6 CONSERVATION POLICY

6.1 Introduction

Conservation can be regarded as the management of change. In such instances it seeks to safeguard what is significant about a place within a process of change and development. It is essential to establish principles, policies and recommended actions for the conservation and ongoing use of a place to ensure best-practice heritage management. Within this framework owners and managers of the place will be best able to formulate suitable proposals for change and consent authorities will be able to assess those proposals against the site-specific policies.

The conservation policies aim to assist with the long term use, maintenance, conservation and potential development of Graythwaite. They are intended to manage change rather than prohibit it. Where appropriate, each policy is supported by explanatory text and/or a series of guidelines that aim to ensure that future decisions about the place are made in an informed manner.

The following heritage management principles should be adopted by the Shore School and relevant approval authorities:

- 1. The Summary Statement of Heritage Significance within Section 4 of this CMP should be adopted as the basis for heritage management. All decisions should consider and seek to retain the values identified in the Summary Statement of Heritage Significance.
- The future conservation and development of Graythwaite should be carried out in accordance
 with accepted conservation principles and processes including the Australia ICOMOS Charter
 for the Conservation of Places of Cultural Significance (the Burra Charter), which provides the
 Australian standard for conservation practice.
- 3. The conservation approach for specific spaces, elements and fabric set out in this CMP should be endorsed as a guide to future works.
- 4. Conservation of the heritage significance of Graythwaite should be actively managed in conjunction with the ongoing and future uses of the place.
- 5. Appropriate funding should be made available for the ongoing maintenance and conservation of Graythwaite. This would include ensuring that the buildings are weatherproof and regularly maintained and that the site is made secure and protected from potential hazards.
- 6. Care should be taken in the planning and implementation of any works, including conservation and future development proposals to avoid, minimise and/or mitigate any adverse impacts on the heritage significance of the place.

The policies have been grouped under the following headings most relevant to the management of the heritage significance of the place:

- general management polices;
- heritage conservation;
- interpretation;
- cleaning, maintenance and repair; and
- site redevelopment.

6.2 General Management Policies

6.2.1 CMP Adoption and Implementation

- Policy 1 The CMP should be adopted by the Shore School as the basis for the effective management of the heritage significance of Graythwaite.
- Policy 2 Heritage objectives should be fully integrated into the management structure of the Shore School to ensure that:
 - staff, students and other site users are made aware of the heritage significance of Graythwaite and the key objectives for heritage management;
 - roles and responsibilities for heritage management are clearly established; and
 - an appropriate balance is achieved between the functional requirements of the school and the heritage imperatives applying to Graythwaite.

Appropriate resources and funding should be put in place by the Shore School to allow for the CMP recommendations to be implemented.

Responsibility for the management of Graythwaite rests with the Shore School. This CMP has been prepared to assist the School and should therefore be adopted by it as the basis for management of the heritage significance of Graythwaite.

A management plan is only effective if its provisions are implemented. It is therefore important that the School ensures that staffing and financial management arrangements, resources and processes allow for and contribute to the effective implementation of this CMP.

6.2.2 CMP Endorsement and Review

- Policy 3 The CMP should be submitted to the Heritage Council of NSW for endorsement.
- Policy 4 The CMP should be submitted to the North Sydney Council for their information and consideration.
- Policy 5 The CMP should be reviewed and amended within five years of its endorsement by the Heritage Council of NSW, or earlier if alternative uses or new directions are to be considered. CMP reviews and amendments should be undertaken consistent with Burra Charter principles and Heritage Council of NSW guidelines using appropriate heritage management expertise.

Endorsement of the CMP by the Heritage Council of NSW is a requirement under the *Heritage Act* 1977 (NSW). Submission of the CMP to North Sydney Council prior to or as part of any development application(s) is likely to be a requirement for major works under the LEP. In both cases, the CMP would assist with the assessment and gaining approval for future works at Graythwaite.

Review of the CMP on a regular basis is also required to ensure that it continues to accurately document the heritage significance of Graythwaite as well as appropriately address key heritage management issues.

6.2.3 Best Practice Heritage Management

- Policy 6 Management of Graythwaite should be in accordance with best-practice heritage management principles and guidelines including:
 - The Australia ICOMOS Charter for Places of Cultural significance 1999 (the Burra Charter); and
 - the guidelines produced by the Heritage Council of NSW.
- Policy 7 Appropriate conservation skills and experience should be used to document and supervise conservation works.
- Policy 8 All conservation works should be undertaken in consultation with qualified and experienced conservation professionals acting within the guidelines of the CMP.
- Policy 9 A clear process for engaging suitably qualified consultants, building contractors, project managers and tradespeople that have experience with working on historic sites and buildings should be established.

Graythwaite is a place of State heritage significance, which requires best-practice heritage management. There is a diverse range of elements at Graythwaite that require specialist skills such as conservation architects, structural engineers, building code compliance advisers, archaeologists and materials conservation specialists. The coordination and briefing of these specialists is a task that should also be performed by suitably qualified people such as architects with experience in heritage conservation acting on behalf of the Shore School. Under no circumstances should decisions relating to conservation be left to a tradesperson acting alone.

6.2.4 Additional Assessment Work

- Policy 10 The following should occur prior to undertaking any maintenance, conservation or new works on any significant elements, spaces or fabric:
 - augment the assessment of heritage significance by undertaking more detailed investigation, recording and assessment of the documentary and physical evidence associated with the component, element, space or fabric;
 - determine the appropriate conservation approach; and
 - set out a comprehensive schedule of conservation actions, based on the accepted conservation approach.

Significant elements, spaces and fabric are identified in Section 4 of this CMP. The purpose of the additional investigation and assessment is to assist in the determination of the impact of future works on significant elements, spaces or fabric. It is also to assess the suitability of specific adaptive re-use works required for the accommodation of a new use or the upgrading of facilities for an existing function and would include an assessment of the impact of:

- detailed alterations in relation to significant elements, spaces and/or fabric; and
- removal of unsympathetic additions that may or may not reveal or deface significant elements, spaces and/or fabric.

6.2.5 Records of Maintenance and Change

- Policy 11 All works, including changes to building fabric and landscape features, particularly unavoidable changes to significant elements, spaces or fabric should be recorded consistent with the following Heritage Branch, NSW Department of Planning guidelines:
 - Photographic Recording of Heritage Items Using Digital Film Capture;
 - How to Prepare Archival Recordings of Heritage Items; and
 - Maintenance Series 1.2: Documenting Maintenance and Repair.
- Policy 12 A copy of the recording should be lodged with the Shore School Archives (and/or Library), the North Sydney Council library and with the Heritage Council of NSW.

Fabric or elements can reveal an important story and therefore any changes to Graythwaite should be carefully recorded. Copies of the recording should be distributed to appropriate repositories to ensure that they are readily accessible and to guard against loss.

6.2.6 Stakeholder and Community Engagement

- Policy 13 Key stakeholders and the local and wider community should be consulted as appropriate in the ongoing management of the heritage significance of Graythwaite. The particular interests and concerns of the community should be considered and incorporated, where it can be accommodated within the operational needs of the school.
- Policy 14 Where appropriate the Shore School should consider holding periodic open days at relevant times of the year.
- Policy 15 An ongoing program of community consultation in relation to the heritage significance of the Graythwaite site should be investigated. This could include inviting relevant people to events such as periodic open days.

The local and wider community have a keen interest in the future of Graythwaite. The awareness of its heritage significance can be increased over time. The key stakeholders and community groups are identified in Section 5.8 of this CMP.

