where this reflects a change in cultural meanings or practices at the place, but the significance of the place should always be respected.

- The significant fabric of the former Cleveland Street Public School building site should be conserved in accordance with its identified level of significance (refer Section 8), including implementation of changes to facilitate viable compatible use where relevant.

**Policy 3. - Management of the Site**

***Establish clear responsibility for the management and care of the place and its individual elements, set out the management structure and articulate it to all persons involved as relevant.***

**Policy 4. - Heritage Management Structure**

*The owners/managers responsible for the former CSPS site should implement a heritage management structure that:*

- *provides for the long term conservation of the significant fabric of the site;*
- *integrates heritage conservation and future change with the overall management of the site;*
- *disseminates the intention, aims and policies of this Conservation Management Plan to all those responsible for the maintenance and development of the site; and*
- *outlines the responsibility at each staff level and of any permanent or temporary tenants.*

**Strategies/Guidelines**

Conservation management should be pursued as a regular and ongoing responsibility to promote a balance between proposed site functions and the conservation of cultural significance. The management structure for the site should address:

- integration of conservation in the overall management of the site by providing for long-term effective and consistent conservation of significant buildings and structures on the site;
- disseminating the aims and intentions of this CMP to appropriate officers and outlining the responsibilities to relevant parties for its implementation;
- maintaining the integrity of the character of the site;
- understanding the balance between proposed site functions and the conservation of cultural significance;
- assessing the impact of any proposal on the identified heritage significance of the place.

**Policy 5. - This Conservation Management Plan**

*This Conservation Management Plan should be formally adopted by the owners/managers of the former CSPS site to provide a basis for its future management so that works being considered on site may be undertaken in accordance with its recommendations.*

**Strategies/Guidelines**

- Effective implementation of this plan requires agreement of objectives, processes and actions by the owner in order to give it the necessary influence over matters affecting the cultural significance of the place.
- Apply this Conservation Management Plan during any future works on the former CSPS site. If a Development Application is required for new work, it should address the findings of the CMP.
- Refer to other heritage and asset management documents as relevant. The following documents apply to state-owned heritage assets:
  - Total Asset Management Manual:  
[http://www.treasury.nsw.gov.au/\\_data/assets/pdf\\_file/0015/5109/tam\\_manual.pdf](http://www.treasury.nsw.gov.au/_data/assets/pdf_file/0015/5109/tam_manual.pdf)
  - State-Owned Heritage Management Principles:  
<http://www.environment.nsw.gov.au/resources/heritagebranch/heritage/stateagencyheritageguide.pdf>



**Policy 6. - Access to CMP**

***All parties responsible for management of the former CSPS site should have access to this Conservation Management Plan.***

**Strategies/Guidelines**

The CMP should be made available and distributed to:

- Staff of the Cleveland Street Intensive English High School, that are responsible for day to day management of and planning for the place.
- Future owners and managers, including those of any future secondary comprehensive school currently under consideration.
- City of Sydney Council.

**Policy 7. - CMP Review**

***The Conservation Management Plan should be reviewed and updated, taking into account changes in legislation, new information and proposed changes in use or management beyond as addressed in this CMP.***

**Strategies/Guidelines**

- This CMP should be formally reviewed at intervals not exceeding ten years, unless more frequent reviews are made necessary by proposed changes to the place or to include new information. This review must be done by an experienced heritage consultant.
- Appropriate professional advice should be obtained to assist in reviewing and/or amending specific policies when required.

**10.2 Documenting Change****Background, Opportunities & Challenges**

Archival records as well as the systematic recording of work are valuable resources to support and ensure the proper overall management of heritage sites. They record the environment, aesthetics, technical skills and customs associated with the creation and use of heritage items before they are altered, removed or lost either by development, incremental change or deterioration. Well-managed records enhance the understanding of the heritage item, its significance and the impact of change as part of the conservation and management process.

The reasoning behind the selection of a particular conservation approach, in addition to the methodology and the scope of each major conservation project, should also be recorded and archived so that it can form the basis for future decisions. Recording should be undertaken by a suitably qualified and experienced heritage professional.

There are existing records of the former Cleveland Street Public School, comprising drawings of changes implemented by the former Board of National Education, held in the State Records of New South Wales archives. Ongoing recording should be undertaken and the records, including copies of consultant reports, should be retained. An archival storage repository should be established on site to hold records in a single, logical location.

**Policy 8. - Maintaining Records**

*Continue to acquire, collate, maintain and archive drawings, schedules of works, photos and specifications for any future works and/or changes to the site including the reasoning for particular works. These records should be placed in an archival storage repository that should be established on site.*

**Policy 9. - Recording in Conjunction with Major Work**

*Detailed recording, including photographic record and measured drawings in accordance with NSW Heritage Division guidelines, must be undertaken by a suitably qualified and experienced heritage professional prior to commencement, during and after any major work.*

*Maintain records of as-built drawings following implementation of work.*

**Policy 10. – Recording of Maintenance and Change**

*Undertake detailed recording of the site components, spaces, fabric and features in accordance with NSW Heritage Division guidelines before, during and after any works for maintenance and change to fabric, for example in order to repair the structure or to reveal aspects of the building's significance. Retain the record, and if applicable, retain a sample on site.*

**Strategies/Guidelines**

- Implement photographic recording, before, during and after changes to the heritage fabric.
- All changes to significant fabric must be recorded in accordance with recording guidelines issued by the Heritage Division - How to prepare Archival Records of Heritage Items 1998: <http://www.environment.nsw.gov.au/resources/heritagebranch/heritage/infoarchivalrecords.pdf> and the Photographic Recording of Heritage Items Using Film or Digital Capture 2006: <http://www.environment.nsw.gov.au/resources/heritagebranch/heritage/infophotographicrecording2006.pdf> prepared by the NSW Heritage Division.
- Recording of maintenance and repair works should be undertaken in accordance with The Maintenance Series Information Sheet 1.2 *Documenting maintenance and repair works*, NSW Heritage Office (now NSW Heritage Division): <http://www.environment.nsw.gov.au/resources/heritagebranch/heritage/maintenance12documentingmaint.pdf>
- On completion of future works, copies of as-built records should be provided to the owner by those undertaking the works for inclusion in an on-site storage repository to be established.

**10.3 Skills and Experience****Background, Opportunities & Challenges**

The skills and experience required and creative approaches taken in the context of a conservation project are quite different to those applied to the design and construction of new buildings. The *Burra Charter* encourages the use of skilled and appropriate professional direction and supervision from a range of disciplines for conservation activities.

In planning, design and works for any changes to significant elements and features that are greater than day-to-day maintenance and cleaning, it is important to involve specialists and contractors who

have experience in heritage projects, methods and materials. Expertise should be sought early, rather than after a proposal has been developed. Heritage specialists can assist in application of the policies contained in this CMP and to develop more detailed, proposal-specific heritage conservation strategies. Depending on the nature of the work, heritage expertise can be sought with a heritage architect, archaeologist, heritage landscape specialist, structural engineer and building contractor with previous experience working on heritage sites.

**Policy 11. - Early Advice**

*Ensure that appropriate heritage professionals are involved at an early stage for major works within the CSPS site, including to address relevant heritage opportunities and constraints relating to proposals prior to design work commencing, and ensure their continuing involvement throughout the project.*

**Policy 12. - Appropriate Expertise and Skills**

*Skilled conservation professionals, architects, landscape architects, archaeologists, builders and engineers must be engaged to document, advise on and/or implement conservation and upgrading works and advise on proposals for future conservation and development works at the former CSPS site.*

*Work on significant heritage fabric must be carried out by tradespeople or professionals with demonstrated skills and experience in heritage building work*

**Policy 13. - Traditional Construction**

*For any work on traditionally constructed parts of the building, use traditional methods of construction, maintenance and repair.*

**Policy 14. - Briefing**

*Brief all persons working at the site, including contractors and tradespeople, on the significance of the place and the need for care in undertaking works relating to significant heritage fabric, for example via preparation of a brief custodian document. This information should be provided as part of any site induction.*

**Strategies/Guidelines**

- All conservation work undertaken at the former CSPS site should be in consultation with qualified and experienced conservation architect acting within the guidelines of this CMP.

## **10.4 Ownership, Participation and Approvals**

### **Background, Opportunities & Challenges**

The former CSPS site was traditionally in government ownership and although the ownership corporations have attained altered titles throughout the decades, the government retains ownership of the site, which is currently vested in the Department of Education.

**Policy 15. - Ownership**

*If the site passes from public ownership or its use changes, appropriate heritage covenants and/or a heritage conservation agreement (or other appropriate arrangements) should be placed on land titles where there are identified heritage assets in perpetuity to ensure the adequate maintenance of the heritage assets.*

**Policy 16. - Authority Consultation**

*For major development proposals and for overall site masterplans, incorporate appropriate consultation with authorities during the concept design and design development stages so that any relevant stakeholder concerns can be addressed.*

**Policy 17. – Statutory Approvals**

*Works must not be undertaken to the site, including to individual buildings and elements, at the former CSPS site without the required statutory approvals. It is the responsibility of proponents of work to obtain the relevant approvals prior to undertaking works.*

**Strategies/Guidelines**

- Where public ownership is no longer feasible, responsibility for caring for the heritage values of the site will be passed to the new owner/s. Under the Heritage Act a heritage conservation agreement could be established. A conservation agreement is a joint agreement between landholders and the Minister for the Environment, which provides permanent protection for the special features of a place. The area under the agreement is registered on the title of the land, ensuring that, if the land is sold, the agreement and management requirements remain in place.
- Initial pre-application discussions with relevant consent authorities should be undertaken to determine requirements and nature of approvals for any major development proposals. Consultation with statutory authorities should be ongoing throughout design stages to ensure that stakeholder concerns are adequately addressed.
- Refer to the City of Sydney's Sydney Local Environmental Plan 2012  
<http://www.cityofsydney.nsw.gov.au/development/planning-controls/local-environmental-plans>
- Refer to the City of Sydney's Sydney Development Control Plan 2012  
<http://www.cityofsydney.nsw.gov.au/development/planning-controls/development-control-plans>

**10.5 Setting / Related Places****Background, Opportunities & Challenges**

Much of the significance and character of the building is created by the remarkably intact nineteenth and early-twentieth century building fabric that contributes to the historically and aesthetically important streetscape. The front façade of the original school building is highly visible from Chalmers Street at the east, with the later buildings seen along the south – east corner of Prince Alfred Park and from Cleveland Street at the south.

This CMP acknowledges the potential for future development to occur on the site, accepting that change is inevitable and in many instances desirable given the need for ongoing viable use. Any new

development on the site should be subject to controls to ensure that it is compatible with the important visual and heritage qualities of the site and the surrounding areas.

***Policy 18. – Views to the Building Complex***

***Retain significant identified views to the building complex from surrounding footpaths along Chalmers and Cleveland Streets and views from Prince Alfred Park.***

***As the front elevation of the original 1867 building and associated early additions of the former CSPS are highly visible from the public domain, it is important that no additions are made to the front elevations or roofs of Buildings 1 and 2 along Chalmers Street or Cleveland Street.***

***Policy 19. – Views from the Building Complex***

***Retain significant identified views from the site that are generally available from the main courtyard. Retain the visual connectivity between the main courtyard and the surrounding smaller courtyard within the site, in particular the south east, south west and north west courtyards.***

***Policy 20. – Reinstate Historic View***

***Opportunity should be taken in any future redevelopment of the site to reinstate the historic view that was previously available from the main courtyard to the west towards Prince Alfred Park. It is feasible for this view to be reinstated from the ground level i.e. the courtyard, or alternatively from the building podium level in association with any future new development.***

Construction of Building 4 in 1968 effectively obscured the direct visual relationship that was historically available between the site, in particular from the main courtyard, and Prince Alfred Park. This view previously contributed to the amenity of the site in visually connecting its main playground space to the park. Opportunity should be taken in the future to reinstate this historic visual connection.

***Policy 21. – Courtyard Setting to Existing Buildings***

***The main courtyard and smaller courtyards within the site should be retained in any future redevelopment of the site. No new development should occur in:***

- ***the main courtyard;***
- ***the north east courtyard (between Buildings 2A and 3);***
- ***the south east courtyard (between Buildings 1A and 2B);***
- ***and the south west courtyard (to the west of Building 1B).***

The school site features five courtyards dispersed throughout the site, which provide a visual link to the surrounding buildings. The main central courtyard is highly significant and visually allows open air and light to the surrounding buildings on the site. The main courtyard features visual links to the south east and south west courtyards, including looking north to Prince Alfred Park. The existing courtyards represent the playground areas associated with the use of the site and should be retained in any future redevelopment of the site.

**Policy 22. – North West Courtyard**

***Retain and conserve the north west courtyard. Some new development within this courtyard is feasible provided that it does not prevent opportunities to retain visual connection with Prince Alfred Park.***

The north west courtyard is less defined than other courtyards at the site and some new development in this area is feasible.

**Policy 23. – Related Places**

***Ensure that future development on the former CSPA responds appropriately to the heritage values of the site and the important qualities of the neighbouring heritage areas including Prince Alfred Park.***

**Policy 24.– Setting in Conjunction with Future Development**

***Any future development should be designed and sited to maintain the significant setting and streetscape qualities of the site viewed from Chalmers Street, Cleveland Street and Prince Alfred Park. Any future development should retain an adequate setting to allow interpretation of the significant fabric of the former CSPA.***

**Strategies/Guidelines**

- Retain physical and visual connections with the surrounding context, in particular Prince Alfred Park and undertake opportunities to enhance these connections when opportunities arise.

**10.6 Landscape**

Historically, the landscape area of the former CFSP site was comprised of the outdoor play areas now established as a series of courtyards on the site that facilitate visual connections between spaces both within the site and to the broader setting. While these courtyards are characterised by hard landscaping in the ground surfaces and planter beds, there are several mature trees that contribute to the visual and aesthetic amenity of the site.

Generally, gardening work does not require approval. However, if landscaping works involve more than normal garden works (i.e. paving, garden beds and plantings), and excavation of 500 mm or deeper is required (e.g. for drainage works), then approval from the Heritage Council of NSW is required and an archaeologist may need to be involved with the works.

Trees must not be planted close to the buildings as there is the potential for damage to the foundations.

**Policy 25. – Existing Mature Trees**

***Retain and conserve the existing mature trees for their contribution to the site amenity, including:***

- ***Two Moreton Bay fig trees (south west courtyard);***
- ***Three London plane trees (main courtyard); and***
- ***Moreton bay fig tree and Queensland Kauri pine tree (north west courtyard).***



***Policy 26. – Recent Plantings (North West Courtyard)***

*Removal of more recent plantings within the north west courtyard, including along the western boundary of the site, is acceptable subject to necessary approvals and augmentation of the landscaping in this area subsequent to site redevelopment.*

***Policy 27. – New Landscaping***

*New landscaping is acceptable in conjunction with compatible future use where it is designed to be sympathetic to the cultural significance of the site. A landscape plan should be prepared by landscape architect with experience working on heritage sites to augment site amenity.*

*Soft landscaping may be introduced in conjunction with adaptation of the site and new development where it does not damage significant building fabric (e.g. by the activity of tree roots in close proximity to significant fabric).*

*Any new vegetation must be selected with consideration for the need to retain important identified views.*

***Policy 28. –Substrate Investigation***

*Landscape work should be preceded by an investigation of the substrate and any early features identified. Any significant surviving features are to either be retained and incorporated into the site plan or are to be recorded.*

***Policy 29. – Liaison with Authorities***

*Any proposed landscaping for the site should involve discussions with City of Sydney landscape specialists, in particular in areas that share a boundary with Prince Alfred Park.*

**Strategies/Guidelines**

- The existing mature trees have contribute to the amenity/aesthetic value of the site and they should be retained, in particular the two fig trees in the south west courtyard and the fig and Kauri pine tree in the north west courtyard, which have a long term historic association with the site and have been assessed to have High significance.
- Any landscaping work that disturbs or removes soil and which may result in the disturbance of archaeological resources, such as excavation to lay paving or plant trees, will require approval under Section 140 the *Heritage Act 1977*.

