

10 November 2015

Mr Michael Rowe, Associate  
JBA  
PO Box 375  
NORTH SYDNEY NSW 2059

Our Ref: 13-0055A mrl1

**Re: One Carrington Street Project Section 96 Application—Heritage Impact Assessment**

Dear Mr Rowe

We refer to the Section 96 application to modify the current Development Application (DA) for the proposed One Carrington Street development, which was lodged in April 2014. The scope of the modifications includes additional works to both Shell House at 2-12 Carrington Street and Beneficial House at 285 George Street, Sydney. Both buildings are listed as heritage items on Schedule 5 of Sydney Local Environmental Plan 2012 (Sydney LEP 2012).

This letter provides an assessment of the potential impacts of the proposed modifications on the heritage significance of the two heritage listed buildings, any other heritage items in the vicinity, and considers whether the revised works could adversely affect the historical and Aboriginal archaeological potential of the development site. The letter also makes recommendations where appropriate for mitigation measures to address any additional heritage impacts arising out of the proposed works comprising the Section 96 application.

The content of this letter is limited to consideration of the of the potential heritage impacts of the proposed modifications to the April 2014 DA. The assessments and recommendations in regard to these modifications should be read in conjunction with the heritage reports prepared for the current approved DA. These reports are:

1. One Carrington Street—Heritage Impact Statement (HIS) (GML Heritage, May 2014); and,
2. One Carrington Street—Archaeological Assessment and Impact Statement (AAIS) (GML Heritage, March 2014).

### **Background**

In March 2014 GML Heritage Pty Ltd (GML) was commissioned by Sovereign Wynyard Centre Pty Limited and its nominee 'Brookfield' to prepare a Heritage Impact Statement (HIS) for the proposed development known as One Carrington Street, Sydney. The development includes the demolition of the Menzies Hotel, 14 Carrington Street, and 301 George Street (formerly

#### **Sydney Office**

78 George Street Redfern  
NSW Australia 2016  
T +61 2 9319 4811  
F +61 2 9319 4383  
E [heritage@gml.com.au](mailto:heritage@gml.com.au)

#### **Canberra Office**

2A Mugga Way Red Hill  
ACT Australia 2603  
T +61 2 6273 7540  
F +61 2 6273 8114  
E [heritage@gml.com.au](mailto:heritage@gml.com.au)

**GML Heritage Pty Ltd**  
**ABN 60 001 179 362**

referred to as Thakral House); construction of a new 27-office storey commercial tower; and works to two heritage buildings—the former Shell House, 2–12 Carrington Street, and Beneficial House, 285 George Street.

The project had received Concept Plan approval (No. MP09\_0076) in April 2012, but excluded 285 George Street. The applicant was Thakral Holdings Group. The Director General's Requirements (DGR Issue 10) included a number of requirements to be addressed in the Heritage Impact Statement (HIS) for the development ie:

- *Address the impacts of the proposal on the heritage significance of the site and adjacent area including any surrounding heritage buildings and landscape heritage items including places, items or relics of significance to Aboriginal people (including but not limited to Shell House, Wynyard Park and Wynyard Station);*
- *Address the impact on the heritage significance of Shell House following the removal of internal elements;*
- *Provide an Archaeological Assessment of the site and the potential impacts of the proposed works;*
- *Address opportunities for heritage interpretation; and*
- *Consider the visual impact of the new access points on Carrington Street upon Wynyard Park.*

The Concept Plan approval was subsequently modified by the addition of 285 George Street. A HIS (One Carrington Street–Heritage Impact Statement, GML Heritage, May 2014) was prepared to satisfy the DGRs. An archaeological assessment (One Carrington Street–Archaeological Assessment and Impact Statement, GML Heritage, March 2014), including Aboriginal and non-Aboriginal archaeology, was also prepared as a separate report. Conservation Management Plans (CMPs) for Shell House (HBO + EMTB, September 2005) and 285–287 George Street (Graham Brooks and Associates, April 2004) had been prepared previously, and provided the conservation policy basis for assessing the heritage impacts of the redevelopment.