6.2.7 Assessing Heritage Impacts

Policy 16 Proposals for change at Graythwaite should be subject to an assessment of the potential impacts (both adverse and positive) on the heritage significance of the place. The heritage impact assessments/statements should be undertaken in accordance with Heritage Council of NSW guidelines and use appropriate heritage management expertise. They should also include appropriate consultation with North Sydney Council and the Heritage Council.

Any proposals for Graythwaite should be assessed to ensure that they are consistent with the management recommendations contained within this CMP. The assessment should include an assessment of the potential impacts on the heritage significance of the place.

6.2.8 Statutory Compliance

- Policy 17 Development consent for all works at Graythwaite should be sought in accordance with relevant statutory planning instruments.
- Policy 18 Negotiations should occur with the Heritage Council of NSW to establish site-specific exemptions from the need to gain approval for certain works under the Heritage Act. Where appropriate, Shore should seek the assistance of the Heritage Council in any North Sydney Council approval process to give effect to the exemptions.
- Policy 19 Negotiations should occur with North Sydney Council with possible input from the Heritage Council of NSW to confirm the type and extent of works that may be exempt under the LEP.

Graythwaite is a place of State and local heritage significance and is therefore subject to the heritage provisions contained within the *Heritage Act 1977* (NSW) and the *North Sydney Local Environmental Plan 2001* (LEP). See more information at Section 5.6 of this CMP. A number of standard exemptions from the need to gain approval for certain works under the Heritage Act apply. A number of additional site-specific exemptions may also apply subject to approval from the Heritage Council of NSW. Recommended exemptions have been included at Appendix E of this CMP. Clause 12 of the LEP also provides for exemptions to undertake certain works without requiring approval under the LEP subject to agreement with North Sydney Council.

6.3 Heritage Conservation

6.3.1 General

Policy 20 Heritage conservation at Graythwaite should:

- adopt a holistic approach and extend to all significant aspects of Graythwaite (as
 defined in Section 4 of this CMP), including cultural landscape features, buildings
 and structures, collections, records, traditions, practices, memories, meanings and
 associations;
- aim to retain significant components, spaces, elements and fabric of the place consistent with their assessed level of significance and in accordance with specific actions identified within this CMP;
- make use of all available expertise and knowledge and will adopt an evidencebased approach to materials conservation; and
- ensure that the authenticity of original elements and fabric is maintained.

The Assessment of Heritage Significance in Section 4 sets out why Graythwaite is of heritage significance. It is the aim of this CMP to guide retention and conservation of its key components and significant spaces, elements and fabric while allowing for its use as part of the Shore School campus. The existing built and landscape elements, spaces, components and fabric of the place as well as the potential archaeological resource predominantly relate to the Dibbs family and Australian Red Cross Society phases. It is the retention, conservation and interpretation of these phases, and earlier phases of the site, where present, that should form the focus for heritage management.

The elements, spaces, components and fabric of the place should be managed according to the contribution that they make to the heritage significance of the place—see guidance below.

Significance	Recommendations for Management
Exceptional	Retain, conserve (restore/reconstruct) and maintain. Intrusive elements and fabric should be removed. Adaptation is appropriate provided that it is in accordance with The Burra Charter principles and with the specific guidance provided in this CMP.
High	Retain, conserve (restore/reconstruct) and maintain. Intrusive elements and fabric should be removed. Adaptation is appropriate provided that it is in accordance with The Burra Charter principles and with the specific guidance provided in this CMP. There is generally more scope for change than for components of exceptional significance.
Moderate	Retain, adapt and maintain. Demolition/removal is acceptable provided that there is no adverse impact on the heritage significance of the place. Retention in some cases may depend on factors other than assessed heritage values, including physical condition and functionality.
Little	Retain, alter or demolish/remove as required provided that there are no adverse impact on the heritage significance of the place. Sensitive alteration or demolition/removal may assist with enhancing the heritage significance of components of greater heritage significance.
Intrusive	Demolish/remove when the opportunity arises while ensuring that there are no adverse impacts on the heritage significance of other more significance components. Components that are actively contributing to the physical deterioration of components, spaces, elements and fabric of higher significance should be removed as a priority.

6.3.2 Aboriginal Heritage

- Policy 21 An understanding of the Aboriginal occupation of the Graythwaite site should be incorporated into site interpretation consistent with the interpretation policy recommendations contained in Section 6.4 of this CMP.
- Policy 22 Should excavation, ground disturbance or vegetation removal within the less developed areas of the site, to the south and west of the House, be proposed, then the Metropolitan Local Aboriginal Land Council (MLALC) should be contacted and opportunities provided for a representative to monitor the work.
- Policy 23 Should previously unidentified Aboriginal objects (or potential objects) be discovered during excavation, ground disturbance or vegetation removal then all works should cease immediately and the Cultural Heritage Division of DECCW informed. Depending on the outcomes of discussions with DECCW, the MLALC may also need to be informed.

The Aboriginal heritage assessment found that Graythwaite does not feature any known Aboriginal sites nor is it considered to have potential to contain previously unidentified sites. The site is also not considered to have any Aboriginal heritage significance. Nevertheless, the Metropolitan Local Aboriginal Land Council (MLALC) has expressed an interest in monitoring any excavation, ground disturbance or vegetation removal in the less disturbed areas to the south and west of the House.

Graythwaite is also subject to the provisions of the *National Parks and Wildlife Act 1975* (NSW). The Director-General of the NSW Department of the Environment, Climate Change and Water (DECCW) is responsible for the protection and care of Aboriginal places and objects throughout NSW.

6.3.3 The Cultural Landscape

- Policy 24 Retain an understanding of the original residential nature of Graythwaite while acknowledging its long-term institutional function.
- Policy 25 The physical and visual character of the significant cultural landscape at Graythwaite (as identified in Section 4 of this HMP) should be maintained by:
 - retaining and conserving original fabric and fabric from the late Victorian and Federation periods;
 - providing an appropriate setting for the House Complex reflecting its location, scale and massing;
 - retaining and conserving the balance of grassed open space and paved open space with areas of mass planting largely represented by informal copses of trees dominated by Ficus species;
 - retaining the made landform of generally grassed terracing with mass planted embankments.
 - limiting mass plantings to the steep slopes and generally small areas of land; and
 - extending grassed surfaces to open up spaces and improve ease of connectivity throughout the property.
- Policy 26 The character of the remnant tree planting associated with the Dibbs family in the late Victorian period and Federation period (1871-1915) should be retained and conserved together with the grassed terraces and former remnant orchard paddock.
- Policy 27 Significant landscape features, including pathways, gardens and the existing alignment of the entry driveway from Union Street should be retained and conserved.
- Policy 28 Recognise the property as a site with panoramic views over Sydney Harbour to the south. Opportunities to re-instate original/early views and vistas to and from the site particularly from Union Street and from the upper level of the site should be considered. Removal of weeds and some later plantings to restore significant views and vistas from the house to the south and southwest is envisaged.
- Policy 29 Should any significant plantings need to be removed on safety grounds then replacement planting should interpret the form and character of the original plantings.

For a long period of its history Graythwaite has been used for institutional purposes, and this will continue into the foreseeable future. Notwithstanding its function, the robust, nineteenth century character of the House, its outbuildings and landscape predominates, and a sense of the original grand residential nature of the place should be retained and conserved.

The cultural landscape of Graythwaite retains evidence of all phases of its development and is a good example of a relatively large and relatively intact nineteenth century residential allotment surviving in the twenty-first century urban character of North Sydney.

The site has an institutional parkland character featuring a terraced landform and umbrageous tree canopy planting character dominated by Fig trees of various species and punctuated by pines and areas of grassed open space.