**10.7 Archaeology****Background, Opportunities & Challenges**

The archaeological potential of the school site and its neighbouring site have been addressed in the attached archaeological assessment prepared by Casey and Lowe (2016) and Aboriginal archaeological assessment prepared by Comber Consultants (2016), as summarised in Section 5 of this CMP and attached as Appendices to this CMP.

**Policy 30. – Archaeological Assessment**

*Areas of identified archaeological potential should be managed in accordance with the recommendations of the historical archaeological assessment and the Aboriginal archaeological assessment.*

**Policy 31. – Application for Excavation – Historical Archaeology**

*An application for an excavation permit must be made under Section 140 of the NSW Heritage Act 1977 (NSW) for any archaeological excavation works that may be required based on the findings of the historical archaeological assessment.*

*All ground disturbance associated with any future development of the site should be undertaken in accordance with the proposed archaeological methodology and any conditions of the archaeological approval which may include archaeological monitoring or salvage excavation.*

**Policy 32. – Aboriginal Archaeology**

*Any Aboriginal archaeological evidence should be managed in accordance with the provisions of the National Parks and Wildlife (NPW) Act 1974.*

The Aboriginal archaeological assessment has indicated there may be a high potential for physical evidence of Aboriginal occupation to be present within the site area.

**Policy 33. – Unexpected Finds**

*If relics other than those indicated by archaeological assessment are revealed during excavation works, the Heritage Council must be notified in accordance with Section 146 of the NSW Heritage Act 1977 and a suitably qualified archaeologist should be consulted to assess the significance and research potential of the remains. Depending on the results of the assessment, additional approvals may be required before works can recommence on site.*

**Policy 34. – Underground Services**

*Where underground services are discovered, they should be assessed by suitably qualified professionals to determine whether they are active and their significance prior to disturbance or removal.*

**Policy 35.– Obligations of Contractors**

*Suitable clauses should be included in all contractor and subcontractor contracts to ensure that on-site personnel are aware of their obligations and requirements in relation to the archaeological provisions of the NSW Heritage Act 1977. Contractors' and subcontractors' contracts should also specify obligations which need to be met relating to the National Parks and Wildlife Service Act 1974 relating to Aboriginal 'objects' or relics.*

**Policy 36.– Aboriginal Cultural Heritage Values**

*The significant Aboriginal cultural heritage values must be acknowledged and should be protected through appropriate management and consultation with the Aboriginal community. Aboriginal community consultation should be undertaken in accordance with the Office of Environment and Heritage publication Aboriginal cultural heritage consultation requirements for proponents 2010 prior to any disturbance in the site.*

**Policy 37.– Protection of Objects**

*The management of the former Cleveland Street Public School should ensure protection of any Aboriginal objects recovered within a secure location and utilise information arising from those objects to enhance understanding of Aboriginal cultural values.*

**Strategies/Guidelines**

- Any archaeological artefacts, whether found through archaeological investigation or as a result of site excavation, should be placed in an appropriate repository that should be established on site.
- Avoiding impact on the archaeological resource is best achieved by avoiding ground disturbance. Avoiding in ground impacts can be minimised, for example, by reusing existing service trenches when in ground services are to be renewed or upgraded.

**10.8 Conservation of Significant Fabric and Elements****Background, Opportunities & Challenges**

Article 3 of *The Burra Charter* indicates that conservation is based on a respect for the existing fabric of a place and should therefore involve the least possible physical intervention in order not to distort the evidence provided by the fabric. Maximising the survival of key elements of the historic fabric is therefore important to retain a sense of authenticity and integrity of the site despite the extent of change that has already occurred. The retention of early fabric should be the first preference in any works. While any conservation activity will affect the site and/or its elements in some way, the aim, consistent with responsible re-use or management aims, should be to minimise the work necessary. In this way the authenticity of the place will be retained as far as possible within a process of evolutionary changes that are in fact characteristic of the sites' development.

The existing external building fabric of the Former Cleveland Street Public School (CSPS) is substantially intact, although some maintenance work is required. The intactness of the place is partly owing to the history of maintaining the buildings to a high standard under the long term government ownership of the site, including conservation works implemented during the Department of Education period of occupation of the building. The internal building fabric is also substantially intact, although minor alterations, such as introduction of partitions, have been implemented over time.

The following are general strategies and guidelines outlining principles for any conservation of significant fabric in conjunction with any future works on the site.

**Policy 38. - Character**

*Retain and conserve the Victorian and early twentieth century character of Buildings 1, 2 and 3.*

**Policy 39. - Conservation of Significant Fabric**

***Retain and conserve Buildings 1, 2 and 3, including their robust masonry character and overall form.***

***Extant building fabric, both internally and externally should be retained and conserved in accordance with the levels of significance identified in Section 8 Grading of Significance of this CMP and the Room Survey Schedules for Buildings 1, 2 and 3 by OCP Architects, June 2016 (in a separate volume).***

**Policy 40. - Building Fabric Generally**

***Retain and conserve fabric of Exceptional and High significance, including:***

- ***Early wrought iron palisade fencing and stone wall and piers on boundary.***
- ***Face brick facades***
- ***Painted brick and rendered brick masonry walls***
- ***Sandstone and rendered details, including chimneys***
- ***Copper clad bell tower (Building 2A)***
- ***Timber framed windows***
- ***Timber framed paneled and ledged and braced doors***
- ***Significant internal features including blackboards, early built in joinery, fireplaces and their associated elements e.g. mantelpieces.***

***Aim to retain fabric of Moderate significance where possible.***

**Policy 41. - Significant Elements associated with Items**

***All components of identified significant items should be retained in situ and not be removed or relocated, including fireplaces, chimneys and their associated elements.***

There are instances where mantelpieces and other fabric associated with fireplaces have been removed in the past. The elements associated with the fireplaces contribute to the significance of the item and all such remaining elements should be retained in situ.

**Policy 42. - Conservation of Masonry Fabric**

***The stone and brick masonry fabric of Buildings 1, 2 and 3, and stone piers and low wall on the boundary, should be thoroughly investigated by qualified and experienced heritage architects and any necessary repairs should be implemented. Repairs should utilise matching material and be of a high quality commensurate with the significance of the buildings and fabric.***

***Remove self-seeded vegetation from the masonry fabric.***

There is a history at the site of maintaining the buildings to high standards over approximately 150 years of government ownership and this should be continued, in particular with consideration for the maximum safety required in accordance with high level student use of the site.

**Policy 43. - Damp and Desalination of Masonry**

*Buildings 1, 2 and 3 should be thoroughly reviewed for rising damp by a suitable experienced and qualified heritage architect and appropriate remediation measures be implemented as required.*

*Implement desalination of masonry fabric in the medium term to ensure the ongoing conservation of the significant fabric.*

**Policy 44. - Conservation of Timber Fabric**

*Implement repairs and painting maintenance works to Buildings 1, 2 and 3 to ensure the long term protection of significant timber fabric, including windows and doors, including frames, and roof components such as rafters and fascias.*

**Policy 45. - Conservation of Early Boundary Fence**

*Treat early wrought iron palisade fence for rust and implement painting maintenance work in the short term.*

Rusting metal fabric has the potential to damage stonework where connected and this work should be undertaken as soon as possible to avoid significant impacts.

**Policy 46. - Roof Analysis**

*Undertake a hydraulic analysis of the roofs of Buildings 1, 2 and 3 to ensure that the provision of downpipes is adequate.*

**Policy 47. –Building Fabric Condition Survey**

*Prior to implementing any proposals for works to the former CSPS, a detailed assessment of the physical fabric should be undertaken by a suitably qualified and experienced conservation architect to identify the condition of its elements and determine a comprehensive schedule of conservation actions to be implemented in conjunction with works. This policy should be applied to any conservation, maintenance or upgrading works, in addition to new works proposed for the existing significant buildings.*

*Proposals should be developed with regard for the identified level of significance of existing elements as recorded in the Room Survey Schedules prepared for Buildings 1, 2 and 3 (OCP Architects, June 2016).*

**Strategies/Guidelines**

The significant fabric and elements of the site should be conserved.

- Conserve significant existing fabric by repair, reconstruction and preservation. Elements identified as having Exceptional or High significance should be retained, and conserved, preferably in situ. The retention of items of Moderate significance is desirable. Items of Little significance may be retained or removed as required. Intrusive items should, eventually, be removed. The recommended treatment is as shown in Section 8 above.
- Prioritise conservation action according to conservation needs. Address unstable fabric or deterioration which endangers personal safety and significant fabric first.

- Reconstructing elements to a known earlier state, for example removing additions, is acceptable only if it is required for conservation, if it enhances the significance, does not distort existing evidence and allows interpretation of the change.
- If existing significant fabric has to be removed, for example in order to repair the structure, or to reveal aspects of the building's significance, it must be recorded before any intervention is to take place and if applicable, a sample retained on site.

## 10.9 Use

### Background, Opportunities & Challenges

The site has been in ongoing educational use since the original establishment of the school buildings in the mid nineteenth century and the external presentation of the buildings have been maintained for the benefit of the site itself and also as a precinct asset.

The continued use of the site is important for retaining its significance and the ongoing use of the property as an educational facility is preferred. Any potential alternate future use of the site should be compatible with the significance of the place in that it is suited to existing features and allow for an adaptive 'loose fit' that involves minimal intervention to significant fabric.

#### ***Policy 48. - Use of the Buildings and Site***

***Any future uses proposed for the former Cleveland Street Public School must retain or enhance the significance of the place and be compatible with its existing features. The preferred use of the property is education, and the site should retain amenities that support such use. Other supporting educational uses could be conducted after hours or during the school holidays and may include educational short courses or conferences.***

#### ***Policy 49. - Appropriate Future Uses for the former Cleveland Street Public School site.***

***Appropriate future uses should be determined with consideration for the following criteria:***

- *sympathetic to the significance of the site and the configuration of existing building complex;*
- *sympathetic to the character of the place;*
- *sympathetic to established uses within the locality;*
- *utilise traditional entry points and circulation routes;*
- *do not result in unacceptable levels of wear and tear on extant fabric to be retained.*

***The use of the place must be organised in a way that allows the conservation of the significant fabric with consideration for:***

- *the effect of structural loadings and the effect of service installations;*
- *the effect of statutory requirements, including code compliances and meeting access needs.*

### Strategies/Guidelines

A compatible use is one which respects the cultural significance of the place and conserves the significant fabric and spaces and where appropriate recovers significance. The use of the place and its circulation pattern should aim to:

- minimise intervention to the significant fabric on the site;
- minimise impact on the building in terms of requirements for fire safety, access and egress;
- provide economic resources to ensure the long-term maintenance of the significant fabric.



## 10.10 Adaptation / Alterations & Additions

### Background, Opportunities & Challenges

The former Cleveland Street Public School (CSPS) at 244 Cleveland Street, Surry Hills, has modified its educational use over the years and has progressively been comprehensively refurbished and sympathetically repaired by the Department of Education. Throughout these processes, the exterior and interiors of the buildings have been retained substantially intact and in this regard there are limited opportunities for substantial internal alterations. Externally, any original door and window openings that have been bricked up should eventually be reinstated, however, it should be noted that additional new external openings should generally be introduced to the fabric of Buildings 1, 2 and 3. With consideration for their significance, alterations or additions to the front elevation of Building 1 (1891 and 1909) fronting Cleveland Street and Building 2 (1867) fronting Chalmers Street should not occur and there are limited opportunities only for modification of Building 3.

The following strategies and guidelines are designed to assist in managing the significant heritage values of the place, accepting that change is inevitable with most occupied and functioning heritage sites. Proposed changes should always be carefully considered in the context of the significance of the place and the potential for the change to impact on that significance.

#### ***Policy 50. – Understanding Place***

***When undertaking upgrade or adaptive reuse works develop place specific solutions which minimise the heritage impact.***

#### ***Policy 51. – Retention of Significance***

***Any proposal for adaptation, alterations or additions to the Buildings 1, 2 and 3 of the former CSPS should demonstrate that there will be no unacceptable adverse heritage impact on the significant buildings or the site as a whole. The level of change must be derived from an understanding of the relationship of the buildings to the site, their historic use and their cultural significance.***

***Any proposed changes must be designed to retain significant spaces and minimise removal of significant fabric in accordance with the gradings of significance in Section 8 and Room Survey Schedules for Buildings 1, 2 and 3 (undertaken by OCP Architects in 2016 and provided in a separate volume).***

#### ***Policy 52. – Elements of Exceptional Significance***

***Elements of Exceptional significance are rare or outstanding elements that directly contribute to the place's overall heritage significance. These elements should not be obstructed by new works, structures or services and they should be clearly visible and interpreted as part of any new works. Where elements of Exceptional significance have been damaged they should be repaired with sympathetic materials in preference to replacement.***

**Policy 53. – Elements of High Significance**

*Elements of High significance have a high degree of original fabric and demonstrate key aspects of the place's overall heritage significance. These elements should not be obstructed by new works, structures or services and they should be clearly visible and interpreted as part of any new works. Where elements of High significance have been damaged they should be repaired with sympathetic materials in preference to replacement.*

**Policy 54. – Elements of Moderate Significance**

*Elements of Moderate significance have been altered or modified or do not demonstrate the key aspect of the significance of the place however they contribute to the place's overall heritage significance. Minor change is acceptable so long as it does not adversely affect values and fabric of Exceptional or High significance.*

**Policy 55. – Elements of Little Significance**

*Elements of Little significance do not substantially add to the significance of the place in a positive way, neither do they detract from its overall significance. Elements of little significance may have been substantially altered or modified or may reflect non-significant phases of development. Changes are acceptable so long as they do not adversely affect values and fabric of Exceptional, High or Moderate significance.*

**Policy 56. – Intrusive Fabric**

*Opportunities should be taken to remove fabric that has been identified as being Intrusive as this fabric detracts from the heritage significance of the place.*

**Policy 57. – Changes to Fabric**

*Where change or removal of fabric is necessary, for example to facilitate repair, maintenance or introduction of a compatible use, it should preferably be undertaken to fabric of Moderate or less significance. Removal of significant fabric should only occur where it allows for conservation of fabric of greater cultural significance or is essential for conservation of the place as a whole.*

**Policy 58. – Additions to Buildings 1, 2 and 3**

*Construction of new additions to the building envelopes of Buildings 1, 2 and 3 are not recommended in general. The existing external building forms should be conserved.*

*There should be no additions to the upper floors of Buildings 1-3 that will adversely affect the prominence of the school in views to the site from Chalmers Street, Cleveland Street or from Prince Alfred Park or the presentation of the building generally.*

**Policy 59. –Alterations to Elevations**

***Significant window and external door openings should be preserved. New window or door openings on the Buildings 1, 2 and 3 should be avoided and are not permitted on street facing elevations.***

***Minor alteration of the elevations of Buildings 1, 2 and 3 is possible where it regains their cultural significance, in particular former openings that have been infilled should be reinstated when opportunity arises.***

**Policy 60. – New Reconstruction Work**

***New reconstruction work should be distinguishable from existing fabric on close inspection. New work should not be visually dominant over adjacent significant fabric.***

**Policy 61. – New Work to be Reversible**

***New internal fitout work should be designed and detailed so that it is reversible and can be removed without adverse heritage impact on significant fabric.***

**Strategies/Guidelines**

- Generally, proposed changes that impact on heritage significance should only be considered if:
  - They allow for the recovery of areas or elements of greater significance;
  - Care is taken to minimise the adverse effect on heritage significance and effort is made to negate the impact and enhance significance in some other way;
  - The change helps to maintain the use, security/protection of the significant buildings/elements.
- New work should be guided by the gradings of significance (refer Section 8), with new work generally localised in areas of less significance.
- Significant window and door openings should be preserved.

**10.11 New Development**

This CMP recognises that there are opportunities to undertake new development on the site provided that it is carefully sited so that it will complement the cultural significance of the site. In this regard, redevelopment opportunities are limited to the western edge of the site, in the area currently occupied by Building 4. Sensitive redevelopment on the site may be appropriate to ensure its ongoing viability.