### **Scope of Section 96 Modifications**

The Design Report (make + architectus, October 2015) includes a table (Appendix A) which summarises the extent of the modifications. However, the actual scope of works to both Shell House and 285 George Street proposed under the modified DA is extensive, and comprises the following:

#### **Shell House**

- Replacement of 1970s aluminium framed windows on all facades with new single pane windows at Levels 01 to 10;
- Alteration of existing ground floor window on splay at the corner of Carrington Street and Margaret Street to create new entry doorway;
- Retention and repair/replacement of:
  - original arched steel frame windows at Carrington Street level on all facades;
  - original steel frame windows to central bays of Carrington Street and Margaret Street facades at Levels 01 to 10;
- Replacement of 1970s aluminium framed windows on all facades at Level 01 with new original pattern steel frame windows;
- Excavation of additional basement levels (to RL -0.75) below the existing Shell House basement;

- Light well/void to Level 01 not to be reinstated;
- Demolition of internal reinforced concrete structure and other elements at all levels, except for one structural bay behind the Carrington Street, Margaret Street and Wynyard Lane facades;
- Alterations to configuration and materials of new pavilions at roof level adjacent to clock tower, including reduction in depth of eastern roof terrace;
- Removal of original internal stair to clock tower, and salvage steel handrail for possible recycling.

### **285 George Street (Beneficial House)**

- Addition of new at roof level plant room with louvre screen to Wynyard Lane;
- Removal of remnant original ceilings and timber cladding to ground floor and mezzanine areas;
- Removal of original timber cupboards and panelling at ground floor, and salvage for possible recycling;
- Removal of existing (original and later) ceilings and replacement with fire rated ceilings to similar configuration at Levels 1 to 6;
- Insertion of new fire stair and A/C risers in existing kitchen area in northwest corner at all levels;
- Relocation and retention of early (probably non-original) water tower at roof level.

### **Heritage Impact Assessment**

The following section addresses the potential heritage impacts arising from the scope of works proposed under the modified DA proposal:

#### **Shell House**

The most significant change to the scope of works proposed under the Section 96 modification of the current DA is the demolition of the internal reinforced concrete structure and other elements at all levels (as allowed under the original Concept Plan approval), except for one structural bay behind the Carrington Street, Margaret Street and Wynyard Lane facades. The interiors of Shell House are highly modified, with little original fabric remaining, and consequently they do not contribute greatly to its heritage significance. The structure was assessed as being of Moderate significance in the 2010 Conservation Management Plan.

Notwithstanding the Moderate significance of the internal fabric, removing a substantial part of the original structure of Shell House would have some adverse impact on the building's heritage significance. However, given that the new internal structure will align with the levels of the retained sections of the existing floors, and the floor to floor levels and relationship to window openings will be retained, this impact would be acceptable.

The partial demolition of the internal reinforced concrete structure of Shell House will some risks for the retained façade, clock tower and other elements of the building. However, unlike the current DA, the actual columns supporting the clock tower will be retained, so the risk for that element at least will be reduced. Nevertheless, to mitigate the residual risks it is critical that the condition of the facade be fully understood and the methodology for its retention and protection during construction be worked out in detail to ensure that it will not suffer damage during the demolition and construction works. It is likely

that the original glazed terracotta facade cladding will require particular attention compared to other more robust materials.

The replacement of the 1970s aluminium framed windows on all facades with new single pane windows at Levels 01 to 10 means that the original glazing pattern for these windows, which were the predominant opening pattern for the upper floors of the original building, will not be reinstated. However, the symmetrical and ordered arrangement of the replacement windows around the retained original steel frame windows to the central bays of the Carrington Street and Margaret Street facades at Levels 01 to 10, combined with the retention/reinstatement of the more significant original arched and rectangular steel frame windows at the lower levels is an acceptable outcome.

Similarly, the alteration of the existing ground floor window on splay at the corner of Carrington Street and Margaret Street to create new entry doorway, is an acceptable solution to providing additional access to the building, given that the remainder of these lower level windows will be retained and restored.