The conservation strategy for Graythwaite should retain and enhance the elements of the cultural landscape developed during the Late Victorian and Federation periods, while also retaining discrete remnants of later periods of development.

6.3.4 Existing Buildings and Structures

The House

- Policy 30 The House is a component of Exceptional heritage significance and should be retained and conserved. Of particular importance are:
 - the external form and architectural detailing of the house as presented to the Garden (east, south and west elevations);
 - the external form and architectural detailing of the house as presented to the Service Courtyard (north elevation). Reconstruction of missing/altered elements and fabric should be undertaken when the opportunity arises;
 - the external form and architectural detailing of the roof of the house. The pre-1916 form of the roof should be reconstructed when the opportunity arises; and
 - the façade stonework and ironwork. The fabric should be retained intact and maintained in accordance with this CMP. New stones should be selected for their durability and good colour and texture match. Samples should be used to confirm their compatibility prior to final selection.
 - the historic layout of the living rooms and bedrooms, which are largely intact.
 - original/early internal fittings of the House to continue to demonstrate evidence of its historic associations;
 - window and door hardware and furniture installed prior to the 1910s;
 - the fireplace surrounds;
 - evidence of the system of servant bells; and
 - evidence of the Red Cross era, where possible, and where it would not impact elements, spaces or fabric of greater significance.

The exteriors of the House on its principal (garden) frontages and roofscape have been adversely impacted and so measures should be implemented to remove the largely post-1980 alterations and return them to a more significant earlier form. The roof has also been adversely affected by a number of *ad hoc* alterations that have created an unsympathetic element when viewed from the garden and surrounding buildings. The greatest change occurred on the courtyard elevation with construction of the Lavatory/Bathroom Block in 1915/16. This addition has been assessed as being of Little heritage significance and its removal or modification is considered desirable as it would reduce the adverse impact on the overall significance, aesthetic quality and functioning of the courtyard and the House.

The remnant fittings of the interiors of the House demonstrate the lifestyle of the Dibbs family and the role of the benefactors in 1915/16 that funded the Red Cross. The range of fittings include the fireplaces, overmantels, window and door hardware, servant pushes, a fitted cupboard on the first floor, and the benefactor signs on the doors on the ground and part first floor.

Policy 31 A co-ordinated approach to the colour and finishes of the walls, ceilings and joinery of the main rooms of the House should be implemented.

There is evidence of painted wall and ceiling decoration and varnished joinery in the living rooms, entry hall and main bedrooms from the Dibbs era. The painted schemes appear to have been initially retained by the Red Cross for an indeterminate period of time. Painted and varnished surfaces are vulnerable to wear and will need to be repainted when the need arises.

Policy 32 Flooring originally intended to be visible should be retained, conserved and remain accessible to view. Removal of later, less significant floor finishes, such as carpets or linoleum should also be undertaken to assist with identification and conservation of other areas of significant flooring.

Some rooms on the ground floor have floor finishes of particular significance. This includes the parquet flooring in the former dining room/ball room (Room G6) and the encaustic tile floor in the entry hall (Room G5/G13). Other ground floor rooms may prove to have parquet flooring with further investigation. These floor finishes were intended to be seen.

The Kitchen Wing

- Policy 33 The Kitchen Wing is a component of Exceptional heritage significance and should be retained and conserved. Of particular importance are:
 - the external form and architectural detailing of the Kitchen Wing as presented to the Garden (east, north and south elevations);
 - the external form and architectural detailing of the Kitchen Wing as presented to the Service Courtyard (west elevation). Reconstruction of missing/altered elements and fabric should be undertaken when the opportunity arises;
 - the external form and architectural detailing of the roof of the Kitchen Wing. The pre-1916 form of the roof should be reconstructed when the opportunity arises; and
 - the façade stonework. The fabric should be retained intact and maintained in accordance with this CMP. New stones should be selected for their durability and good colour and texture match. Samples should be used to confirm their compatibility prior to final selection; and
 - the historic upper floor layout, which is largely intact.

The exterior of the kitchen wing is largely intact and should not be altered beyond conservation works. Adaptation to suit new uses where this does not impact significant fabric is acceptable.

The Stables Building

- Policy 34 The Stables Building is a component of Exceptional heritage significance and should be retained and conserved. Of particular importance are:
 - the external form and architectural detailing of the Stables Building as presented to the Garden (east, north and west elevations);
 - the external form and architectural detailing of the Stables Building as presented to the Service Courtyard (south elevation). Reconstruction of missing/altered elements and fabric should be undertaken when the opportunity arises;
 - the external form and architectural detailing of the roof of the Stables Building; and
 - the upper floor layout; and
 - the façade stonework. The fabric should be retained intact and maintained in accordance with this CMP. New stones should be selected for their durability and good colour and texture match. Samples should be used to confirm their compatibility prior to final selection.
- Policy 35 The west and south walls of the Stables Building should be restored and/or reconstructed when the opportunity arises.

The Stables Building is understood to be one of the earliest remaining structures in the North Sydney area. Its conservation and restoration is therefore important. The west and south walls of the building have been altered.

The Massage Room/Doctors Room and Link

- Policy 36 The Massage Room/Doctor's Room may be retained, adapted or demolished as necessary.
- Policy 37 Adaptation of the building for a new use should include retention of its overall form as well as evidence of its former fabric, in particular its ceiling.
- Policy 38 Demolition of the building is acceptable provided that it:
 - would not result in any damage to the adjacent stables building, which is a building
 of exceptional heritage significance; and
 - is preceded by an archival recording consistent with the policies at Section 6.2.5.
- Policy 39 Demolition of the Link should be undertaken when the opportunity arises. Demolition should ensure that elements, spaces and fabric of heritage significance are not damaged.

The Massage Room/Doctor's Room is of Moderate heritage significance for its contribution to the function of Graythwaite as a convalescent home and hostel. The Link is an intrusive element of no architectural merit that impacts the heritage significance of other components, elements, spaces and fabric.

The Coach House

Policy 40 The Coach House is of High heritage significance and should be retained and conserved. Some adaption is possible to accommodate new uses.

The Tom O'Neill Centre

- Policy 41 The Tom O'Neill Centre may be retained, adapted or demolished as necessary.
- Policy 42 Adaptation of the building for a new use should include retention of its overall form and external character. The interior has been sufficiently altered over time as to make further changes acceptable.
- Policy 43 Demolition of the building is acceptable provided that it is preceded by an archival recording consistent with the policies at Section 6.2.5. Any replacement building should be of a similar footprint and volume as the existing building.

The Tom O'Neill Centre is of Moderate heritage significance for its contribution to the function of Graythwaite as a convalescent home and hostel.

The Ward Building and Link

- Policy 44 The Ward Building may be retained, adapted or demolished as necessary.
- Policy 45 Adaptation of the building for a new use should include retention of its overall form. It is noted that the original planning has been altered and virtually every finish has been replaced. Accordingly, further internal adaption is acceptable.
- Policy 46 Demolition of the building is acceptable provided that it is preceded by an archival recording consistent with the policies at Section 6.2.5. New buildings on this site will need to have a carefully considered relationship with both Graythwaite House and the Shore School buildings.
- Policy 47 Demolition of the Link should be undertaken when the opportunity arises. Demolition should ensure that significant elements, spaces and fabric of the House are not damaged.

The Ward Building is of Moderate heritage significance for its social history and related contribution to the function of Graythwaite as a convalescent home and hostel. The Ward Building has been substantially altered over time and is of no architectural merit. The Link is also an intrusive element of no architectural merit that directly impacts the heritage significance of the House.