Building 4, the last building constructed on the site in 1968, has Little significance; it does not make a substantial contribution to the streetscape and is aesthetically inferior to the Victorian buildings fronting Chalmers Street and Cleveland Street and other heritage buildings in the vicinity of the site. As such, it may be possible to provide a vertical extension to this building and to incorporate it into any redevelopment. Alternatively, the removal of this building and replacement with a well-designed modern building is considered to be acceptable. Any new development on the site should be subject to appropriate controls to be developed in consultation with a suitably qualified and experienced heritage architect.

**Policy 62. – Approach to Site**

*Consider the site as a whole when planning future works, including the site, open space areas, buildings, extant structures and site elements. Locate new building/s in areas of lower significance at the rear of the site where Building 4 is currently situated.*

**Policy 63. – Planning Approach**

*The siting of new building/s and their bulk and scale should retain significant views and vistas within the site and the locality.*

**Policy 64. – Collaboration**

*New design and heritage conservation teams should work together from initial stages through design concepts, design development and construction.*

**Policy 65. – Protection of Significant Landscape Features**

*An arborist should be engaged to prepare a report and recommendations to ensure the protection of significant landscape features, both within the site and also the adjacent Prince Alfred Park as relevant, in association with any proposed redevelopment of the site.*

**Policy 66. – Redevelopment in the Area of Building 4**

*There are opportunities to redevelop Building 4 or alternatively to replace this building with new development. Any new development must respect the cultural significance of the site and be subject to rigorous design, planning and conservation consultation.*

**Policy 67. – Protection of Building 2A**

*Any proposal to remove Building 4 must not result in any irreversible damage to the significant fabric of the adjacent Building 2A and must be carried out in a carefully controlled, systematic manner so as to not compromise or undermine the adjacent heritage building. The following principles should be applied:*

- Large scale demolition using machinery or wrecking ball within the vicinity of heritage fabric or structure is not permitted;*
- Any demolition or excavation work within close proximity to the foundations of Building 2, e.g. footings, abutting walls, is to be carefully undertaken, by hand where necessary;*
- Demolition must be carried out by specialist construction personnel, with experience working with heritage fabric.*

**Policy 68. – New Development to be Complementary to Existing Significant Fabric**

*Where new development is in close proximity or adjacent to existing significant building fabric, an appropriate dialogue must be established between the modern and heritage fabric via high quality architectural detailing that respects the significant heritage qualities of the existing buildings.*

The west façade of the wing of Building 2A has been altered to facilitate internal connections to Building 4. It is anticipated that in association with future development, this connectivity between old and new will be retained to facilitate practical operation of the school. Any new connections to the existing fabric of Building 2A associated with redevelopment of the site must demonstrate an appropriate relationship to the existing fabric and minimise further intervention to this fabric.

**Policy 69. – Height of New Development**

*New development proposed to exceed the height of the existing heritage buildings on the site should adopt a distinct ‘podium and tower typology’ that responds to the scale of the existing buildings, with the podium distinguished by materiality e.g. horizontal articulation and/or design e.g. set back above podium.*

*New development proposed to exceed the height of the existing heritage buildings on the site should adopt a neutral aesthetic above the existing established height, or alternatively be of ‘lighter’ character, to allow the character of the existing buildings to remain prominent.*

The historic buildings are three storey in scale with masonry walls providing a strong visual baseline. Any new development should respect this through implementation of strategies in accordance with the above policy.

**Policy 70. – Design Details of New Development**

*New development should be designed with consideration for the existing heritage buildings in terms of siting and envelope, scale, details, materials, colours and finishes.*

**Policy 71. – Façade Treatment**

*New development should be designed with consideration for its presentation to Prince Alfred Park, in addition to its presentation internally within the site and to the locality in general.*

**Policy 72. – Circulation Links between Buildings**

*The existing covered walkways circulation and access between the existing buildings are intrusive to the quality of the courtyards and should be removed when the opportunity arises. Any new covered ways should be minimal in appearance and should be of a high quality design including materiality; and where possible, should be freestanding, effecting minimal contact with and damage to the abutting surfaces of significant buildings.*

**Strategies/Guidelines**

- Any new future development should be designed so as to enhance appreciation of the cultural significance of the place. There is greater scope for changes to be made to Building 4, which is of Little significance, than to Buildings 1, 2 and 3.
- Any new built form should complement existing development on the site to be retained. A smart and contemporary aesthetic that denotes new work as such is appropriate.
- New development and design details should complement the character and scale of the existing buildings and be recognisable as new work.

## 10.12 Sustainability

### Background, Opportunities & Challenges

Conserving heritage places is one of the highest forms of sustainability, as reusing heritage buildings helps reduce greenhouse gas emissions by reducing the embodied energy needed to produce new building materials, as well as significantly reducing construction waste and the reprocessing of construction waste. Many older buildings are inherently energy efficient when they are used in the way they were designed to perform.

There are a range of policies that address sustainability for government assets, including the Guidelines for Sustainable Development in the Total Asset Management Manual and the NSW Government Resource Efficiency Policy (State of NSW and Office of Environment & Heritage, 2014). The policies aim to achieve climate change targets through:

- increased energy efficiency and reduced energy consumption;
- sourcing a portion of energy from non-fossil fuels;
- the fossil-derived energy being sourced from green energy tariffs and/or offsets through accredited providers.

Reducing energy consumption should not affect the heritage significance of heritage items. Modifying heritage buildings may occur to achieve appropriate energy conservation outcomes, however a balance between reducing energy use and greenhouse gas emissions and conserving the state's heritage must be achieved.

In maintaining and protecting the cultural significance of the former Cleveland Street Public School (CSPS), a desirable goal is to provide improved tenant (staff & students) amenity through improved air quality, comfort levels and natural light, in ways that support heritage considerations.

#### ***Policy 73. – Sustainable Measures***

***All applications for alterations to the existing buildings on site and for new development should demonstrate measures which work toward the objectives of the government policies for sustainability.***

### 10.12.1 Air Modification Systems

Ideally, within the existing Buildings 1, 2 and 3, thermal comfort should be provided by passive systems utilising the inherent properties of the building. The early buildings on the site feature ceiling/roof ventilation systems as an inherent design feature that contributes to the significance of the fabric. It is noted, however, that ceiling fans have been introduced within a majority of spaces, excluding circulation areas, and some spaces already accommodate air conditioning, including a ducted system within parts of Buildings 1 and 2 and some wall mounted units in Building 3 that are intrusive.

It is acknowledged that air conditioning may be required to facilitate ongoing use of the existing heritage buildings and that existing systems may need to be replaced in the future. Any air conditioning proposed for the Buildings 1, 2 and 3 should be developed with an appropriately qualified air conditioning consultant, preferably with previous experience working on heritage buildings, in consultation with a heritage architect.



**Policy 74. – Air Modification Systems**

*The design of air modification systems deemed to be necessary within Buildings 1, 2 and 3 should be designed to minimise impact to the significant fabric and visual impact. A tailored air conditioning system developed from first principles in consultation with a heritage architect should be developed to ensure that any impacts are minimal.*

*Any air conditioning system associated with new development on the site should be designed to minimise any visual impact on the presentation of the site and its elements.*

**Strategies/Guidelines**

- Identify the factors contributing to thermal discomfort prior to developing any solutions.
- Investigate and implement sustainable and passive solutions and measure their effectiveness before installing any new mechanical solutions.

**10.13 Building Code Compliance****Background, Opportunities & Challenges**

The National Construction Code (NCC, incorporating the BCA – The Building Code of Australia) has been adopted by planning and building legislation in NSW as the technical standard for design, construction and operation of buildings. The Building Code of Australia permits alternatives to its deemed-to-satisfy requirements provided that these can be demonstrated to achieve at least the same level of compliance with its performance requirements.

In many cases, the existing buildings of the former CSPS may not comply with the deemed-to-satisfy requirements because of the original construction methods and materials used. In terms of ongoing use, and possible changes to the existing buildings, compliance with building regulations may incur loss of heritage significance.

Buildings 1, 2 and 3 should not be used for any purpose for which compliance with building regulations will have an unreasonable impact on their significance. Policies are not intended to rule out, for example, the sympathetic installation of fire safety equipment or facilities to satisfy access and egress requirements; rather they highlight the need to achieve a balance between intervention to facilitate ongoing use of the place and protection of significance.

**Policy 75. – BCA Compliance and Use**

*The buildings on the former CSPS site should not be used for any purpose for which building code compliance will require an unreasonable level of change to significant spaces or fabric. Compliance with building regulations should not unduly affect the heritage significance of the place.*

**Policy 76. – Compliance with Building Code of Australia (BCA)**

*Compliance with building regulations should be achieved using their objectives and performance requirements rather than deemed-to-satisfy provisions, where deemed to satisfy requirements in the BCA cannot be met without adverse heritage impact on the former CSPS. Any proposed changes will require relevant approvals.*

**Policy 77. – Existing Stairs in Buildings 1, 2 and 3**

*Retain original and early stairs within Buildings 1, 2 and 3 that contribute to their significance.*

**Strategies/Guidelines**

- Where the BCA deemed-to-satisfy requirements will result in adverse heritage impacts on the building use the alternative objectives and performance requirements instead.
- Consult The Fire, Access and Services Advisory Panel of the Heritage Council of NSW when proposals may have an impact on significant fabric and/or spaces.
- Refer Room Survey Schedules for Buildings 1, 2 and 3 for assessment of existing stairs (undertaken by OCP Architects in 2016 and provided in a separate volume).

**10.14 Accessibility****Background, Opportunities & Challenges**

The *Commonwealth Disability Discrimination Act 1992* (DDA 1992) makes it unlawful to discriminate against people on the grounds of their disability. Section 23 of the DDA 1992 requires independent access to be provided to premises which the public or a section of the public is entitled or allowed to use, with the exception of some residential buildings.

Heritage places are not exempt from the DDA 1992 and it would apply to the former CSPA, however the Act is flexible enough to provide scope for consultation between relevant authorities over conflicts between access needs and heritage significance. The Australian Human Rights Commission has advised that heritage significance may be taken into account when considering whether providing equitable access would result in unjustifiable hardship.

***Policy 78. – Equitable access***

***Equitable access should be provided to the publicly accessible areas of the former CSPA and the site generally in a manner that does not unduly affect the heritage significance of the place. Major intervention to the existing significant building fabric should be minimised.***

***Policy 79. – Stair and Lifts***

***No new lifts or stairs are permitted within Buildings 1, 2 and 3 and where required should be provided externally.***

***Where new vertical and horizontal access and/or circulation is required, the location should be determined by access consultants, to ensure the proposed circulation design for access is compliant, working in consultation with an experienced heritage architect, to ensure that the heritage significance of the existing buildings are not unduly affected.***

**10.15 Maintenance and Repair of Existing Buildings and Elements****Background, Opportunities & Challenges**

Regular maintenance and repair is an important factor in the conservation process. Scientific and physical investigation is required to assess the condition of the fabric and to determine appropriate conservation methods that should be documented.

***Policy 80. - Continuing Maintenance***

***Conserve significant fabric of the place by preservation, stabilisation and continuing maintenance. Significant assets identified in this CMP should be integrated into asset routine / major periodic maintenance planning programs.***

**Policy 81. - Maintenance Plan**

*A detailed Maintenance Plan for the interior and exterior of Buildings 1, 2 and 3 should be prepared for the significant elements of the site to provide a basis for regular maintenance and repair. The Maintenance Plan should be prepared by an experienced heritage architect, skilled heritage builder and a Quantity Surveyor.*

**Policy 82. - Approach to Maintenance**

*Maintenance of fabric must be undertaken in accordance with the following:*

- Regular inspections and maintenance must be carried out by persons with demonstrated skills and experience in heritage building work and with an understanding of the heritage value of the former CSPA site.*
- Repair elements in need of urgent attention.*
- Repair as required, rather than replace, significant fabric disturbed during maintenance works. It is better to retain and patch/repair existing fabric if it can function in situ, rather than replicate original material.*
- Repair fabric with compatible materials, for example repair masonry joints with lime mortar.*
- Do not apply anti-graffiti or water repellent coatings unless researched and recommended by a suitably qualified and experienced heritage architect.*

**Policy 83. – Urgent Works**

*Carry out urgent works that are necessary to ensure the conservation of significant fabric whenever they are identified, for example preventing water ingress.*

**Policy 84. – Funding Maintenance**

*The owners of the site should commit adequate and ongoing financial resources to provide for corrective maintenance as required and for long-term preventative maintenance of the heritage assets. Allocated funds should be put into a sinking fund over the next 10-20 years in preparation for future maintenance works.*

**Policy 85. – Hazardous Materials**

*Assess hazardous materials and heritage issues at the beginning of the planning stage of any intended new maintenance or repair work. Seek advice of appropriately qualified professionals, including an experienced heritage architect, prior to undertaking any work involving intervention to hazardous materials in areas of significant fabric.*

**Strategies/Guidelines**

- Conserve the building (in the short-term) where required by stabilising deterioration, including making watertight, structurally stable etc.
- Conserve the building (in the longer-term) by continuing maintenance, the single most important process of conservation.

## 10.16 Painting of Existing Buildings and Elements

### Background, Opportunities & Challenges

Regular painting forms an essential part of maintenance for a number of building materials, especially timberwork, and can extend their service life. The need to undertake painting maintenance work on the site also applies to rendered walls and ceilings, including areas of damaged and flaking paintwork. Appropriate investigations and remedial action should be undertaken prior to any repainting works (refer Section 10.8).

#### ***Policy 86. – Colour Schemes***

***When selecting a paint color scheme for extant building fabric, it should be based upon documentary and physical evidence of past paint schemes or otherwise on a historically appropriate paint colour scheme. Selection of an appropriate colour scheme for significant fabric should be carried out by a suitably qualified heritage specialist.***

#### ***Policy 87. – Existing Paint Layers***

***New painting should generally be undertaken without disturbing the existing paint layers, unless these layers are loose, flaking or blistering. Use traditionally appropriate methods and materials as advised by a suitably qualified heritage specialist.***

#### ***Policy 88. – Unpainted Surfaces***

***Existing surfaces originally intended to be left unpainted should remain unpainted. This includes external stonework and brickwork.***

### Strategies/Guidelines

- When undertaking cyclic painting works to Buildings 1, 2 and 3, seek to introduce historically appropriate colour schemes for significant fabric and spaces.

## 10.17 New Services

### Background, Opportunities & Challenges

It is recognised that services and safety features may need to be updated in heritage buildings. In the case of the former CSPA, the building services have been upgraded progressively as required, which has resulted in an array of surface mounted services fixed to ceilings and walls. A holistic upgrade of services is likely to be required in the future, which may be viewed as an opportunity to rationalise the installation/presentation of services within the significant buildings on the site.

Upgrading of services can benefit the building if they facilitate removal of earlier intrusive services and replacement by less intrusive systems. Although service and access upgrades may seem fairly straightforward, they can have negative heritage impacts if they are not sensitively planned and installed. In addition to the recommendations below, the NSW Heritage Council has a Fire, Access and Services Advisory Panel (FASAP) that can provide advice on specific proposals. They can also provide suggestions about the latest performance based solutions, which can minimise heritage impacts.

**Policy 89. – Redundant and Intrusive Services**

*Remove redundant or intrusive service runs in the medium to long term, including surface mounted services, without damaging or removing significant fabric.*

**Policy 90. – Planning New services**

*Plan the introduction of new services in detail in conjunction with a suitably qualified and experienced heritage architect before installation, so that potential impacts can be avoided.*

**Policy 91. – New Services**

*New services must be installed inconspicuously to cause least damage to the fabric, and grouped together to minimise impacts. Any new penetrations through heritage fabric for supply and waste pipes and mechanical ducts must be minimised. To minimise impact and loss of original fabric, the replacement of services should aim to use existing service routes where these are concealed.*

**Policy 92. – Minimise Visual Impact of New services**

*Externally mounted air-conditioning, ventilation equipment, water heaters or service components must not be visible from Chalmers or Cleveland Streets or impact negatively on the external presentation of the significant buildings.*

**Policy 93. – Future-proofing for Additional Services**

*Any upgrade strategy prepared for services within the buildings on site should include provisions for future upgrades that may be required to minimise impacts associated with additional service needs in the future.*

**Strategies/Guidelines**

- Include an assessment of the impact of new services in heritage impact statements for works to the existing significant buildings. Ensure that upgrading of services:
  - minimises impact on significant fabric;
  - locates services in concealed areas designed for, or previously utilised for, services;
  - are complementary to their surroundings.