### **285 George Street (Beneficial House)**

The scope of works proposed under the Section 96 modification of the current DA will result in some adverse impacts, but these impacts are minor.

The insertion of new fire stair and A/C risers in the existing kitchen area in the northwest corner of 285 George Street at all levels will mean that a stair landing will cross the end bay window and active uses behind the second bay of windows will be precluded by the A/C risers. It will not be possible to mitigate these impacts, however because of the narrow width of Wynyard Lane, these impacts will not be visually prominent from within the public realm.

Internally, the proposed works includes the removal of some original and/or significant fabric, although this fabric is generally not substantially intact in any case. The removal of existing (original and later) ceilings at Levels 1 to 6, and their replacement with fire rated ceilings, is necessary to provide BCA compliance. However, these original ceilings are flush rather than decorative, and have already been altered on some levels. The proposed new ceilings will for much of the interior spaces be similar in configuration to the existing (ie fixed to the underside of the floor structure, and enclosing the original steel beams), so the appearance of the new ceilings will largely replicate the originals.

The removal of remnant original ceilings, timber cladding to columns and cupboards to the ground floor and mezzanine areas is also a BCA compliance imperative, but the ceilings and cladding comprise remnant fabric that has been substantially modified over time. The removal of this fabric will result in a minor adverse heritage impact only. The removal of original timber cupboards and panelling at the ground floor will result in a minor adverse heritage impact, but this impact may be able to be mitigated by careful and salvage for possible recycling.

### **Heritage Items in the Vicinity**

The scope of works to Shell House and 285 George Street proposed under the modified DA is extensive in detail, but the impacts will be restricted to the fabric of the two heritage listed buildings. There will be no additional impacts on any other heritage items in the vicinity, including Wynyard Station, Wynyard Park and Lisgar House.

### **Historical Archaeology**

The 2014 AAIS identified that the sites of the former Shell House and Beneficial House have the potential to contain deep subsurface historical archaeological features from the second phase of the site occupation (1850–1920s). These features would comprise rock cut wells and/or cisterns with their content (discarded artefacts). The features have been assessed to be significant at a Local level. The construction of the additional basement levels would require that these features, should they still survive at the site, be fully removed.

### **Aboriginal Heritage**

The 2014 AAIS identified that the site has low potential to contain evidence of Aboriginal occupation of the site, in the form of stone objects. If Aboriginal stone objects are still present within the site, they are likely to be contained within the pockets of residual soils and/or disturbed soils in the north section of Wynyard Lane or as part of the content of the deeper subsurface historical archaeological features such as rock cut wells and/or cisterns. On this basis, it is reasonable to suggest that the proposed development works still present some risk to potential Aboriginal objects that may survive within the development site.

### **Conclusions and Recommendations**

Overall, although in some detail respects the modifications to the scope of works proposed under the Section 96 application to modify the current DA will have some additional heritage impacts, these are generally offset by other proposed changes to the scope of works that will result in more positive heritage outcomes.

In summary, the proposed scope of works are acceptable in heritage terms, but it will be necessary to apply a range of mitigation measures to manage those adverse impacts that will result from the modifications, and to implement the opportunities for enhanced heritage outcomes, particularly in regard to interpretation and the conservation of significant/original fabric. These measures are derived from those included in the 2014 HIS, amended as required to address the proposed modified scope of works (refer to Attachment A).

The potential historical and Aboriginal archaeological impacts arising from the scope of works proposed under the modified DA proposal are substantially as for the current DA. These can be mitigated by archaeological monitoring during demolition works, which is in line with the recommendations proposed in the 2014 AAIS (refer to Attachment B).

Please do not hesitate to contact me if you have any queries about the above.