The 2003 CMP notes that the Ward Building and Link do not make a positive contribution to either Graythwaite or the Shore School and can be replaced.

6.3.5 Historical Archaeology

Policy 48 Where possible, proposed excavation or ground disturbance at Graythwaite should be kept to a minimum and located away from areas that have identified potential to contain historical archaeological resources. (It is noted that any new buildings will require excavation.)

- Policy 49 All proposed building works or landscaping which involve excavation or ground disturbance at Graythwaite should be preceded by an assessment of its potential to impact the site's historical archaeological resource.
- Policy 50 Where impacts to the potential historical archaeological resource are unavoidable then an application to disturb 'relics' should be submitted to the Heritage Council of NSW as required under the provisions of the Heritage Act 1977 (NSW).
- Policy 51 All archaeological investigation, recording, artefact cataloguing and reporting should be undertaken by a qualified archaeologist and in accordance with best-practice principles and consistent with relevant Heritage Council of NSW policies and guidelines.
- Policy 52 Any artefacts found during excavation, ground disturbance or archaeological excavation should be appropriately bagged, labelled, catalogued and stored in archive boxes. The artefacts should be provided to Shore School who will need to provide an appropriate repository once reporting has been finalised.
- Policy 53 Artefacts should be stored in a secure and weathertight location at Graythwaite, consistent with best-practice principles. Accommodation of artefacts should therefore be incorporated into any proposed redevelopment of Graythwaite.
- Policy 54 The findings of any archaeological assessments and research designs and/or the results of archaeological investigations should be incorporated into site interpretation.
- Policy 55 Where previously unidentified substantial intact archaeological relics of State or local significance are uncovered during excavation, work in the vicinity must cease immediately and the Heritage Council of NSW notified. Work should not proceed until approval to do so has been provided by the Heritage Council of NSW or its delegate.

The potential historical archaeological resource of Graythwaite largely consists of sub-surface remains of outbuildings, ground surfaces, features, artefacts and pits associated with early occupation of the site in areas to the north, east and west of the House. In addition, the remains of a cistern/reservoir are known to survive on the central terrace to the southwest. Other remains may include the vineyard and orchard and the air raid shelter on the lower terrace near Union Street. The potential remains are of local heritage significance for their ability to provide information on occupation of the site up until the early 1900s, in particular, efforts to provide a self-sufficient lifestyle in an isolated locality.

Future uses of Graythwaite are likely to require excavation for remediation, construction of new buildings and site infrastructure and landscaping. Such works have potential to impact remnant historical archaeological resources and should therefore be managed to avoid, minimise or mitigate impacts as much as possible. Where excavation or ground disturbance is unavoidable then it should be undertaken in such a way as to improve the understanding of the history and heritage of the site.

As a place of State heritage significance, historical archaeological relics at Graythwaite are protected under the *Heritage Act 1977* (NSW). Any proposed excavation or ground disturbance will therefore require approval under the Act. If the works are minor then they may be undertaken under a standard exemption subject to Heritage Council approval. See Section 5.6.1 for further information. An application for approval to disturbed relics will need to be accompanied by a Research Design which sets out the reasons for the impacts and an appropriate methodology to mitigate these impacts. The Research Design should identify appropriate excavation or ground disturbance methodologies to further minimise or mitigate impacts. The Research Design may identify the need for archaeological investigation such as, test excavation, detailed excavation and monitoring. The results of any investigation will need to be documented and reported to the Heritage Council.

6.3.6 Salvaged Materials

Policy 56 A comprehensive survey of Graythwaite should be undertaken to identify salvaged materials. Any materials that have potential to assist with the repair or reconstruction of significant fabric should be retained and stored in a weathertight secure location.

Graythwaite retains some potential significant elements—joinery and ironwork—from the Dibbs period of occupation that have been subsequently removed and stored on site. These elements should be considered by the architect responsible for any proposed works as they have the potential to be reinstated in full or to assist with repairs and/or reconstruction of significant earlier elements.

6.3.7 Moveable Heritage

Policy 57 A comprehensive survey of Graythwaite should be undertaken to determine if any movable items of potential heritage significance have been retained. Any identified items of potential moveable heritage significance should be retained in a weathertight and secure location and subject to a heritage significance assessment.

Graythwaite appears to retain few, if any, items of potential movable heritage significance. Nevertheless, there may be some items remaining that could assist with interpretation of the site's history and heritage.

6.4 Interpretation

- Policy 58 Interpretation of the heritage significance of Graythwaite should be undertaken in accordance with an interpretation plan prepared for the place.
- Policy 59 The interpretation plan should be based on sound and up-to-date knowledge of the heritage significance of Graythwaite. It should be reviewed and evaluated within a five year period as part of the review and evaluation of the CMP.
- Policy 60 Measures to enhance interpretation of the heritage significance of Graythwaite should be incorporated into proposals for change at the site based on the concepts and strategies contained within an interpretation plan. These concepts and strategies should also form part of any decision about future uses for the place and potential redevelopment.
- Policy 61 Interpretation should seek to communicate with a wide variety of people through a range of communication methods, responsive to the needs of potential audiences within the Shore School and within the local and wider community.
- Policy 62 Given the security and operational requirements for a school, controlled public access to Graythwaite and its significant components should be carefully resolved.

Interpretation of the heritage significance of Graythwaite is an important conservation action. The full range of the place's heritage significance is not always readily apparent and should be explained through effective interpretation.

Interpretation of Graythwaite should aim to communicate its heritage significance to the staff and students of the Shore School and to the local and wider community. This could be done through a range of interpretive measures.

6.5 Cleaning, Maintenance and Repair

6.5.1 Buildings and Structures

- Policy 63 Cleaning, maintenance and repair at Graythwaite should be undertaken on an ongoing basis. The works should:
 - aim to protect fabric from further deterioration and retain as much as possible the integrity of significant fabric and construction methods;
 - be consistent with the Burra Charter principles and aim to do 'as much as necessary but as little as possible'—this would include retaining significant fabric where possible rather than replacing elements in full; and
 - be undertaken by staff or contractors experienced in working with historic fabric and using appropriate techniques.
- Policy 64 Adequate funding and other necessary resources for ongoing cleaning, maintenance and repair should be provided by the Shore School.
- Policy 65 A cyclical maintenance program should be prepared and implemented to provide the basis for the ongoing care of Graythwaite and to retain and enhance its heritage significance. The program should be consistent with the guidelines prepared by the Heritage Council of NSW.
- Policy 66 Repair work should be undertaken regularly to maintain the condition of significant fabric between maintenance cycles. Minor repairs should be undertaken promptly to avoid damage to other fabric.
- Policy 67 Repairs involving new work should take care to retain (through restoration and/or reconstruction) original/early detailing and features of particular interest.
- Policy 68 Missing or damaged concrete, rendered masonry and brickwork should be repaired or reconstructed to match the original and a suitable mortar and/or render type used. All visible new surfaces must visually match the existing/original in colour and texture.
- Policy 69 Repairs of significant roofing materials should involve removal of as little fabric as necessary. Damaged roof slates or corrugated metal sheeting should be repaired where possible by replacing missing or damaged elements individually. The colour, texture and form of significant roofs must be replicated if major replacement is required.
- Policy 70 Repairs to metal flashings and guttering/downpipes may involve replacement of large amounts of original fabric. The original material, colour and profile of guttering and downpipes should be replicated where known.
- Policy 71 All maintenance and repair should be recorded consistent with the policies contained in Section 6.2.5 of this CMP.