**10.18 Interpretation****Background, Opportunities & Challenges**

Interpretation is an essential part of the conservation process. The Burra Charter advises that the cultural significance of many places is not readily apparent, and should be explained by interpretation. Interpretation should enhance understanding and enjoyment, and be culturally appropriate. Interpretation includes all the ways of presenting the cultural significance of the place and may include an array of techniques and media from treating the fabric (repair and conservation work), presenting explanatory material on and off the site and organising activities.

The history of the site and the heritage values that make the place significant are worth interpreting to visitors and the general public. Understanding the significance of the site will depend on the interpretation strategies that are adopted to address all of the significant phases of use.

The site offers opportunities to interpret its history both in conserving fabric, in on-site interpretation and moveable heritage elements which could incorporate relational information about the site in graphic and written form.

***Policy 94. – Interpretation Strategy***

***An Interpretation Strategy for the former CSPS site should be prepared. The Interpretation Strategy should address all phases of the site's use, including the Aboriginal significance of the site as informed through Aboriginal community consultation and archaeological investigation.***

***A developed Interpretation Plan based on the Interpretation Strategy should then be implemented.***

***Policy 95.– Interpretation of Aboriginal Significance***

***The interpretation of the Aboriginal heritage significance of the place should be integrated into the planning for the use of the site's open spaces and/or within introduced structures.***

***Policy 96.– Interpretation of Aboriginal Archaeological Objects***

***The interpretation of Aboriginal archaeological objects or sites should be respectful of the cultural knowledge imparted during Aboriginal consultation and should be responsive to the expressed wishes of that community.***

***Policy 97. – Interpretation of Educational Use of the Site***

***The Interpretation Plan should interpret the history and significance of the site as a whole, its layout, its use as well as present the human face of any stories associated with the site. The place should be interpreted as a major educational facility that has continued to provide an educational function throughout its historic period of use.***

***Policy 98. – Historical Associations***

***Interpret the connection of the site with Prince Alfred Park and its relationship to Cleveland and Chalmers Streets.***

***Policy 99. – Funding***

***Obtain and allocate necessary funding for interpretation. There should be an ongoing commitment to make financial resources available for the interpretation of the site.***

***Policy 100. – Public Access***

***Public access to interpretive elements on the site should be provided when opportunity arises, for example on heritage open days.***



It is acknowledged that public access to the site is limited given the necessary security requirements associated with its operation. Opportunities to facilitate public access to the interpretive elements should be undertaken and interpretive elements should be located with consideration for this.

### Strategies/Guidelines

- Measures to appropriately interpret the major aspects of the significance of the place should be incorporated into the conservation and development proposals for the site as a whole. The presentation of interpretive elements should be incorporated into the proposed new development of the site, creating a relationship between the existing and new development. This should be included as part of any brief for a design competition for site redevelopment.
- The distinct phases of development of the site should be interpreted. The historical development of the place is demonstrated through the physical development of the site.
- Methods of interpretation include conservation and display of original features and fabric, reconstructing missing or damaged elements based on documentary and/or archaeological evidence, introducing interpretative devices such as discrete labelling, the use of historic photographs, preserving evidence of original finishes and fabric (e.g. a cleaned patch of original wall colour) and allowing access for specialist study and/or presentation in publications.
- Revealing previously hidden elements and fabric and defining new fabric and elements used as part of reconstruction and adaptation as recommended in the Burra Charter and policies of this report are associated methods of interpretation.
- Preservation, restoration and reconstruction of key significant elements, areas and fabric are the preferred method of meaningfully interpreting important attributes and associations. Where adaptation is part of the conservation work, measures should be incorporated to show the location, character and/or role of removed or altered elements where appropriate.
- Any future Interpretation Strategy for the site should accord with the guidelines set out in the NSW Heritage Office publication *Interpreting Heritage Places and Items Guidelines* which was endorsed by the Heritage Council of NSW in August 2005.

## 10.19 Moveable Heritage

### Background, Opportunities & Challenges

Items of moveable heritage are integral elements that contribute to the significance of a place. The Burra Charter refers to moveable heritage as 'contents' and states:

*Article 10. Contents*

*Contents, fixtures and objects which contribute to the cultural significance of a place should be retained at that place. Their removal is unacceptable unless it is: the sole means of ensuring their security and preservation; on a temporary basis for treatment or exhibition; for cultural reasons; for health and safety; or to protect the place. Such contents, fixtures and objects should be returned where circumstances permit and it is culturally appropriate.*

The former Cleveland Street Public School contains items of moveable heritage that have been assessed to be of local significance based on their association with the site. The retention of items of moveable heritage contributes to the understanding and interpretation of a place and transfer or removal of the items from their current setting within the school would diminish their significance.

The following policies have been developed as part of the moveable heritage management recommendations:

***Policy 101. – Access to Moveable Heritage***

***Moveable heritage items that contribute to the interpretation of the school and its personnel should be displayed and interpreted in ways that make both the items and the knowledge they impart accessible within the limits of security required for operation of the site.***

***Interpretation of the moveable heritage should be developed and integrated into the site and buildings as part of any conditions of consent for any future redevelopment.***

Public access to items of moveable heritage and interpretation thereof for research and education should occur when opportunity arises, for example on heritage open days.

***Policy 102. – Ownership***

***All moveable heritage items within the former CSPA site should be retained under single ownership/custodianship in association with the school itself. In the event that there is a change in the ownership/custodianship of the former CSPA, all moveable heritage items should become the property and responsibility of the new site owner/custodian.***

***Policy 103. – Retention in-situ***

***Moveable heritage items identified in this CMP should preferably be retained on site and in situ. Fixed items, including original built-in wardrobes and blackboards, should remain in their existing locations. ‘Moveable’ items associated with significant elements, including mantelpieces associated with fireplaces, should be retained in-situ and not be removed.***

***Where it is not feasible to retain moveable items in situ, these should be relocated within the site or stored in a secure location on site where it is not possible to display items.***

**Strategies/Guidelines**

The removal of movable heritage items from their existing locations should be avoided unless it is:

- the sole means of ensuring their security and preservation;
- on a temporary basis for treatment or exhibition;
- for cultural reasons;
- for health and safety;
- to protect the heritage asset.

No items of moveable heritage should be disposed of. Any items which require relocation for the above reasons should be returned to their original locations where circumstances permit, and where it is culturally appropriate to do so. Thorough documentation should be undertaken to assist in establishing the provenance, context, and associations to people and to place. It will also aid later reinstatement.

**Policy 104. – Reinstatement**

*Where possible and appropriate, moveable heritage items should be reinstated to their original location and context. This should be done based on historical research and in consultation with a suitably qualified heritage consultant. If the original context/location of an item is not known, then the item is to be relocated to an appropriate and secure location on-site.*

**Policy 105. – Documentation**

*Moveable heritage items should be appropriately documented and recorded.*

**Strategies/Guidelines**

An archival recording of the moveable heritage items should be prepared to ensure that moveable heritage items have been recorded, documented and photographed in their existing locations. Further documentation should be prepared in the event of any proposed relocation of items of moveable heritage.

Any archival documentation should be placed in the public domain in a permanent archive, such as the City of Sydney archives and/or State Records of NSW, for the benefit of historians, researchers and the public.

**Policy 106. – Identification**

*Moveable heritage items should be retained within the former CSPS site and identified via attached signage. This is particularly important for any items that are not fixed to any surfaces.*

**Policy 107. – Future Use**

*Moveable heritage items, particularly furniture, should continue to be used in accordance with their original function. Any use that is unsympathetic, causes excessive wear or has a negative impact and/or is inconsistent with their heritage values should be avoided.*

*Any future change to the use of the school and school buildings should consider the significance of the items and ensure that provision is made for the continuing sympathetic use of items (particularly furniture) in situ and consistent with their heritage significance.*

**Policy 108. – Management**

*A management strategy for the care and protection of moveable heritage items at the school should be prepared. Controls will be required which include regular inspection, management regimes for care and upkeep by suitably qualified professionals.*

**Strategies/Guidelines**

Should circumstances change which impact on the future management of these items, including a change in ownership of/responsibility for the school or a change of use, assessment and strategies will be required to ensure that their heritage values of moveable items are not diminished or compromised. The protection and long term preservation of these items should be prioritised.

## **11 Annexures**

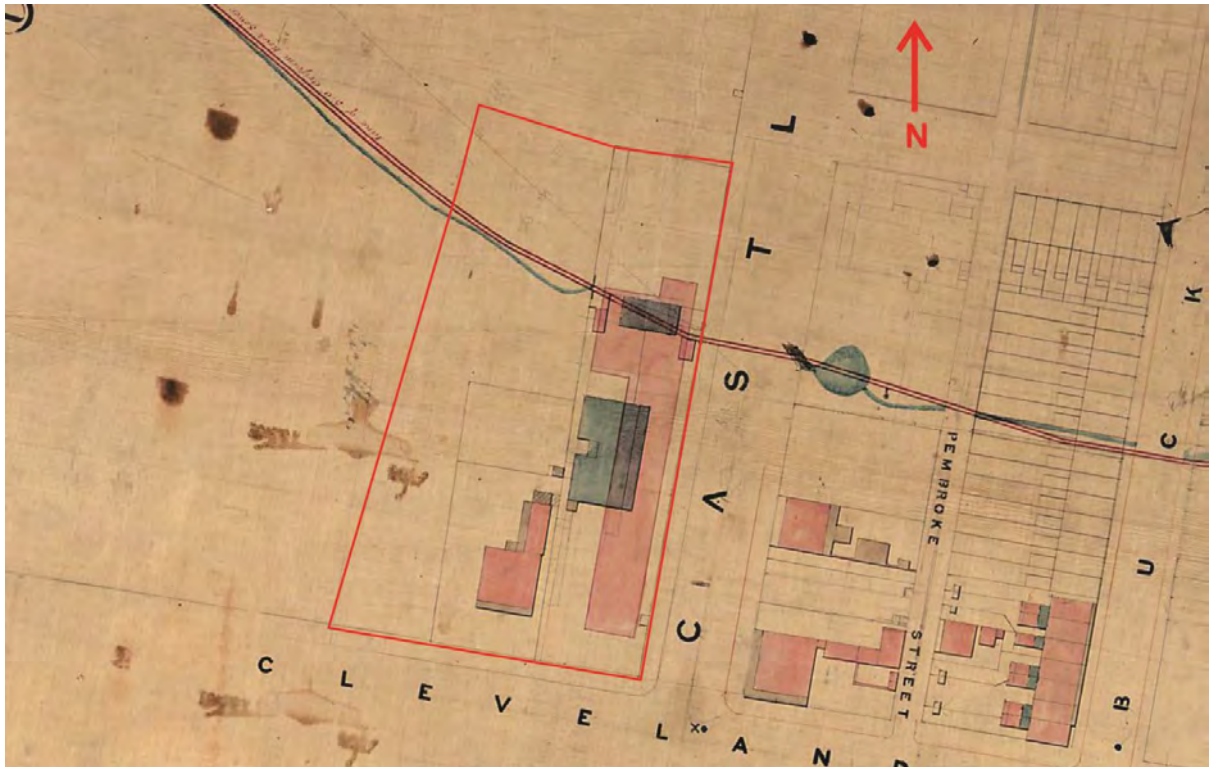
**Archaeological Assessment, 244 Cleveland Street, Surry Hills (Casey + Lowe, 2016)**

**Aboriginal Archaeological Assessment, 244 Cleveland Street, Surry Hills (Comber Consultants, 2016)**

# Archaeological Assessment

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## 244 Cleveland Street, Surry Hills



*Detail of c.1865 plan with the study area outlined in red. Trigonometrical Survey, Section S, Historical Atlas of Sydney, City of Sydney Archives.*

Report to



**OCP Architects**

on behalf of

**The Department of Education**

**July 2016**

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## EXECUTIVE SUMMARY

This report assesses the potential impacts on historical archaeological remains during the redevelopment of the Cleveland Street Intensive English High School site into a 1,200 or 1,500 place comprehensive secondary school.

## RESULTS

The study area, 244 Cleveland Street, Surry Hills has been assessed as containing the following potential archaeological features:

- Foundations of the original 1855 school building and associated structures
- Foundations of the c.1855 Wesleyan parsonage and associated structures
- A c.1865 brick oviform drain and earlier creek line.
- Evidence for other unrecorded structures associated with the school, parsonage and park
- Artefact deposits including rubbish pits and backfilled cesspits associated with the school, parsonage and park
- Evidence for landscaping, clearance and gardening activities associated with the school, parsonage and park

These potential archaeological features have been assessed as being of local heritage significance because of their research potential and their association with the standing locally significant school buildings.

The construction of the proposed building and excavation of four lift pits will have a substantial impact on the potential archaeological resource, however most of these impacts will occur in areas assessed as having only low or low to moderate archaeological potential. Impacts to areas of moderate potential are also possible during landscaping and gardening works.

## RECOMMENDATIONS

1. The proposed design indicates there is a small possibility that archaeological remains of potential local heritage significance will be impacted during construction works. In order to mitigate this impact, archaeological monitoring is recommended.
2. A program of archaeological monitoring needs to be undertaken by an appropriately qualified archaeologist, as outlined in Section 6.0.
3. A report presenting the results of the archaeological program and artefact catalogue will be a condition of consent and will be prepared at the end of the archaeological program.
4. Any archaeological program needs to be reported on in accordance with Heritage Council guidelines.
5. Any artefacts collected and retained during the works will need to be catalogued and then securely stored by the client after the completion of the archaeological program.



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**Document Status**

<b>Name</b>	<b>Date</b>	<b>Purpose</b>	<b>Author</b>	<b>Approved</b>
Draft 1	6/7/16	internal review	Sandra Kuiters	Tony Lowe
Draft 2	11/7/16	Issue to client for review	Sandra Kuiters	Tony Lowe

# Archaeological Assessment 244 Cleveland Street, Surry Hills

## 1.0 Introduction

### 1.1 Background

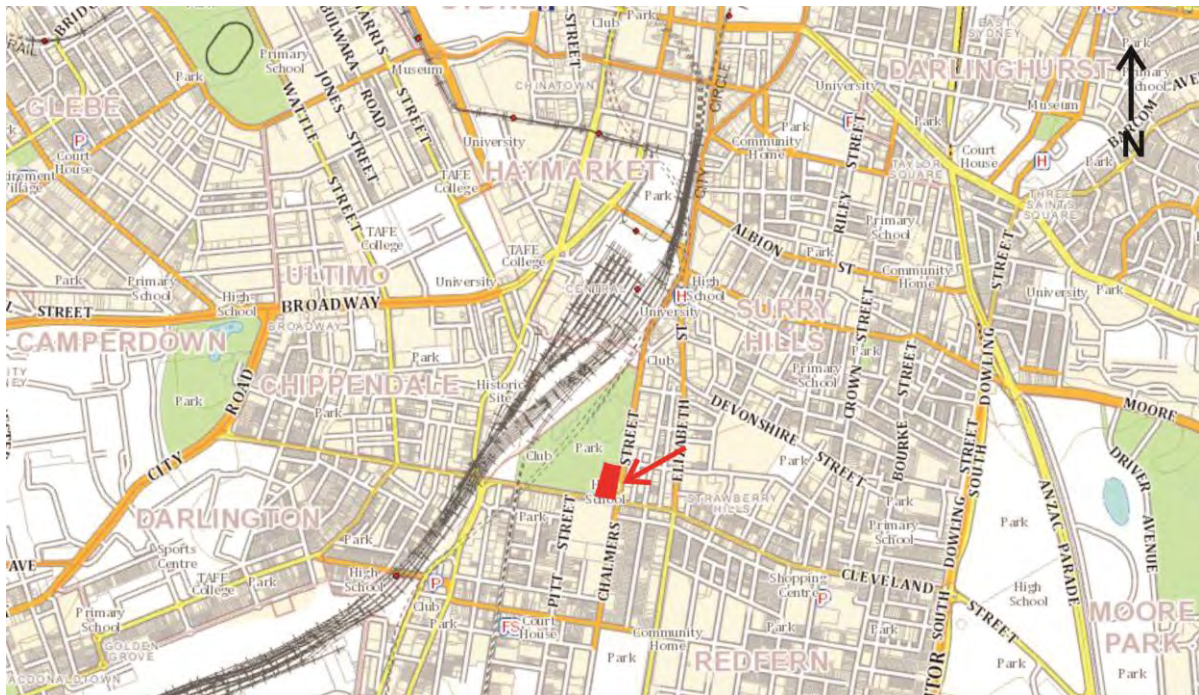
Casey & Lowe have been engaged by OCP Architects on behalf of the Department of Education to prepare an archaeological assessment for the former Cleveland Street Primary School at 244 Cleveland Street, Surry Hills. The site is currently used as the Cleveland Street Intensive English High School. This report has been prepared in response to proposed works to convert the site into a comprehensive secondary school for 1,200 to 1,500 students. It has been prepared to support a State Significant Development Application (SSDA) to be submitted to the Minister for Planning and Infrastructure pursuant to Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

A school has been located in the study area since 1855. The study area is listed as an item of local significance on the Sydney LEP 2012. It is also listed on the Department of Education S170 Heritage and Conservation Register and other heritage lists. A c.1855 Wesleyan parsonage or manse and part of Prince Alfred Park have also occupied part of the study area.