**Yours sincerely**  
**GML Heritage Pty Ltd**



**Peter Romey**  
**Partner**

## ATTACHMENT A

### Recommendations

#### Generally

- Detailed design of the One Carrington Street development should ensure that relevant heritage conditions of the Concept Plan Approval Schedule 3, as well as any heritage requirements of subsequent approvals are met.
- A photographic archival recording should be prepared of the former Shell House, Beneficial House and the Wynyard Station pedestrian tunnels (including the Hunter Connection) prior to works commencing. The archival recording should be prepared in accordance with the NSW Heritage Council guidelines *Photographic Recording Of Heritage Items Using Film or Digital Capture*, 2006. The archival recording should be updated following demolition of the Menzies Hotel and 301 George Street, as well as the interiors of the former Shell House and Beneficial House, to record any original fabric or details revealed during the works.
- Interpretation of the history of the subject site should be incorporated into the proposed development. The interpretation should include the history of the site as part of the military parade ground and subsequent subdivision, the development of Shell House as the Shell Oil Company's Australian headquarters, the planning and construction of Wynyard Station and arcades, and the development of Beneficial House as Peapes Menswear store. Recommendations for interpretation are provided below.
- Specialist heritage advice should be incorporated into the detailed design and construction phases to guide works to the former Shell House (in accordance with Policy 5 of the 2005 CMP) and Beneficial House.
- Construction works should avoid physical impacts on heritage items in the vicinity, including Lisgar House and Wynyard Park. Lisgar House should be protected during construction works and its condition monitored.

#### Former Shell House

- The conservation policies in the 2005 CMP should be used to guide the detailed design of works to the former Shell House.
- Prior to the commencement of works, the condition of the glazed terra cotta facade should be fully documented and a detailed methodology for its monitoring and protection during construction be developed to ensure that it will not suffer damage during the demolition and construction works.
- Detailed design for the reinstated Carrington Street entrance should be undertaken during the design development stage. Advice from a heritage specialist with expertise in working with glazed terracotta should be sought in designing or selecting the new entry door and framing.
- The conservation and repair of the original steel framed windows in the former Shell House proposed for retention, and the fabrication of identical windows to replace missing ones, should be supervised by experienced conservation specialists. Advice from a heritage specialist with expertise in working with glazed terracotta should be sought in detailing the insertion of the new windows.
- A detailed condition assessment and schedule of conservation works should be prepared for the glazed terracotta facade of the former Shell House, including the clock tower, in accordance with

Policy 14 of the 2005 CMP. The assessment and schedule should be prepared by a suitably qualified materials expert with extensive experience in the repair and conservation of this material. Conservation works to the glazed terracotta facade should also be guided by this expertise.

- Expert advice sought for the clock in the former Shell House should be retained to guide the conservation and repair works to the clock. The clock should be put back in working order and adaptation to a digital master clock would be appropriate. The original mechanism should be retained, conserved and interpreted.
- The photographic archival recording of the former Shell House should include the turntable in the basement and the early truck lift in the Menzies Hotel building.

### **Beneficial House**

- The conservation policies in the 2004 CMP should be used to guide the detailed design of works to Beneficial House.
- Significant original fabric should be retained and conserved, including the original George Street and Wynyard Lane facades, window and French door joinery and the tiled roof parapet.
- A detailed condition assessment and schedule of conservation works should be prepared for the Beneficial House facades to guide works to the significant windows, sills, mouldings, tiled roof parapet, and brick walls, including the southern wall that would be exposed during the works. The assessment and schedule should be prepared by a suitably qualified heritage specialist.
- The condition assessment and schedule of conservation works should be updated during demolition works to include the southern wall, which would be exposed following demolition of 301 George Street.
- Significant original fabric to be removed, such as ceilings to Levels 1 to 6, remnant original ceilings, timber cladding to columns and cupboards to the ground floor and mezzanine areas, should be archivally recorded prior to removal.
- Intervention into original fabric for required structural works or insertion of new services should be minimised.

### **Wynyard Lane**

- Wynyard Lane should be reinstated following excavation for and construction of the One Carrington Street tower, in accordance with the Project Application design.

### **Wynyard Station Pedestrian Arcades**

- Photographic archival recording before and during construction works would be sufficient to mitigate the impact of the proposal on the Wynyard Station pedestrian arcades.