Ongoing cleaning, maintenance and repair at Graythwaite are required to offset deterioration of its significant fabric. This is best achieved by preparing and implementing a program of regular cleaning, maintenance and repair. As a place of State heritage significance, Graythwaite is also subject to requirements under the *Heritage Act 1977* (NSW) to meet specified minimum standards of maintenance and repair.

6.5.2 Cultural Landscape Features

- Policy 72 Cleaning, maintenance and repair of the cultural landscape and its significant features should aim to retain the landscape character of the place developed during the occupation of the site by the Dibbs family.
- Policy 73 A landscape maintenance plan should be prepared for the entire Graythwaite site. The maintenance plan should include regular inspections of the grounds and the removal of weed growth and structurally unstable shrubs and trees.

6.6 Site Redevelopment

As outlined in Section 5 of this CMP, the purchase of the property by Shore provides opportunities to enhance and expand its school facilities in the short to longer term. Accepting that Graythwaite is to be adapted for school uses, the following policies provide guidance for future development to ensure that its heritage significance is maintained whilst accommodating the School's needs.

The House is to be used for reception and administrative roles for the School. Typical school uses are not proposed in Graythwaite House or the Coach House.

The following policies should be considered by the School when changes are proposed for Graythwaite, its buildings and landscape, including the construction of new buildings.

6.6.1 Masterplanning

- Policy 74 Masterplanning should be undertaken for the whole of the Graythwaite site to guide future development in the short to longer term. Masterplanning should:
 - include the restoration and reconstruction of the house complex and coach house as a priority;
 - retain the significant built form and landscape elements of the site;
 - guide the removal of intrusive fabric and elements;
 - propose new development which is consistent with the redevelopment policies identified above; and
 - provide for the cyclical maintenance of the buildings and landscape, including key landscape vistas.

Any new buildings or works proposed for Graythwaite should be considered in the context of the whole site, having regard for the redevelopment policies identified above. The purpose of masterplanning is to provide consistent and integrated development which ensures the significance of Graythwaite is not eroded by incremental or piecemeal change. It is noted that such Masterplanning will, over time, integrate with the adjoining features of the Shore School.

A masterplan should be reviewed regularly or whenever significant change to the functional needs of the school occurs.

6.6.2 Adaptive Re-use

- Policy 75 The long-term management of Graythwaite including its adaptation for new uses should take into account its importance as a place of State heritage significance. All decisions should consider and seek to retain the heritage values of the place as identified in Section 4 of this CMP.
- Policy 76 Future uses for Graythwaite should be consistent with the following:
 - new uses should be compatible with the nature and significance of the place and its significant components;
 - new uses should be selected on the basis that they 'fit' the existing spaces within significant buildings and structures. Substantial alteration and/or removal of significant fabric to suit the requirements of a new use should be avoided;
 - future adaptation of the interiors of significant buildings and structures should ensure that original spaces, elements and fabric are retained and conserved;
 - the detailed requirements of future new uses should not require undue changes to the significant spaces, elements and fabric that cannot be reversed;
 - future subdivision of internal spaces, where appropriate, should be undertaken in a 'subservient' manner, using partitions that can be easily removed and which would not impact the existing significant wall, ceiling and floor finishes;
 - external alterations to significant buildings and structures to suit new uses must avoid adverse visual and physical impact. Minor changes to meet access and other functional requirements, are likely to be permitted provided that these are subservient to the primary architectural features of the building or structure; and
 - external alterations to the rear (north) side of the House, within the Service Yard requires the restoration/reconstruction of the rear elevation of the House. The introduction of a new lift and some adjustment of floor levels is required for disabled access; the design and materiality of the lift, while modern, is to respect the architecture of the House, Kitchen Wing, Stables Building and Service Yard.

6.6.3 Alterations and Additions

- Policy 77 Alterations and additions at Graythwaite should be consistent with the following principles:
 - new additions to significant buildings and structures should be designed to respect and enhance the heritage significance of the affected building or structure and the Graythwaite site as a whole;
 - the siting and form of additions should respect the established planning principles of significant buildings and structures;
 - new additions should facilitate the ongoing use of significant buildings and structures rather than render them obsolete;

- new additions should complement the style, form, proportions, materials and colours of the significant building or structure;
- new additions should be of sympathetic contemporary architectural design, detailing and materials and should not be imitations of the existing building or structure; and
- the quality of the architectural resolution, detailing and materials of the new addition should be as high as that of the existing significant building or structure.

Policy 78 Any additions to significant buildings and structures or new buildings at Graythwaite should:

- have sufficient setback (design relationship) to allow appreciation of significant facades and envelopes and ensure that significant buildings and structures retain their sense of separation or connection;
- respond to the original design and program of significant buildings and structures within their setting;
- retain and enhance the significant views of the house and associated buildings from the driveway and central terrace;
- remove the clutter of obsolete services from significant buildings and structures to enhance the appreciation of their external form;
- re-instate the original/early functioning of the house and associated outbuildings;
- re-active the internal functioning of significant buildings and structures;
- allow for the re-instatement/reconstruction of the window on the main stair;
- retain the structural integrity of significant buildings and structures; and
- not require additional support from within significant buildings or other structures.

Design studies for the appropriate adaptation of the significant buildings and structures at Graythwaite have been undertaken. These have informed other studies to determine the most appropriate location and design for new buildings.

6.6.4 The House Complex

Policy 79 Maintain an understanding of the House as a detached building.

Designed as a free-standing building, an important characteristic of Graythwaite is its villa form with principal elevations to the south, east and west. Notwithstanding minor additions and accretions and removal of the widow's walk, its overall exterior form and appearance remains largely intact. Additions or new buildings should not obscure or detract from the original facades and presentation of the House as a free-standing building.

Policy 80 Retain an understanding of the House as the central focus of the Graythwaite Lands.

The House has always been the central focus of the property. Any additions to the House or new buildings should be deferential in character, scale and appearance to the House.

Policy 81 No new structures or landscape elements should be erected in the vicinity of the House Complex which will have an adverse impact on its setting and on identified views to and from the complex.

Primary views of the House to be maintained are those from Union Street (presently obscured by vegetation) and from the middle terrace. Vistas from the House and site to be maintained include the panoramic views over Sydney Harbour to the south.

Policy 82 Retain the landscaped setting of the House including individually significant plantings, landscaped areas and spatial structure. Removal of weeds and some later plantings to restore significant views and vistas from the House to the south and southwest is envisaged.

The landscaped character of Graythwaite comprises parkland with umbrageous tree canopies forming extended copses relating strongly to man-made landform garden areas, associated with the occupation of the property by the Dibbs family. Any new development on the site should maintain and enhance the landscaped environs of the House and retain the overall significant landscape and open spatial areas of Graythwaite. New development should be located where its visibility from public places (ie Union Street) is reduced, to minimise visual impact on the significant buildings and landscape. Scope for sensitive new development is indicated in Figure 6.1 and Figure 6.2 and includes the following areas:

6.6.5 North-west area

Policy 83 New development within the northwest area is acceptable provided that:

- the height of new buildings does not exceed the height of the first floor cornice moulding of the House (the exterior moulding approximately in line with the first floor level of the House)—refer to Figures 6.1 and 6.2;
- new buildings do not project forward (south) of the western bay window of the House;
- an appropriate curtilage (and setting) is maintained around the Coach House; and
- new buildings are sited clear of the canopy and root zones of significant trees on the site boundaries and on the terraced embankment.

The visual impact of new development on this part of the site is minimised by the fall in topography and distance from the House. Important considerations for new development include maintaining sufficient curtilage around the Coach House and clearance from the canopy and root zones of significant trees along the boundaries and terraced embankment.