This report assesses the historical archaeological potential of the study area. It does not assess the potential for Aboriginal archaeology associated with the site.

### 1.2 Study Area

The study area, 244 Cleveland Street, is located within the Sydney suburb of Surry Hills (Figure 1.1). It consists of cadastral units DP 797483, DP 797484 and DP 821649. It is on the northwest corner of Cleveland and Chalmers Streets, and is bound by Prince Alfred Park on the north and west (Figure 1.2).



**Figure 1.1: Map showing the location of the study area in red and arrowed. Base map from SIX Maps, NSW LPI.**



Figure 1.2: Recent satellite image of the study area. Base photograph from SIX Maps, NSW LPI.

### 1.3 Previous reports

The heritage of the study area has been the subject of two previous reports:

Perumal Murphy Alessi Heritage Consultants, 2015, *Former Cleveland Street Primary School, No. 244 Cleveland Street, Surry Hills*, report on behalf of the Department of Education, September 2014.

Perumal Murphy Wu Heritage Consultants, 2002, *Draft Conservation Management Plan Cleveland Street Intensive English Centre*, April 2002.

This archaeological assessment was prepared with reference to the 2015 heritage assessment. The 2002 draft DMP was not consulted.

### 1.4 Statutory Constraints

#### 1.4.1 Legislation under Part 4, Division 4.1

##### Environmental Planning & Assessment Act Part 4, Division 4.1

The current project is being undertaken as a State significant development under Part 4, Division 4.1. The Director General's Requirements for this project were updated and reissued on 21 January 2013.

##### *Director-General's Requirements*

The specific issues identified in the DGR's include:

- (2) Policies and Guidelines to be addressed: *Heritage Council Guidelines Assessing the Significance of Archaeological Sites and Relics*.
- (10) Heritage
  - Address the impacts of the proposal on heritage significance of the site and adjacent area including any built and landscape heritage items including places, items or relics of significance to Aboriginal people; and



- Consultation with Office of Environment and Heritage.
- Deliverables Table:
  - Heritage Impact Assessment for SSDA2.
  - Development specific heritage/archaeological reports for SSDA2, SSDA3, SSDA4, SSDA5, SSDA6.

Casey & Lowe are writing a Non-Indigenous Archaeological Assessment that fulfils the guidelines of the NSW Heritage Council and addresses *Assessing the Significance of Archaeological Sites and Relics*.

### **89J Approvals etc - legislation that does not apply:**

As stated in 89J:

1. The following authorisations are not required for State significant development that is authorised by a development consent granted after the commencement of this Division (and accordingly the provisions of any Act that prohibit an activity without such an authority do not apply):
  - (c) an approval under Part 4, or an excavation permit under section 139, of the *Heritage Act 1977*,
  - (d) an Aboriginal heritage impact permit under section 90 of the *National Parks and Wildlife Act 1974*.
2. Division 8 of Part 6 of the *Heritage Act 1977* does not apply to prevent or interfere with the carrying out of State significant development that is authorised by a development consent granted after the commencement of this Division.

In effect, the Department of Planning and Infrastructure provides consent to impact on relics under 89J. Therefore no approvals are required under S139 or S57 of the *Heritage Act 1977* or S90 of the *National Parks and Wildlife Act 1974*. The Department of Planning and Infrastructure will of course consult with the Office of Environment and Planning, both the Heritage Division and the Aboriginal Heritage Section, and the proposed work needs to conform with Heritage Division and Aboriginal Heritage Branch guidelines. This section does not exempt requirements under S170 of the Heritage Act.

#### **1.4.2 NSW Heritage Act 1977**

When a site is not being assessed under the EP&A Act, Part 4.1 the main legislative constraint on archaeological remains is the relics provisions of the *Heritage Act 1977*. Provisions relating to S139 of the *Heritage Act 1977* are suspended by Part 4.1, Division 4.1, S89J.

According to Section 139:

- (1) *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.*
- (2) *A person must not disturb or excavate any land on which the person has discovered or exposed a relic except in accordance with an excavation permit.*
- ...
- (4) *The Heritage Council may by order published in the Gazette create exceptions to this section, either unconditionally or subject to conditions, in respect of any of the following:*
  - a. *any relic of a specified kind or description,*
  - b. *any disturbance or excavation of a specified kind or description,*
  - c. *any disturbance or excavation of land in a specified location or having specified features or attributes,*

- d. *any disturbance or excavation of land in respect of which an archaeological assessment approved by the Heritage Council indicates that there is little likelihood of there being any relics in the land.*

A 'relic' is an item of 'environmental heritage'. Environmental heritage is defined by the *Heritage Act 1977* (amended) as:

*those places, buildings, works, relics, moveable objects, and precincts of State or local heritage significance.*

A relic as further defined by the Act as:

*any deposit, 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.*

#### **1.4.3 Heritage Lists – S170 Register**

The study area, 244 Cleveland Street, Surry Hills is not listed on the State Heritage Register, however, it is included on the Department of Education's S170 Heritage and Conservation Register (SHI Number 4640111).

#### **1.4.4 Statutory and Non-statutory Guidelines**

The management of heritage sites in New South Wales should conform to the requirements of the *Burra Charter* of Australia ICOMOS. Many of the following guidelines provide for best practice conservation approaches and can be used to inform all the management of the archaeological remains. There are a range of archaeological guidelines which inform the management of the place:

*Archaeological Assessment Guidelines*, NSW Heritage Office, Department of Urban Affairs & Planning, 1996. A new draft of this has been prepared but not yet published.

*Assessing Significance for Archaeological Sites and 'Relics'*, Heritage Branch, Department of Planning, 2009.

*NSW Heritage Manual*, NSW Heritage Office, Department of Urban Affairs & Planning, 1996.

*Historical Archaeological Investigations: A Code of Practice*, NSW Department of Planning, 2006.

*Historical Archaeological Sites, Investigation and Conservation Guidelines*, Department of Planning and NSW Heritage Council, 1993.

*Excavation Director's Assessment Criteria*, NSW Heritage Office.

*ICHAM Charter, The ICOMOS Charter for the Protection and Management of Archaeological Heritage*, ICOMOS International, 1990.

*Practice Note – The Burra Charter and Archaeological Practice*, Australia ICOMOS 2013.

*Recommendation on International Principles Applicable to Archaeological Excavations*, UNESCO, 1956.

*Heritage Interpretation Policy and Guidelines*, Heritage Information Series, NSW Heritage Office, August 2005.

*Photographic Recording of Heritage Items*, Heritage Information Series, NSW Heritage Office, 2006.

#### **1.4.5 Sydney Local Environmental Plan 2012**

Although the provisions of the Sydney 2012 LEP are primarily geared for built heritage items, it also includes the following requirements which are relevant to archaeological heritage:

##### **5.10 Heritage conservation**

**(1) Objectives**

The objectives of this clause are:

.....

- (c) to conserve archaeological sites,

**(2) Requirement for consent**

Development consent is required for any of the following:

.....

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

.....

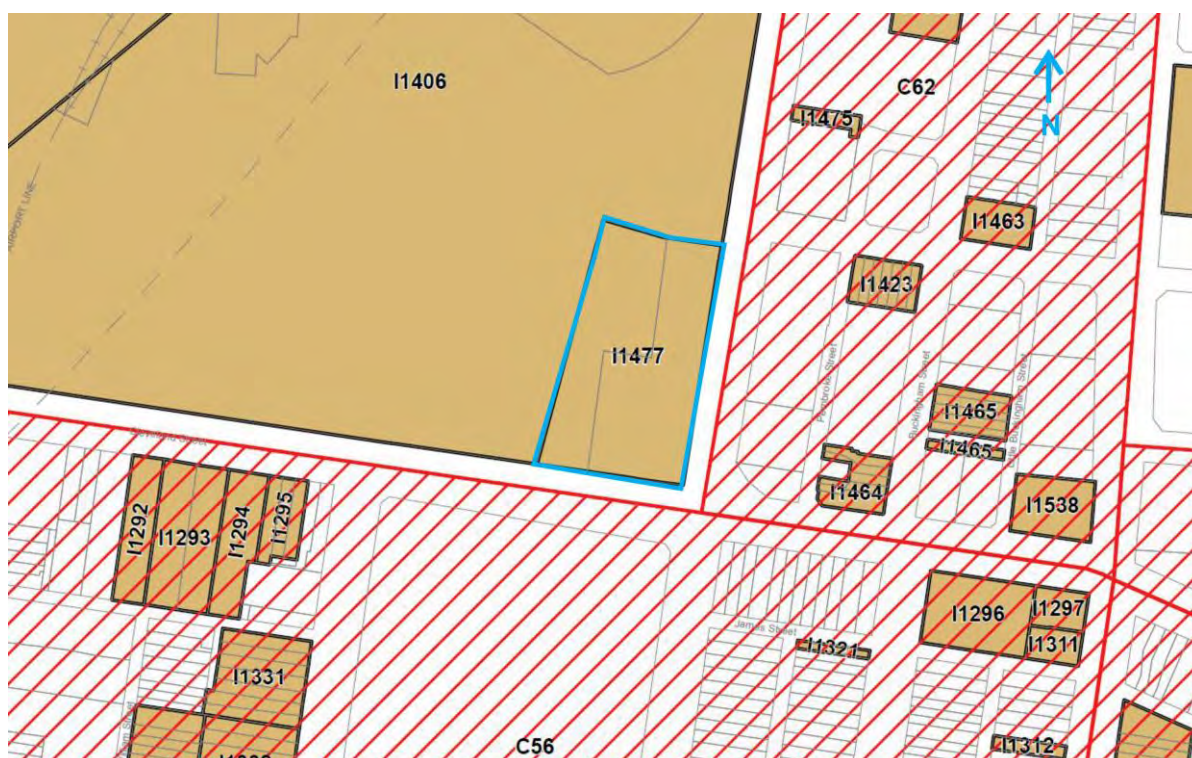
**(7) Archaeological sites**

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

- (a) notify the Heritage Council on its intention to grant consent, and
- (b) take into consideration any response received from the Heritage Council within 28 days after the notice is sent.

**1.5 Heritage listings****1.5.1 Sydney LEP 2012**

The Sydney LEP 2012 lists the entire study area as a heritage item of local significance (I1477), 'Former Cleveland Street Public School, buildings including interiors, grounds and fence plinth'. It also includes neighbouring Prince Alfred Park (I1406), which borders the study area to the north and west (Figure 1.3). The study area is also in the vicinity of the Redfern Estate Heritage Conservation Area (C56) and Cleveland Gardens Heritage Conservation Area (C62), both of local significance.



**Figure 1.3: Detail from Sydney LEP 2012 Heritage Map 16, showing heritage items near the study area which are listed on the LEP, including Prince Alfred Park (I14016) bordering the study area to the north and west. Study area outlined in blue. Red hatching indicates Conservation Area.**

### 1.5.2 Non-statutory heritage listings

A search of the Register of the National Estate (RNE) has been undertaken for the study area and immediate surrounds. This is a key non-statutory heritage list, which provides no statutory protection but is generally considered to be a sign of recognition of the heritage values of a site. The register lists the site itself as 'Cleveland Street Public School, 244 Cleveland St, Surry Hills, NSW, Australia' (Place ID 2247, Place File No. 1/12/0360418). The register provides the following statement of significance:

A picturesque example of a Victorian school complex which retains much of its original character externally and because it enlivens an otherwise mutilated area deserves to be preserved. It is probably the oldest remaining functioning inner suburban school in Sydney and has a long historical association with Redfern and Surry Hills.

Nearby and relevant properties listed on the RNE include:

- Prince Alfred Park, Cleveland Street, Surry Hills
- Cleveland House, 51 Buckingham Street, Surry Hills
- Crown Street Public School at 356 Crown Street, Surry Hills
- Greek Orthodox Church, 242 Cleveland Street, Surry Hills
- Railway Institute Building, Chalmers Street, Surry Hills

The National Trust of Australia (NSW) also includes the study area. Listings by the National Trust provide no statutory protection but are generally considered to be a sign of recognition of the heritage values of a site.



## 1.6 Authorship

This report has been prepared by Sandra Kuiters, Archaeologist/Artefact Specialist, Casey & Lowe, with reference to previous reports by Casey & Lowe. The historical background of this report (Section 2) is based on material written by Perumal Murphy Alessi Heritage Consultants.<sup>1</sup> Overlay plans were produced by Jane Rooke, Archaeologist, Casey & Lowe. This report has been reviewed by Tony Lowe, Director, Casey & Lowe.

## 1.7 Acknowledgements

Csilla Cserhalmi, OCP Architects

## 1.8 Abbreviations

ADB	<i>Australian Dictionary of Biography</i>
b.	born
c.	circa
CMP	Conservation Management Plan
DA	Development Application
DBYD	Dial Before You Dig
DNMT	Does Not Meet Threshold [for local archaeological heritage significance].
DP	Deposited Plan
ha	Hectare
HRA	<i>Historical Records of Australia</i>
IDA	Integrated Development Application
LEP	Local Environment Plan
LPI	Land and Property Information (NSW)
LPMA	Land and Property Management Authority (NSW) [a predecessor to the LPI].
ML	Mitchell Library (in the State Library of NSW)
NLA	National Library of NSW
n.d.	not dated
SHI	State Heritage Inventory
SHR	State Heritage Register
SLNSW	State Library of NSW
SRNSW	State Records of NSW

## 1.9 Glossary

The following terms are used in this report:

### Historical Archaeology (Non-Indigenous/European)

Historical Archaeology (in NSW) is the study of the physical remains of the past, in association with historical documents, since the British occupation of New South Wales in 1788. As well as identifying these remains the study of this material can help elucidate the processes, historical and otherwise, which have created our present surroundings. Historical archaeology includes an examination of how the late eighteenth and nineteenth-century arrivals lived and coped with a new and alien environment, what they ate, where and how they lived, the consumer items they used and their trade relations, and how gender and cultural groups interacted. The material remains studied include:

- Archaeological Sites:
  - below ground: these contains relics which include building foundations, occupation deposits, rubbish pits, cesspits, wells, other features, and artefacts.

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<sup>1</sup> Perumal Murphy Alessi 2015.