As this area of the site has been assessed as being of Little or no heritage significance, scope exists for sub-surface excavation and development—underground development could feasibly extend into the area between the Coach House and the Tom O'Neill Centre.

6.6.6 Area between the Coach House and the House

- Policy 84 No major new development should occur between the Coach House and the House.
- Policy 85 Should the Tom O'Neill Centre be proposed to be demolished then any new building should be single-storey in height and sited in the same or similar location and have a similar general footprint—see Figures 6.1 and 6.2.
- Policy 86 The view of the southern gable end of the Coach House from the southeast along the drive to the House is to be retained.

It is preferable that no major new development occur in this area. Historically, from the 1860s a small formal garden with an axial arrangement of paths existed immediately to the west of the House, with sundry outbuildings located further west. A memory of the earlier formal garden presently exists in the layout of garden beds and paths, bounded on one side by the Tom O'Neill Centre.

Identified as being of Moderate heritage significance, scope exists for the creative adaptation of the Tom O'Neill Centre, which would be preferred to its demolition.

6.6.7 Area to the east of the House Complex

- Policy 87 New development to the east of the House Complex should be consistent with the policies for new development contained within Section 6.2.2 of this CMP and:
 - sited to retain the primary vista of the House from the entry driveway;
 - deferential in scale and height to the House Complex;
 - designed to respect and complement the House complex in its character, scale, form, siting, use of materials and colour and architectural detailing.

The Ward Building presently obscures a primary view of the House from the driveway. Notwithstanding its historical and social significance, the aesthetic significance of the hospital-period building is low and the integrity of its fabric poor. Its demolition would provide an opportunity to restore the House as the primary visual focus from the driveway, re-opening a lost view of its eastern elevation in particular. If the Ward Building is demolished, then scope exists for sensitive new development within the area provided that any replacement structure(s) conform to the policies for alterations and additions and for new buildings contained in Section 6.2.2 of this CMP.

6.6.8 Area to the north of the House Complex

- Policy 88 New development within the area to the north of the House Complex should be consistent with the policies for new development contained within Section 6.2.2 of this CMP and:
 - allow sufficient separation from the House Complex, including the Kitchen Wing and Stables Building to enable the House Complex to continue to be understood as a distinct detached form;
 - be no more than two storeys in height;

- be designed to respect and complement the House Complex in its character, scale, form, siting, use of materials and colour and architectural detailing; and
- does not negatively impact significant trees in the vicinity.

Typical of nineteenth century dwellings, the rear elevation of the House Complex presents as an *ad hoc* composition rather than a purposeful architectural statement, and the immediate environs to the north has been altered by the introduction of asphalt paving. Accepting the more utilitarian nature of this part of the site, scope exists for a small new building in the rear service courtyard.

6.6.9 Integration of Graythwaite and Shore School

Policy 89 Subdivision of the Graythwaite site for sale to others should not occur; considered integration with the Shore School site is presumed.

Graythwaite is located in an institutional/suburban setting representative of the development undertaken in the North Sydney area since the 1870s. The large size of the landholding is unusual in the older established suburbs of Sydney. The land holding is historically significant as it represents both a close approximation of the site boundaries of the Dibbs era and is the area gifted to the State.

In addition, the current extent of the Graythwaite site has been identified as its heritage curtilage. This curtilage is attached to the State Heritage Register (SHR) listing for Graythwaite and therefore has legal standing under the provisions of the Heritage Act—refer to Figure 5.1 of this CMP.

The Shore School, Graythwaite Lands and Kailoa (on Union Street) incorporate a number of significant Dibbs and Holtermann residences and a sense of the open space that existed in nineteenth century North Sydney. With the School use of both sites, new access routes will link the combined sites and it is likely that various School buildings will be extended across Graythwaite's northern and eastern common boundaries with the School.

6.6.10 Demolition/Removal

- Policy 90 Demolition/removal of buildings and structures that make a High or Exceptional contribution to the heritage significance of Graythwaite (primarily the House, Kitchen Wing, Stables Building and Coach House) should not occur.
- Policy 91 Demolition/removal of buildings and structures that make only a Little or Moderate contribution to the heritage significance of Graythwaite may occur provided that there is no substantial adverse impact on the heritage significance of the site.
- Policy 92 Demolition/removal of intrusive buildings or structures is encouraged and should occur when the opportunity arises.
- Policy 93 The impacts associated with demolition/removal should be assessed in conjunction with the impacts associated with replacement development. The combined impacts should be considered when determining the overall impact of a proposal.
- Policy 94 Demolition/removal should be preceded by an archival recording consistent with the recommendations for archival recording at Section 6.2.5 of this CMP.

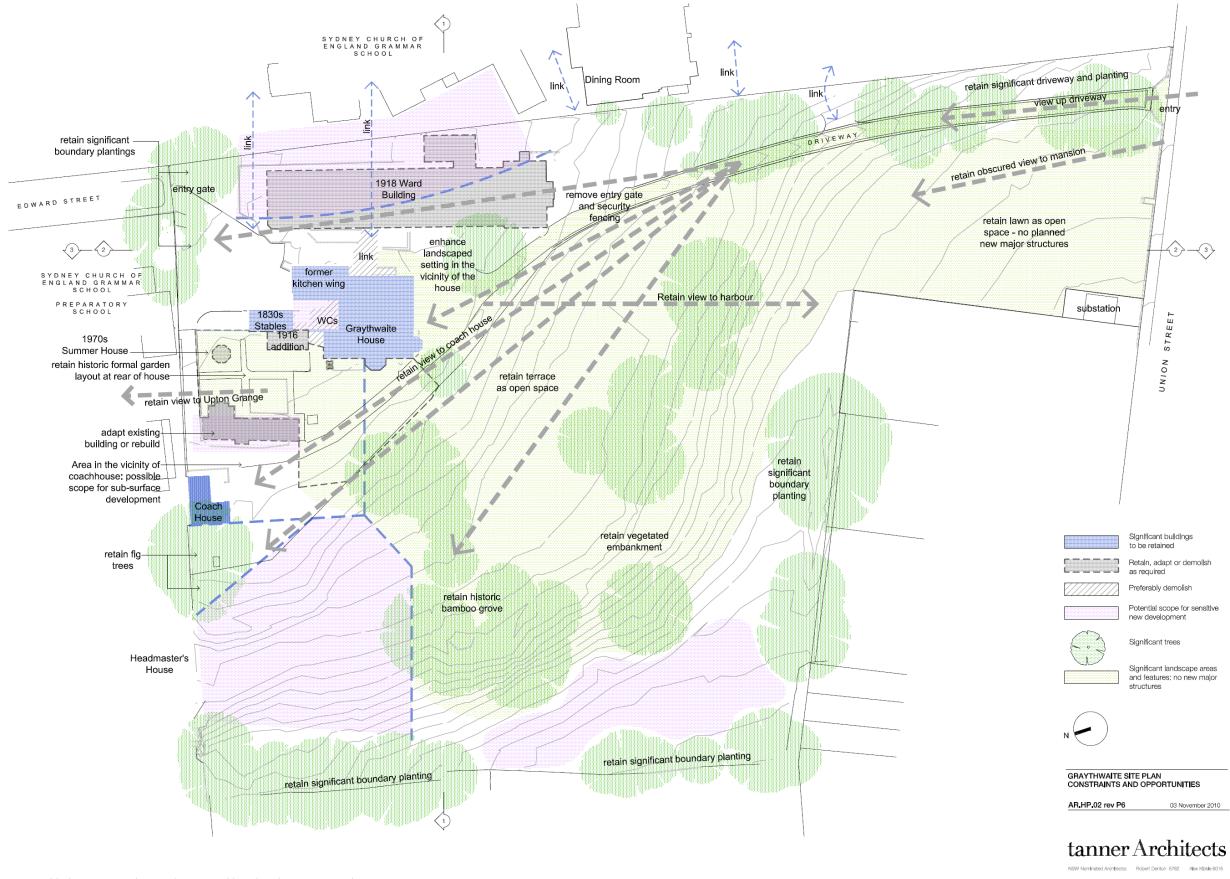
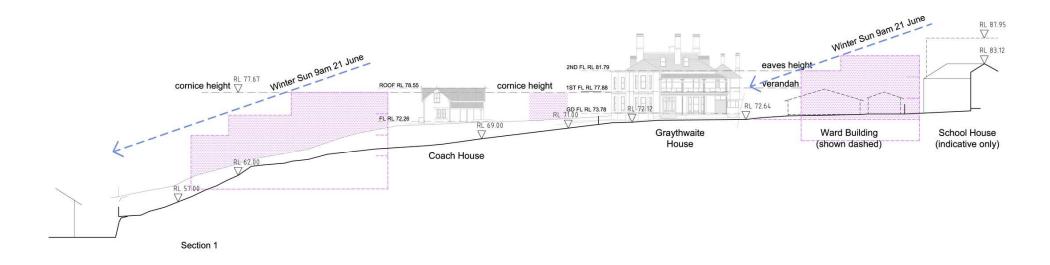
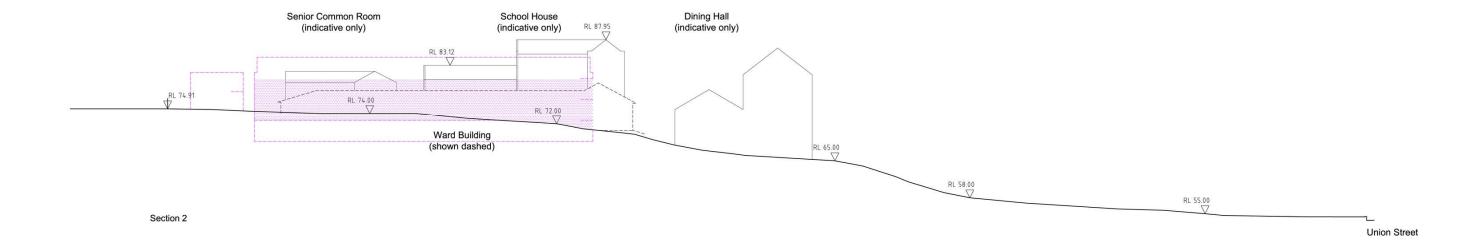