- above ground: buildings, works, industrial structures and relics that are intact or ruined.
- cultural landscapes: major foreshore reclamation
- maritime sites: infrastructure and shipbuilding
- shipwrecks
- structures associated with maritime activities.

### **Archaeological Potential**

Archaeological potential is here used and defined as a site's potential to contain archaeological relics which fall under the provisions of the *Heritage Act 1977* (amended). This potential is identified through historical research and by judging whether current building or other activities have removed all evidence of known previous land use.

### **Archaeological Site**

A place that contains evidence of past human activity. Below ground sites include building foundations, occupation deposits, features and artefacts. Above ground archaeological sites include buildings, works, industrial structures and relics that are intact or ruined.

### **Archaeological Investigation or Excavation**

The manual excavation of an archaeological site. This type of excavation on historic sites usually involves the stratigraphic excavation of open areas.

### **Archaeological Monitoring**

Archaeological monitoring is recommended for those areas where the impact of the works is not considered to mean the destruction of significant archaeological fabric. Nevertheless the disturbance of features both suspected and unsuspected is possible. In order to provide for the proper assessment and recording of these features an archaeologist should inspect the works site at intervals they consider to be adequate and to be 'at call' in case the contractor uncovers remains that should be assessed by the archaeologist.

### **Research Design**

A set of questions which can be investigated using archaeological evidence and a methodology for addressing them. A research design is intended to ensure that archaeological investigations focus on genuine research needs. It is an important tool which ensures that when archaeological resources are destroyed by excavation, their information content can be preserved and can contribute to current and relevant knowledge.

### **Research Potential**

The ability of archaeological evidence, through analysis and interpretation, to provide information about a site that could not be derived from any other source and which contributes to the archaeological significance of that site and its 'relics'.<sup>2</sup>

### **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.

(NSW *Heritage Act 1977*, Definitions, Part 1.4)

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<sup>2</sup> NSW Heritage Branch 2009: 11

## 2.0 Historical Background

This historical background summarises those aspects of most relevance to the assessment of the archaeological potential of the study area and is based on an extensive history of the property prepared by Perumal Murphy Alessi Heritage Consultants, 2015, *Heritage Assessment, Former Cleveland Street Primary School, No. 244 Cleveland Street, Surry Hills*.

### 2.1 Basic Phasing and Chronology:

#### 2.1.1 Phase 1

- Natural landscape

#### 2.1.2 Phase 2 (pre-1788)

- Aboriginal occupation

#### 2.1.3 Phase 3 (1788-1850)

- Government land, Cleveland Paddock

#### 2.1.4 Phase 4 (1850-1860s)

- Land was set aside at southwestern corner of government's 'Cleveland Paddock' for a school in 1850 (Figure 1.1).
- The following year land adjoining to the west of school was set aside for a Wesleyan Parsonage.
- Construction of the school underway in 1855. The building was timber with iron cladding and lined in canvas and paper. Outbuildings including water closets supplemented the main building (Figure 2.2). Cleveland Street National School opened in 1856.
- The 1855 City Detail sheet shows a creek running through the site.
- Sometime between 1855 and 1865 the Wesleyan Manse constructed (Figure 2.3).
- In the late 1850s council raise the level of Chalmers (formerly Castlereagh Street) by 6 feet, above the level of the school site, positioning the school in a hollow next to the street corner.
- In 1865 'Cleveland Paddock' was dedicated as Prince Alfred Park.
- The 1865 Trig survey shows creek formalised as oviform brick drain.

#### 2.1.5 Phase 5 (1860s to present)

- In 1868 the new school opened (half covering the footprint of the original steel building). The new building (Building 2) was raised to street level and a covered play area was created beneath.
- The Wesleyan Parsonage was resumed and demolished in 1891 (Figure 2.4).
- In 1893 the new school building fronting Cleveland Street completed (part of Building 1), as well as two additional buildings in the southeast corner of the site.
- A retaining wall and fence were erected along Cleveland Street this same year, and ground levelling was undertaken. The toilet blocks were moved further north, away from the buildings at around this time (Figure 2.5).
- A new stone and brick girls' classroom was constructed in 1895.
- In 1907 a girls' classroom was levelled.
- An additional wing was added to the original building (Building 2), in 1909 and an Infants' building was completed in what was the southwest corner of the site at the time (part of Building 1).
- In 1912 an Intermediate High School for girls and boys was established on the site. The Primary School component continued to operate. A number of portable and pavilion classroom were erected during this period, including a 'fibro' clad structure in the playground used as a science room (Figure 2.5). A 1943 aerial photograph shows number of these small school buildings occupying land which still belonged to the park at this time (Figure 2.6).
- Electric lighting was installed in 1919.

- In 1925 a three storey Boys' School was completed in the northeast corner of the site (Building 3). It had concrete slab floors on the lower levels.
- Tar paving was undertaken in 1934.
- In the 1950s a new canteen and toilet block were built, and the wall of the 1868 building facing the park was strengthened.
- The old science building on the western boundary was demolished in 1959.
- In 1964 the school officially took an area of 2 roods 16 perches from the park, although the school had been occupying this area for some time previously. This consolidated the site that comprises of the three parcels that remain today (Figure 2.7). The new concrete building (Building 4) was constructed along the western portion of the study area.
- Various conservation, repair and upgrading works have been undertaken in the 21st century.

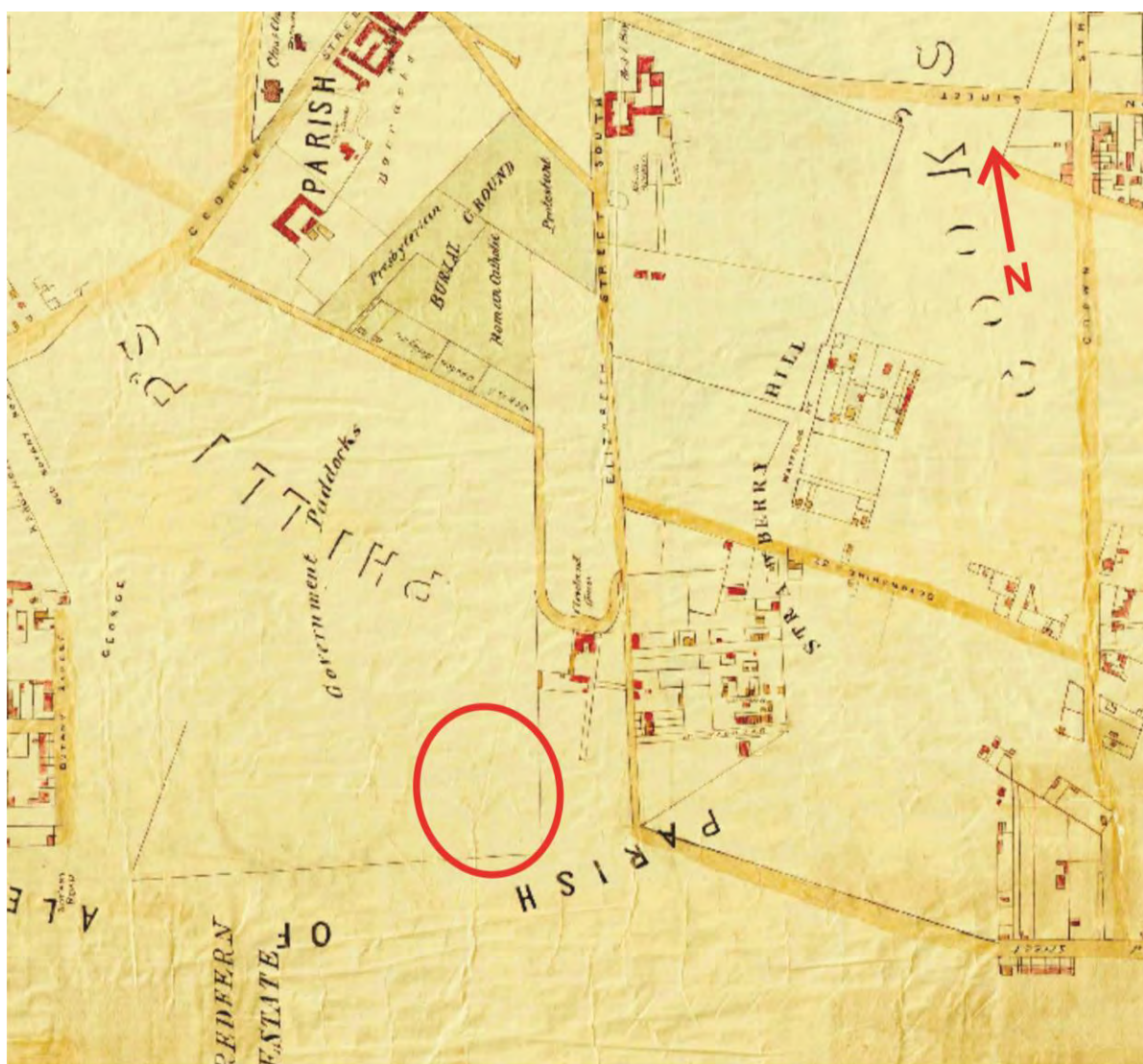


Figure 2.1: Approximate location of the study area in the southeast corner of Cleveland Paddock (circled in red). F.W. Shields, 'Map of the City of Sydney, New South Wales', 1844, *Historical Atlas of Sydney*, City of Sydney Archives.





Figure 2.2: Detail of the site configuration in 1855. The study area is outlined in red and the creek line can be seen crossing the north of the site. Orange shading indicates a water closet and blue shading indicates a building made from iron. City Detail Sheets, 1855, 'Sheet 23', *Historical Atlas of Sydney*, City of Sydney Archives.

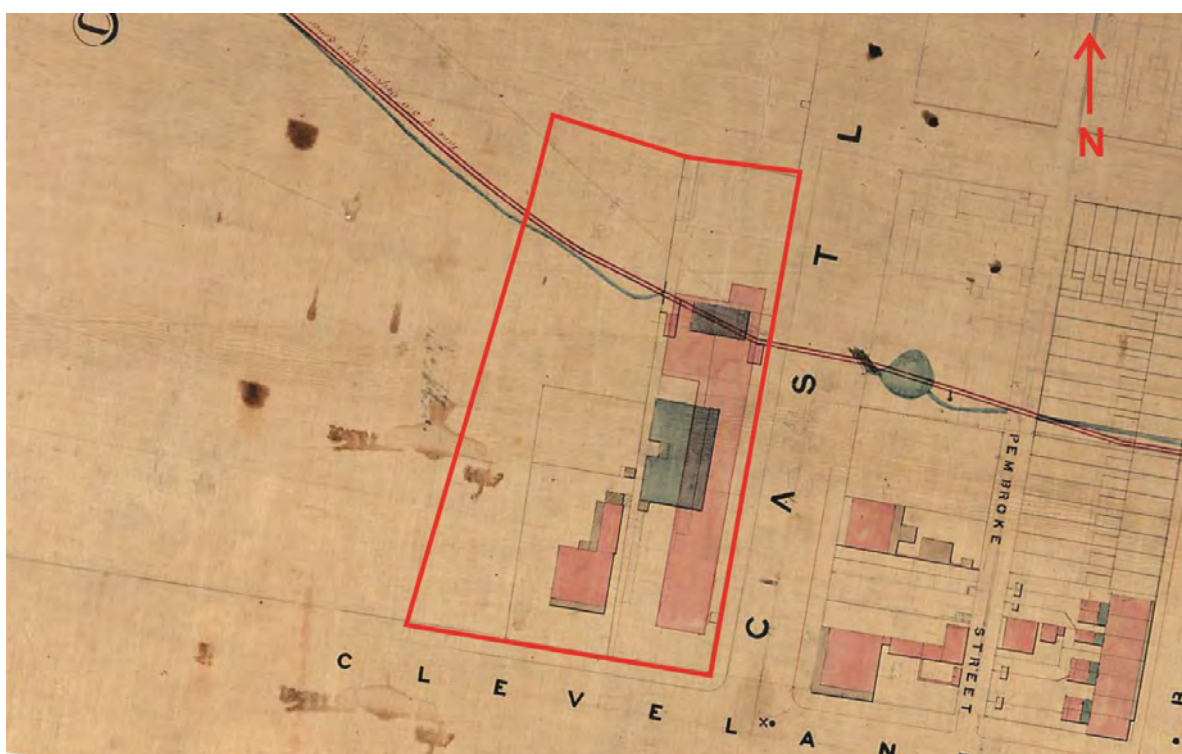


Figure 2.3: Detail of 1865 plan showing the study area outlined in red. The original school building and outbuilding to the north are shown in blue. The pink building overlapping the original buildings was either a later addition to the plan, or a speculative plan of the 1868 school building. The Wesleyan Manse is the pink and grey building to the southwest of the school structures. Trigonometrical Survey, Section S, *Historical Atlas of Sydney*, City of Sydney Archives.



Figure 2.4: This 1886 plan of the site (outlined in red) shows the 1868 school structure. The building in the centre-south of the study area is the Wesleyan Parsonage. 'City of Sydney, Section J2, 1886', Sydney detail sheets, Surveyor-General's Office, NSW, SLNSW.



Figure 2.5: c.1930s plan showing the main school structures at this time, as well as the upgraded toilet block in the centre of the site, and the science building on the western boundary of the study area, on land which was still officially owned by the park at this time. Sydney Water Plan, c.1930, Sydney Water Archives, BLKWTL3848 (2).





Figure 2.6: Multiple buildings within the study area in 1943. Note the buildings in the west and northwest corner of the site, which was still officially part of the park at this time (note air-raid trenches). SIX Maps, NSW LPI. Study area outlined in red.

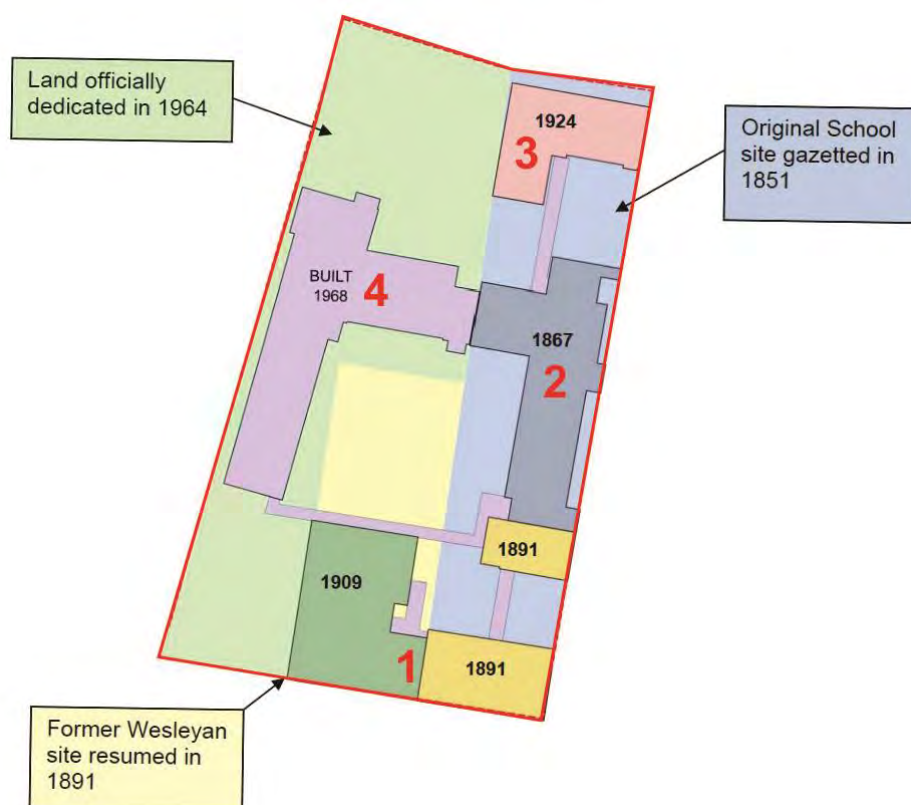


Figure 2.7: Plan showing building numbers and development within the study area over time. Base plan Perumal Murphy Alessi, 2015: 24. Casey & Lowe additions.

### 3.0 Archaeological Potential

#### 3.1 Archaeological Potential

Archaeological Potential is the degree to which archaeological remains are considered likely to survive within the study area in light of modern impacts. This section assesses the Archaeological Potential of the study area based on available information. Section 4 will assess the Heritage Significance of the potential archaeological remains. Sections 5 and 6 will assess the potential impact of the proposed works within the study area and provide recommendations for dealing with any impacts.

#### 3.2 Principles for assessing archaeological potential

A series of assumptions and general principles underlay the analysis of archaeological potential for colonial remains. These have been based on the experience of archaeologists working in New South Wales over the last 30 plus years.

Typical archaeological remains found at domestic sites in New South Wales take a number of forms:

- Structural remains associated with buildings shown on a historic plan are likely to survive but will be impacted by later phases of building. These remains include:
  - building footings
  - underfloor deposits associated with the occupation of a house
  - other types of deposits
- Certain types of remains are typically not shown on historic plans, although they occasionally feature on later plans. These include:
  - wells
  - underground water storage systems, including cisterns and reservoirs
  - cesspits
  - site drainage
  - rubbish pits
  - evidence for gardens, layout and use of the yard areas
  - pet burials
  - fencelines, assisting with clarification of lot boundaries and internal use of lots
  - pollen and soil evidence
  - land clearing and modification of the landform, including major filling events, i.e., backfilling of ponds or the creek line
  - rubbish dumps
  - other types of archaeological deposits

There are also several other common processes which determine the archaeological resource:

- Disused underground features such as wells, cisterns, reservoirs and cesspits tend to be backfilled with rubbish when they cease being used.
- Underfloor deposits typically form where the original flooring was butt-boarded timber floorboards.
  - These can survive in both demolished and standing structures, although the installation of later services and the replacement of flooring can impact on the integrity of underfloor deposits.
  - Underfloor deposits can include both small items which fell between floorboards, and also material which must have been deliberately deposited beneath loose floorboards.
  - Floor coverings such as oil-cloths and carpets can minimise the accumulation of items underneath a butt-boarded timber floor. Floor coverings like these would be more common in wealthier households.



- Subsequent replacement with tongue and groove floorboards or even capping the underfloor void with imported material (a strategy popular for dealing with rats),<sup>3</sup> often will only have a limited impact on any archaeological deposit.
- Later building phases will impact on the remains of early phases.
- The greater the number of phases the more complicated the nature of the archaeological remains.

Other issues arise from the nature of impacts from later 20th-century activities such as demolition, clearing and construction. Generally the following principles apply:

- The later the date a building was demolished, then the greater the impact on the archaeological resource from larger modern machinery.
- Footing systems of single-storey buildings have less impact on the archaeology of earlier phases than those of multi-storey buildings.
- Demolishers and builders typically do as little as they have to because of the need to control costs.
- Higher areas get cut down and levelled and lower damp areas get filled.
- Roadways usually have impacts from modern services.

### 3.3 Site visit

On 30 June 2016, Tony Lowe, Sandra Kuiters and Jane Rooke, Casey & Lowe Pty Ltd, visited the property at 244 Cleveland Street and inspected the school grounds with particular focus on the outdoor areas. The interiors of the standing buildings were considered to have no archaeological potential (see Section 3.4) and were therefore not examined during the site visit.

There was considerable variation in ground level throughout the site. While it is known that the level of Chalmers Street was raised by 6 feet (1.8m) in the 1850s, there appears to be more than 6 feet separating the level of Chalmers Street from the ground level of the school in the eastern portion of the site (Figure 3.1). In this part of the site, the level of the ground appears to have been cut down below the original ground level to enable the use of the space below Building 2. Some parts are more cut down than others, and the most cut down area corresponds with the approximate location of the original 1855 school building (Figure 3.2).

Across the rest of the site the ground level generally stepped down from the southeast to the northwest, consisting of largely flat areas linked with sets of stairs. As a result of this terracing, the north and west of the site was more-or-less level with neighbouring Prince Alfred Park (Figure 3.3).

Most of the outdoor area of the site was covered in bitumen and various trees and garden beds were interspersed throughout the site (Figure 3.2). Multiple drainage grates and service access covers were also observed, indicating an extensive network of underground services.

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<sup>3</sup> This practice was observed at workers' housing excavated as part of the Darling Quarter redevelopment (Casey & Lowe 2013:412-413).



**Figure 3.1:** Playground area in the east of the site, between Buildings 1 and 2. The level of Chalmers Street is at the top of the sandstone retaining wall. View to the east.



**Figure 3.2:** Playground area to the west of Building 1 showing changes in ground level. The arrow points to the approximate location of the western half of the original school building. Note the multiple trees and garden beds. View to the north.





**Figure 3.3: Playground in the northwest corner of the site, looking toward Prince Alfred Park. View to the northwest.**

### 3.4 Overview of archaeological potential

The development and use of the land within the study area outlined in Section 2 has identified the following key structures:

- Original school building (1855 to c.1867)
- Wesleyan parsonage (c.1855 to 1891)
- Second school building (1868 to present)
- Brick oviform drain (pre-1865 to present)
- School building fronting Cleveland Street (1893 to present)
- School building, northeast corner of site (1924 to present)
- School building along western boundary of site (1964 to present)

A composite plan showing the location of known structures on the site since the 1850s is presented in Figure 3.4. This includes those listed above, as well as a number of smaller structures including various toilet facilities and temporary/portable buildings. Other small buildings are likely to have occupied parts of the site without having been recorded on known, surviving plans. Figure 3.5 divides the site into areas of archaeological potential based on the known location of both demolished and standing structures. Each level of archaeological potential will be discussed below.

The architect of the 1868 school structure recommended that the building be of brick cavity construction with stone foundations and hardwood floors on hardwood joists and bearers. Standing structures sometimes contain artefact deposits below floorboards and inside wall cavities, however, the continuous and intensive use of this building as an educational facility for more than 150 years means the likelihood of this type of archaeological material remaining *in situ* is very low. The interior of the 1868 structure has therefore been excluded from any further discussion of archaeological potential. All other buildings on the site are considered to be too modern to include archaeologically significant artefact deposits, and have similarly been excluded from any further discussion of archaeological potential.





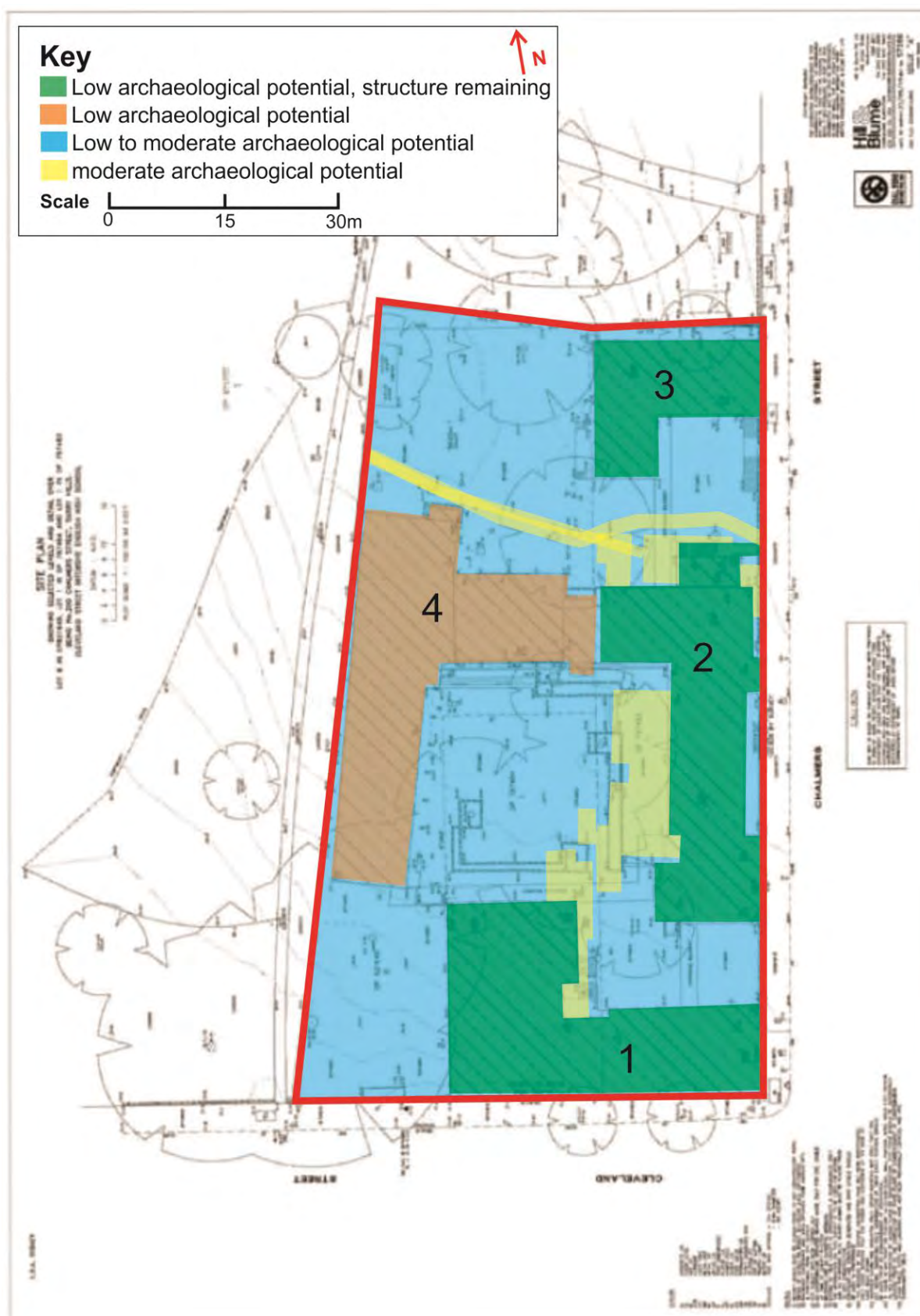


Figure 3.5: Archaeological potential throughout the study area. Buildings which are still standing have not been outlined but are indicated by the numbers 1-4 and black hatching. Base plan from Perumal Pedavoli 2015: 7.

### 3.4.1 Low archaeological potential, structure remaining

There is low potential for archaeological remains to survive beneath the still-standing structures which are not being demolished (Buildings 1, 2 and 3). These areas have been separated from other areas of archaeological potential because any archaeological remains below these structures are likely to have been significantly disturbed by the building of the present structures.

### 3.4.2 Low archaeological potential

The area below the 1960s structure (Building 4) has been assessed as having low archaeological potential. The foundations of the present large, concrete building are likely to have removed all but the deepest traces of archaeological remains. Furthermore, this area was part of Prince Alfred Park throughout most of the 19th century. The only structure known to have been located within this area was the science building, dating to c.1912. No remains of this building are expected to have survived. Other buildings related to the school may have been located in this area but evidence of these is similarly not expected to have survived.

### 3.4.3 Low to moderate archaeological potential

Much of the site has been assessed as having low to moderate archaeological potential. These areas are likely to have been significantly disturbed by ground levelling and landscaping activities, the installation and upgrade of services, and other various activities throughout the site's history. It is, however, possible that intact archaeological remains of unrecorded structures and artefact deposits survive in these areas.

In 1890, it was noted that almost the whole of the site (then just the eastern half of the study area) was covered in buildings. These additional buildings are not evident on any of the historic plans so it is not known exactly where they were located. There is therefore a low to moderate potential for the remains of these unrecorded structures to be present, particularly in the eastern half of the site. Unrecorded structures associated with the use of the park and the parsonage are also possible, but are not thought to be likely. Small structures, wells, cisterns and cesspits are possible, as well as fencelines. These might be associated with the school, parsonage or park.

Non-structural features associated with the use of the park, parsonage and school are also possible. These features may include yard deposits, rubbish dumps and drainage channels, as well as garden plantings and other evidence of early land clearance and landscaping.

There is a very small possibility of evidence of early land clearance and cultivation associated with the use of the site as part of the government's Cleveland Paddock. If such remains survive, they are most likely to be located in the areas of low to moderate potential. These remains could be in the form of tool marks and tree boles and are likely to be ephemeral and heavily impacted by later activities at the site.

### 3.4.4 Moderate archaeological potential

Areas identified as having moderate archaeological potential correspond with the locations of known 19th-century structures and features outside of the footprints of standing structures. These features include those associated with the first phase of school buildings, the parsonage, and a c.1865 brick oviform drain following an earlier creek line (Figure 2.2 and Figure 2.3). It should be noted that the level of the ground may have been cut down in some areas assessed as having moderate archaeological potential. It is possible that deeper remains may have survived in areas that have been cut down but these are likely to have been truncated from above.

The original school building and at least one of its outbuildings are known to have been built of timber frames with iron cladding (Figure 2.2). Most of these buildings are within the footprint of the still standing 1868 structure (Building 2). These remains are likely to be quite ephemeral and are likely to



## 4.0 Heritage Significance

### 4.1 Heritage Significance

The heritage significance of archaeological features is distinct from archaeological potential. Assessment of archaeological potential considers the probability of physical evidence from previous human activity to still exist on a site. Assessment of heritage significance for archaeological features considers the cultural values associated with those remains.<sup>4</sup> This section will briefly outline the basis of assessing the heritage significance of archaeological remains, before then assessing heritage significance of the identified potential archaeological features.

The overall heritage significance of the study area has been assessed in the 2015 Heritage Assessment for 244 Cleveland Street, Surry Hills. That report provided the following statement of significance:

The former Cleveland Street Public School is of historic, aesthetic and social significance as a good and relatively rare example of a Victorian period public school that was designed to respond to the site conditions and has grown and developed in accordance to changing requirements in the educational system and local area.

The site has had continuous educational use since the 1850s and is associated with the National School Board and its successors and prominent architects including GA Mansfield, WE Kemp, WL Vernon, RMS Wells and EH Farmer.

The School is located on a prominent corner site. Buildings 1 and 2 in particular due to the character, their brick and stone facades, steep pitched roofs and tower (Building 2) have landmark status. These buildings were also significantly designed to respond to the site conditions.

The site has had continuous educational use since the 1850s and is of high social significance with strong association with the local communities of Surry Hills, Redfern and Chippendale.

The Cleveland Street Public School retains a largely intact and Victorian period School building that is believed to be one of the earliest in Australia to incorporate a covered playground area within the basement of the building (Building 2). The building context is enhanced by early stone retaining walls, step, piers and palisade fencing and a number of mature trees also occupy the site and contribute to the historic and aesthetic character and significance of the place.<sup>5</sup>

This report does not replace that overall heritage assessment and statement of significance. Instead it is limited to an assessment of the heritage significance of the potential archaeological remains identified in Section 3.4. These are:

- Evidence of the original 1855 school building and associated structures.
- Evidence of the c.1855 Wesleyan parsonage and associated structures.
- A c.1865 brick oviform drain and earlier creek line.
- Evidence for other unrecorded structures associated with the school, parsonage and park.
- Artefact deposits including rubbish pits associated with the school, parsonage and park.
- Evidence for landscaping, clearance and gardening activities associated with the school, parsonage and park.

### 4.2 Heritage significance and archaeology

A number of guidelines are relevant to the heritage assessment of historical archaeological remains. In NSW the most relevant of these are those developed by the Heritage Branch (now the Heritage Division) in 2009: *Assessing Significance for Historical Archaeological Sites and 'Relics'*. The heritage criteria, adopted by the NSW Heritage Council and the associated guidelines issued in 2001 (NSW

<sup>4</sup> This distinction has long been recognised by historical archaeologists working in heritage management, but has recently been restated in *Practice Note – The Burra Charter and Archaeological Practice* (Australia ICOMOS 2013:7).

<sup>5</sup> Perumal Murphy Alessi 2015: 53.



*Heritage Manual - Assessing heritage significance*), are also foundational to establishing archaeological significance.

Relics must also be ranked according to their heritage significance as having:

- Local Significance
- State Significance

If a potential relic is not considered to reach the local or State significance threshold then it is not a relic under the NSW *Heritage Act 1977*.