Figure 6.1 Heritage constraints and opportunities site plan, not to scale.





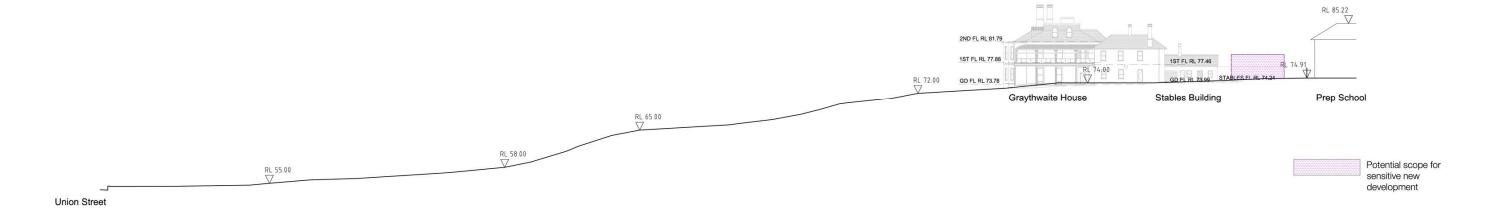


Figure 6.2 Heritage constraints and opportunities section diagram, not to scale.

Section 3

6.6.11 New Landscaping

- Policy 95 New landscaping should be consistent with the objective of maintaining a balance of open space with detail garden areas associated with the House Complex to interpret the landscape setting during the Dibbs family occupation of the site.
- Policy 96 The wider setting of Graythwaite should be considered in the future planning of new works. This is particularly relevant for the 'borrowed' landscape of the adjacent Shore School lands including existing built forms, open space and vegetation. Trees planted in the late Victorian and Federation periods within the School grounds also contribute to the strong visual and associational relationship between the two places.
- Policy 97 Adaptation may be possible provided that the overall heritage significance of Graythwaite is not adversely impacted and provided that appropriate recording and interpretation is undertaken.
- Policy 98 North Sydney Council's Significant Tree Register should be consulted as part of any proposal for changes to the landscape at Graythwaite.
- Policy 99 A landscape plan should be prepared for Graythwaite to provide an appropriate setting for the House and associated buildings. The landscape plan should:
 - aim to enhance the heritage significance of the cultural landscape;
 - be based on the principles of the Burra Charter and have regard for the conservation policies contained within this CMP;
 - provide recommendations based on historical and physical evidence;
 - guide restoration of the cultural landscape to its original or early known style using appropriate plantings, ground works and structures;
 - include species and planting schedules;
 - provide maintenance schedules to guide the appropriate management of the cultural landscape. The schedules should include guidelines to prevent any damage to significant fabric or landscape features; and
 - be prepared by a professional landscape consultant with experience in Late Victorian and Federation period landscapes.

6.6.12 Excavation/Ground Disturbance

- Policy 100 Excavation/ground disturbance at Graythwaite should be minimised as much as possible. Removal of large areas of soil should only be undertaken where there is no viable alternative. (It is noted that new buildings will require excavation.)
- Policy 101 Should excavation/ground disturbance be required in the vicinity of existing buildings and other structures then the works should be designed as much as possible to avoid disturbing footings and/or foundation material. This may require the services of a structural engineer familiar with the construction of historic buildings. It may also require short-term underpinning or other stabilisation methods to be put in place.

- Policy 102 Excavation/ground disturbance to the west and south of the House should also be undertaken in accordance with the recommendations for management of Aboriginal heritage contained in Section 6.3.2 of this CMP.
- Policy 103 Excavation/ground disturbance within areas of historical archaeological potential should be undertaken in accordance with the recommendations for management contained at Section 6.3.5 of this CMP.

The Graythwaite site does not contain any known Aboriginal sites or objects, however, the Metropolitan Local Aboriginal Land Council has requested that they be contacted should any excavation be proposed in the areas to the south and west of the residence.

The Graythwaite site does have potential to contain historical archaeological remains to the east, north and west of the House Complex.

6.6.13 Union Street Entry Driveway

Policy 104 The alignment and original character of the existing driveway from Union Street should be retained and conserved.

6.6.14 Car Parking

- Policy 105 The existing car parking areas to the south and east of the House Complex (including their bitumen surfaces) should be removed.
- Policy 106 Extensive car parking should not be permitted directly in front of the House.

 Opportunities should be investigated to re-instate the former turning circle in front of the House, including set-down areas.

Car parking at Graythwaite has generally been located around the House and former hospital buildings. The more recent use of the area to the front (south) and east of the House, in particular, has adversely affected the integrity of the building's original setting.