Section 4A of the NSW *Heritage Act 1977* defines the two levels of heritage significance as follows:

*'State heritage significance'*, in relation to a place, building, work, relic, moveable object or precinct, means significance to the State in relation to the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item.

*'local heritage significance'*, in relation to a place, building, work, relic, moveable object or precinct, means significance to an area in relation to the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item.<sup>6</sup>

New criteria were developed in 2009 to identify whether the archaeological resource is of Local or State significance.<sup>7</sup> The following four criteria and associated questions were identified in the 2009 guidelines and are relevant to historical archaeological sites:

- Archaeological Research Potential (current NSW Heritage Criterion E).
- Associations with individuals, events or groups of historical importance (NSW Heritage Criteria A, B & D).
- Aesthetic or technical significance (NSW Heritage Criterion C).
- Ability to demonstrate the past through archaeological remains (NSW Heritage Criteria A, C, F & G).<sup>8</sup>

The 2009 significance guidelines were designed to assess significance in light of the amendments to the definition of relics, which required them to be of either local or State significance. The examples provided, however, were fairly obvious ones, and do not help us to work out how a less obvious site has State rather than local significance. This means that it is basically down to the skill and expertise of the archaeologist assessing the site to make the distinction between local and State significance.

## 4.3 Discussion of Heritage Significance

### 4.3.1 Discussion using Heritage Council Significance Criteria

#### Criterion (a): Historic Significance – (evolution)

*an item is important in the course, or pattern, of NSW's cultural or natural history (or the cultural or natural history of the local area);*

The potential archaeological remains of the original 1855 school are representative of the government response to the educational needs of increasing numbers of children in Sydney during the Gold Rush.

<sup>6</sup> NSW Heritage Act 1977 (current January 2014), section 4A; NSW Heritage Branch 2009:6.

<sup>7</sup> NSW Heritage Branch 2009.

<sup>8</sup> NSW Heritage Branch 2009:11-13.

**Criterion (b): Associative Significance – (association)**

*an item has strong or special association with the life or works of a person, or group of persons, or importance in NSW's cultural or natural history (or the cultural or natural history of the local area);*

The standing structures are associated with a number of architects, however, the potential archaeological remains of the school, parsonage, park or Cleveland Paddock are not thought to be associated with any particular individual or group of people.

**Criterion (c): Aesthetic Significance - (scenic qualities / creative accomplishments)**

*An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (or the cultural or natural history of the local area);*

The potential archaeological remains are not expected to exhibit a particularly high degree of creative or technical achievement. They are expected to have been built using the building practices typical of when they were constructed.

Any archaeological remains within the study area have also little potential for aesthetic significance. While archaeological remains may have aesthetic value, mostly through their novelty and age, they are not usually 'important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW'. Their aesthetic values are more by accident than design.

**Criterion (d): Social Significance - (contemporary community esteem)**

*an item has a strong or special association with a particular community or cultural group in NSW for social, cultural or spiritual reasons (or the cultural or natural history of the local area);*

No public consultation has been undertaken relevant to the potential archaeology of the study area. Anecdotally there does appear to be fairly strong public interest in the archaeology of Sydney, and archaeological programs usually engender considerable interest.

The potential archaeology may be of particular interest to former students and staff of the school, as well as local residents and members of the Wesleyan community.

**Criterion (e): Technical/Research Significance - (archaeological, educational, research potential and scientific values)**

*an item has potential to yield information that will contribute to an understanding of NSW's cultural or natural history (or the cultural or natural history of the local area);*

The potential archaeological remains on the site have limited research significance. They have some potential to provide further information regarding:

- The original layout of the school and parsonage, and the way in which these facilities were used.
- The material culture and patterns of consumption of the occupants of the site, particularly in the form of rubbish dumps and backfilled cesspits.
- How the natural topography has been modified, particularly in the vicinity of the former creek line.

Other relevant research questions may arise depending on the results of the archaeological program.

The majority of the potential archaeological remains are expected to relate to the school's occupation of the site since the 1850s. Archaeological remains related to the former parsonage are also possible. Archaeological evidence related to the use of the site as part of Prince Alfred Park and Cleveland Paddock are much less likely. No structures associated with the park or paddock are known to have

existed within the study area, and remains of land clearance and cultivation are likely to be quite ephemeral.

**Criterion (f): Rarity**

*an item possesses uncommon, rare or endangered aspects of NSW's cultural or natural history (or the cultural or natural history of the local area);*

Archaeological remains of the original 1855 school building and c.1855 parsonage would be considered fairly uncommon and could present evidence not found elsewhere in Sydney. The site, however, is anticipated to have been subject to a major level of disturbance.

**Criterion (g): Representativeness**

*an item is important in demonstrating the principal characteristics of a class of NSW's cultural or natural places of cultural or natural environments (or the cultural or natural history of the local area).*

The potential archaeological remains within the study area would be broadly representative of the mid 19th-century government-owned facilities in NSW. The archaeological investigation of the site would fill-out what is already known about government educational facilities in the 19th century. Remains related to the occupation of the parsonage would add to our understanding of mid 19th-century ecclesiastical housing.

**Integrity**

The integrity of the potential archaeological remains is believed to be fairly poor. The intensive and continuous use of the site as an educational facility for more than 150 years means any archaeological remains are likely to have been impacted by construction and maintenance works, the installation and upgrade of services, and various landscaping and gardening activities.

#### **4.4 Statement of Heritage Significance**

The potential archaeological remains at 244 Cleveland Street, Surry Hills relate to the 1855 school, the c.1855 Wesleyan parsonage and a c.1865 brick oviform drain and earlier creek line. Archaeological remains related to the use of the site as part of a park and Cleveland Paddock are also possible, but less likely. This potential evidence may be in the form of foundations of various structures, and artefact deposits such as rubbish pits and backfilled cesspits. Evidence for landscaping, clearance and gardening activities is also possible.

These potential remains have limited ability to provide further information regarding the original layout of the school and parsonage, and the way in which these facilities were used. If archaeological deposits associated with the occupation of the site were located, these would provide information regarding the material culture and patterns of consumption of the occupants. Evidence for how the natural topography of the site has been modified, particularly in the vicinity of the former creek line, is also possible. This information is unlikely to be available from other sources, such as historical records, and it would add to the knowledge of the history of government educational facilities in NSW, and possibly also the development of the Wesleyan community.

The potential archaeological remains are of local heritage significance.

## 5.0 Proposed Works

### 5.1 Description of proposed works

The proposed works at 244 Cleveland Street, Surry Hills, relate to the redevelopment of the Cleveland Street Intensive English High School site as a 1,200 or 1,500 place comprehensive secondary school. Three of the four main buildings that currently house the school will be retained (Buildings 1, 2 and 3), while the fourth will be demolished and replaced by a multi-storey building (Figure 5.1). Lifts will also be installed next to Building 2 and Building 3. The Master Plan Project brief developed three concept master plan options for the school:

- Option 1 provides for 1,200 students. It incorporates an undercroft space at park level, beneath a new 14-storey building (Figure 5.2).
- Option 2 provides for 1,200 students. It partially excavates a new 14-storey building to accommodate a gymnasium on the ground floor.
- Option 3 provides for 1,500 students. It incorporates an undercroft space at park level, beneath a new 17-storey building.

Option 1, for 1,200 students, was identified as the preferred option by the Project Advisory Group.



Figure 5.1: The footprint of the new building within the study area (outlined in red). Other buildings are numbered 1-3. Base plan Perumal Pedavoli 2015: 23, Casey & Lowe additions.

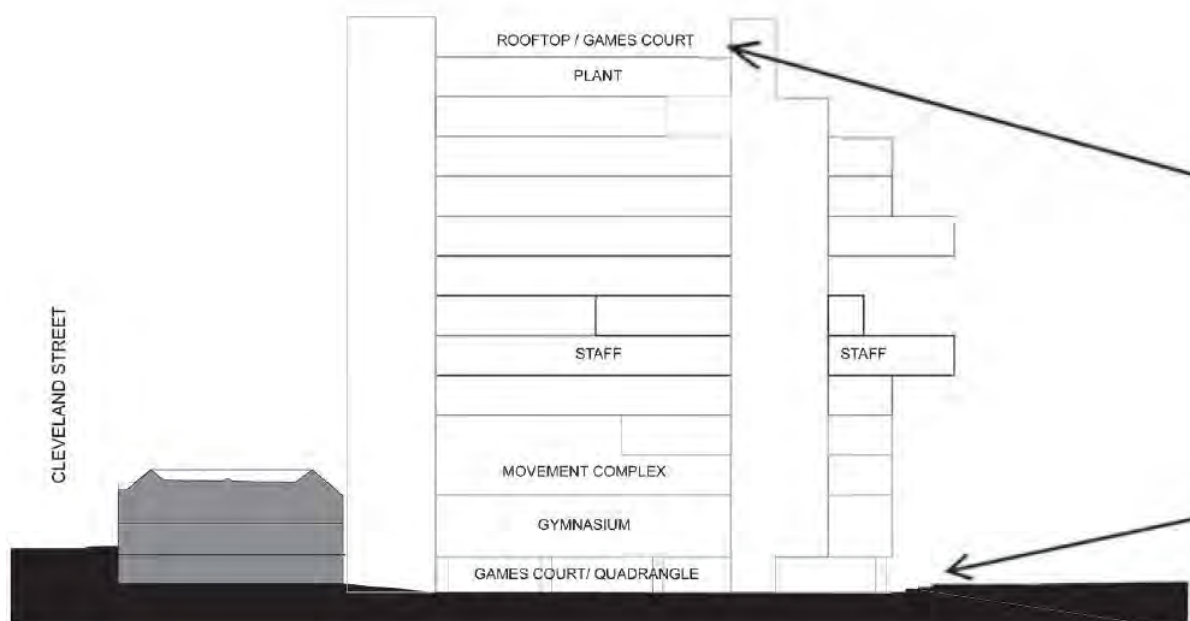


Figure 5.2: Detail of Concept Plan 1, Section drawing of the new building. Perumal Pedavoli 2015: 29.

## 5.2 Impacts of proposed works

The proposed works are expected to have varying degrees of impact on potential archaeological remains within the study area. Any archaeological remains within the footprint of the proposed new building are likely to be entirely removed, particularly in the case of Concept Plan 2, which partially reduces the existing ground level to accommodate a gymnasium. All three concept plans describe a multi-storey building of between 14 and 17 stories high (Figure 5.3). The foundations for such a structure would almost certainly remove any archaeological remains in their vicinity. Similarly, the excavation of four proposed lift pits is likely to remove any archaeological remains in these locations (Figure 5.3).

Much of the new building and two of the proposed lift pits are within the area of Building 4. This building, dating from the 1960s, is likely to have already significantly impacted any archaeological remains within its footprint and has therefore been assessed as having low archaeological potential (Figure 5.3). The other lift pits, and most of the rest of the proposed building sit within areas assessed as having low to moderate archaeological potential. Construction of the proposed building and excavation of the lift pits may result in the removal of archaeological remains such as unrecorded structures, wells, cisterns, cesspits, yard deposits, rubbish dumps, drainage channels, garden plantings and evidence of early land clearance and landscaping.

Finally, the proposed building is over the top of the early creek line and c.1865 brick drain. These have been addressed as having moderate archaeological potential, and are likely to be disturbed or removed by the proposed structure.

Additional impacts to archaeological remains in other parts of the study area are possible during the course of construction and upgrading works. In particular, landscaping and gardening works have the potential to disturbed or remove archaeological remains.



Figure 5.3: The footprint of the new building in relation to archaeological potential. The study area is outlined in red. Base plan Perumal Pedavoli 2015: 23, Casey & Lowe additions.



## 6.0 Mitigation of Impacts

The impacts to the potential archaeological resource can be managed and mitigated through a strategy of archaeological monitoring. This strategy is considered appropriate given that the archaeological remains are thought to have only low to moderate potential.

A program of archaeological monitoring would involve the following:

- An archaeologist should inspect the works site at intervals they consider to be adequate. This would probably include watching the initial excavation for the proposed building in the area of the early creek line and c.1865 drain.
- An archaeologist would also be 'at call' in case the contractor uncovers unexpected remains, including structural features and artefact deposits.
- If archaeological remains are exposed during the works it will be necessary to record these to an appropriate level, including plans and photographs. This may involve a short, localised stoppage of works.
- Any artefacts collected would be catalogued in accordance to Casey & Lowe methodology.
- The archaeological investigations should be in line with the research design outlined in Section 7.0 of this report.

## 7.0 Research Design

Given the close connection between archaeological heritage potential and research potential, it is appropriate for all archaeological investigations, including monitoring, to have research designs.<sup>9</sup> The archaeological monitoring during the proposed works should endeavour to address the following research questions:

- What evidence is there for the original layout of the school, parsonage and park?
- Is there any identifiable material cultural remains associated with the school, parsonage or park? Does this provide any insight into how these spaces were used?
- Is there any evidence of the 1850s school or parsonage toilets? Were these toilets built as water closets, or were they originally built as unplumbed privies and later connected to the sewage system? If they were converted, are there any backfilled artefact deposits within the privies?
- Are there any discrete rubbish pits within the area of excavation? If so, what insights into the patterns of consumption of the occupants of the school or parsonage do these provide?
- How has the natural topography been modified to accommodate its present use? Is there any evidence of backfilled artefact deposits within the creek line?
- Is the c.1865 drain the same as the brick drain indicated on the current Sydney Water plan? If so, how much of the original fabric survives?

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<sup>9</sup> NSW Heritage Office 1996:29.

## 8.0 Recommendations

1. The proposed design indicates there is a small possibility that archaeological remains of potential local heritage significance will be impacted during construction works. In order to mitigate this impact, archaeological monitoring is recommended.
2. A program of archaeological monitoring needs to be undertaken by an appropriately qualified archaeologist, as outlined in Section 6.0.
3. A report presenting the results of the archaeological program and artefact catalogue will be a condition of consent and will be prepared at the end of the archaeological program.
4. Any archaeological program needs to be reported on in accordance with Heritage Council guidelines.
5. Any artefacts collected and retained during the works will need to be catalogued and then securely stored by the client after the completion of the archaeological program.



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ARCHAEOLOGY – HERITAGE – MEDIATION – ARBITRATION

# **244 CLEVELAND STREET, SURRY HILLS**

## **Aboriginal Archaeological Assessment**

PREPARED BY  
REPORT TO  
LGA  
VERSION NO  
DATE

TORY STENING AND ALANDRA TASIRE  
OCP ARCHITECTS  
CITY OF SYDNEY COUNCIL  
C.2016  
AUGUST 2016

## DOCUMENT CONTROL

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C	15/08/2016	Tory Stening	Tory Stening	Jillian Comber

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# EXECUTIVE SUMMARY

OCP Architects on behalf of the Department of Education (DoE) are preparing a Conservation Management Plan (CMP) for the former Cleveland Street Public School which is now known as the Cleveland Street Intensive English High School. DoE propose to redevelop the former Cleveland Street Public School into a new Inner City High School with 1,200 to 1,500 places.

Comber Consultants were engaged to prepare this assessment to inform the CMP. This assessment includes an Aboriginal history for the former Cleveland Street Public School, the results of a site inspection, a review of the environmental and archaeological background of the study area and the Aboriginal heritage significance of the subject area. Policies for inclusion in the CMP are provided in section 9. This report has been written in accordance with the Office of Environment & Heritage's Code of Practice for *Archaeological Investigation of Aboriginal Objects in NSW* and provides the following recommendations:

1. Prior to any redevelopment of the site Aboriginal community consultation should be undertaken in accordance with OEH's *Aboriginal Cultural Heritage consultation requirements for proponents 2010*.
2. Once the above consultation has been undertaken, an Aboriginal Heritage Impact Permit should be applied for, prior to any redevelopment of the site.
3. Once the AHIP has been received archaeological testing and salvage should be undertaken, prior to any redevelopment of the site.
4. The policies detailed in this report should be included in the Conservation Management Plan.