6.6.15 Services Infrastructure

- Policy 107 Where possible, obsolete services should be carefully removed to avoid damage to significant building fabric and/or landscape areas and features.
- Policy 108 Remnants of any existing services such as gas and water pipes should be recorded prior to removal consistent with the policies contained in Section 6.2.5 of this CMP.
- Policy 109 New services should be kept to a minimum and be installed in a manner that avoids or minimises impacts on significant fabric. Where possible, new services should:
 - enter buildings through existing sub-floor openings or penetrations or in the most discrete locations at the rear;
 - not extend up the external face of a building unless there is no viable alternative and where it can be located in a discrete location to the rear; and
 - be installed internally behind skirting boards or within existing conduits. New exposed conduits should not be introduced unless there is no alternative.

Policy 110 Where possible, new services infrastructure should also:

- be located underground to avoid visual impacts on the cultural landscape;
- make use of existing service trenches; and
- avoid adversely impacting significant landscape features such as paths, stairs and retaining walls.
- Policy 111 Significant landscape features, such as paths, stairs and retaining walls adversely impacted by installation of new services should be repaired or reconstructed in their original locations and to their original detail.
- Policy 112 Excavation/ground disturbance for new service trenches should also be undertaken consistent with the policies contained in Section 6.6.11 of this CMP.

Graythwaite has ageing and outdated services infrastructure. There will be an ongoing need to introduce new services to meet the technological demands of contemporary society. The upgrading of existing and introduction of new services has potential to adversely impact significant fabric and/or landscape areas and features. Excavation for service trenches may also disturb the site's historical archaeological resources.

6.6.16 Hazardous Materials Removal

Policy 113 Removal of hazardous materials from significant buildings and structures should:

- involve professional evaluation of hazardous materials undertaken at an early stage;
- include careful removal or encapsulation determined and acted upon in line with established standards. Every endeavour should be made to minimise adverse impacts on historic fabric;
- be preceded by an assessment of its potential to impact the heritage significance of the affected building or structure;
- avoid destructive investigation as much as possible. Destructive investigation should only be undertaken where there is no viable alternative. Its impact should be mitigated by minimising as much as possible the extent of fabric that is 'opened up' and by selecting the least visible area;
- avoid destructive investigation as much as possible. Destructive investigation should only be undertaken where there is no viable alternative. Its impact should be mitigated by minimising as much as possible the extent of fabric that is 'opened up' and by selecting the least visible area;
- be preceded by analysis and documentation of the materials to be replaced or removed and re-instated, consistent with the recommendations contained in Section 6.2.4 of this CMP; and
- be recorded by photographs taken before, during and on completion. The
 recording should be consistent with the recommendations for archival recording
 contained in section 6.2.5 of this CMP. The recording should documen any
 significant fabric or evidence of earlier uses of the building that may be uncovered.

- Policy 114 Where possible, hazardous materials that retain evidence of significant earlier uses of a building that cannot be found elsewhere should be encapsulated rather than removed. This approach should only be used, however, if the method of encapsulation would not result in more substantial heritage impacts.
- Policy 115 Hazardous materials and areas damaged by destructive investigation should be replaced with new fabric of the same size, shape and detail as the original using the 'like for like' principle and using the same method of installation.
- Policy 116 Should any other significant materials or elements need to be removed to allow for hazardous materials removal then they should be carefully removed and re-instated on completion of the works.

Many of the buildings and structures at Graythwaite contain hazardous materials. Further investigation (likely to be destructive in nature) and removal of hazardous materials has the potential to adversely impact the heritage significance of the affected building or structure and will therefore need to be carefully designed to avoid, minimise or mitigate adverse heritage impacts. See Section 5.3.3 for more information.

Encapsulation of hazardous materials is preferred where it retains evidence of significant earlier uses of the building that cannot be found elsewhere—for example painted signs relating to the use of the place by the Australian Red Cross Society between 1916 and 1980.

As Graythwaite is included on the State Heritage Register (SHR) any removal of fabric, will require approval under the *Heritage Act 1977* (NSW)—a Standard or Site-Specific Exemption may apply.

6.6.17 Ground Remediation

- Policy 117 Ground remediation should be preceded by sufficient research to determine as much as possible the location and extent of remediation required. The amount of excavation/ground disturbance should be minimised as much as possible. Removal of large areas of soil should only be undertaken where there is no viable alternative. It is noted that new buildings will require excavation.
- Policy 118 Significant landscape features such as paths, stairs and retaining walls adversely impacted by ground remediation works should be repaired or reconstructed in their original locations and to their original detail.
- Policy 119 Excavation/ground disturbance for ground remediation should also be undertaken consistent with the recommendations for Aboriginal heritage contained in section 6.6.11 of this CMP.

There is potential for the Graythwaite site to contain contaminated soil. Further assessment (involving soil sampling) and remediation of contaminated soil has potential to impact the heritage significance of the site and so will need to be carefully planned and implemented to avoid, minimise or mitigate adverse heritage impacts. See Section 5.3.4 of this CMP for more information.

As the site is included on the State Heritage Register (SHR) any excavation for removal of contaminated soil, will require approval under the *Heritage Act 1977* (NSW)—a Standard or Site-Specific Exemption may apply.

6.6.18 Site Security

Policy 120 New security fencing and gates on the Union Street boundary of the Graythwaite site should be designed to enhance Graythwaite's distinctive late nineteenth/early twentieth century presentation. The design should be based on historic evidence—ie the c1870s fence and gates visible in historic photographs.

Shore intends to extend the school campus across the Graythwaite site. The safety of students and staff is a primary concern of the School and therefore an upgrade of the security measures along the Union Street boundary and at the Edward Street entry will be required.

Graythwaite is a place of State heritage significance with a unique history as a grand private residence and subsequent use as a convalescent home and hospital. Principal views of the place from the public domain, primarily Union Street, should therefore reinforce and enhance Graythwaite's distinctive late nineteenth/early twentieth century presentation. Conventional security fencing is anticipated for all boundaries with properties owned by others and on Edward Street.

6.6.19 Building Security

- Policy 121 Prior to any works at Graythwaite House the architect is to schedule all historic hardware to be retained and removal of redundant equipment. It is noted that new security measures will require the introduction of discrete new door and window hardware and of movement detectors, security pads etc. These will need to be carefully integrated to minimise impact on the character of the building.
- Policy 122 Installation of new building security measures for significant buildings and structures is acceptable provided that:
 - significant door locks and window latches (generally relating to the nineteenth and early to mid twentieth century phases) continue to be used where possible;
 - significant door locks and window latches are retained in situ;
 - non-significant security measures (generally relating to the post-1980 phase) are carefully removed to avoid damage to significant building fabric;
 - remnants of any existing building security measures are recorded prior to any works consistent with the policies contained in Section 6.2.5 of this CMP; and
 - significant building fabric, such as timber doors, skirting boards and architraves adversely impacted by removal of obsolete security measures and/or installation of new security measures are repaired or reconstructed to their original detail.
- Policy 123 New building security measures should be kept to the minimum required and be installed in a manner that avoids or minimises adverse impacts on the external appearance of significant buildings and on significant fabric. Where possible, new measures should:
 - allow for retention of original locks and window latches in their existing locations;
 - be located in the least visible locations unless there is no viable alternative; and
 - not require removal of significant elements or fabric.

Improving the existing security of significant buildings and structures at Graythwaite will require new measures to be installed including deadlocks, window locks and dead bolts. It may also include security alarms and surveillance cameras. Such measures have the potential to adversely impact the heritage significance of the place through alteration of the appearance of significant buildings and/or through alteration of significant spaces, elements or fabric. These works should therefore be carefully designed to avoid, minimise or mitigate any adverse heritage impacts.

Installation of new security measures should also be undertaken consistent with the policies contained in Section 6.6.11 of this CMP.