### **Interpretation Recommendations**

- An Interpretation Plan for the whole One Carrington Street development, including the former Shell House, Beneficial House and Wynyard Lane, should be developed to guide interpretation at the site.
- The Interpretation Plan should be developed in accordance with current best-practice guidelines and approaches, including the NSW Heritage Office *Interpreting Heritage Places and Items Guidelines* 2005.

- The Interpretation Plan should include an analysis of the current and potential future audiences for interpretation.
- The Interpretation Plan should outline the key themes and messages for interpretation. In preparing to interpret places, it is important to present their past in an informative, interesting and easily accessible way. This is achieved through communicating the history and significance of the site via key historical themes and stories. The Heritage Division (formerly the NSW Heritage Office), Office of Environment and Heritage, has developed State historical themes, several of which are applicable to the One Carrington Street site and should be developed as part of the Interpretation Plan. Set out below are potential NSW State historical themes and stories for interpretation of the One Carrington Street site. A short commentary relating the site to each of the historical themes is also included. The Interpretation Plan should refine these themes:
  - Aboriginal cultures and interactions with other cultures: Accounts of Governor Arthur Phillip and Philip Gidley King identified that the Gadigal (also spelt Cadigal) people were the inhabitants of the area between South Head and Darling Harbour. The original Aboriginal inhabitants of the study area would have been among the first Indigenous people to experience the effects of physical and social dislocation as a result of the arrival of the First Fleet at Sydney Cove.
  - Convict/Law and Order: The One Carrington Street site formed part of the parade ground and eastern boundary of the George Street military barracks, which was established soon after the arrival of the First Fleet in 1788. The barracks and parade ground claimed for the military the prime position along the ridge overlooking the settlement.
  - Town, suburbs and villages: The lots that make up the One Carrington Street site are the result of two important planning decisions in the history of Sydney: the subdivision of the parade ground in 1848, which triggered the transformation of this area of Sydney from the domain of the military to a thriving commercial area, and the construction of the City Circle Railway, including Wynyard Station, which triggered further, larger development and made the immediate area a major transport hub in the CBD.
  - Commerce: The One Carrington Street site has been a site of commerce since the parade ground was subdivided in 1848. It has been the home of hotels, warehouses, offices, restaurants, tailors, hatters, shirtmakers and department stores (in the form of Beneficial House, formerly Peape's Menswear Store. The former Shell House was purpose-designed as the Australian headquarters of the international Shell Oil Company.
  - Transport: The construction of the City Circle Railway, including Wynyard Station, had a huge impact on the study area, resulting lot amalgamations and new development. It also triggered further, larger development in the area and transformed it into a major transport hub in the CBD. The One Carrington Street site includes pedestrian arcades which were part of the original design of Wynyard Station—this historic access will be reinstated in the proposed new development.
  - Creative endeavour: The former Shell House and Beneficial House are the result of considerable creative endeavour and have significant aesthetic qualities. Aspects of Shell House's design, such as the use of glazed terracotta and the building's Commercial Palazzo form, can tell the story of the design of major commercial buildings in the 1930s, while Beneficial House demonstrates the Georgian Revival design approach favoured by prominent Sydney architectural firm Wilson, Neave & Berry.

- Leisure: Café Francais and the Menzies Hotel contributed greatly to the leisure of city workers and Sydney residents during the twentieth century. Café Francais was said to be frequented by all the 'Bucks and Brummels of the Colony' and occupied the site for almost 90 years. The Menzies Hotel was a premier venue of its time, containing the 500-seat Emperor Room where guests, seated on tiered floors, overlooked the dance floor where cabaret artists and musicians performed each evening amidst the restaurant's Roman purple and gold décor, and a permanent, retractable ice rink.
- Interpretation initiatives should be open to the public, engaging and informative. They should use documentary research and graphic materials to convey and interpret the historical evolution and significance of the site, and should be accessible and compatible with the history and significance of the One Carrington Street site.
- Opportunities to involve people with significant attachments to the place should be investigated as part of the Interpretation Plan, and could include Aboriginal people, current and past Menzies Hotel workers, former Shell Oil Company employees who worked in Shell House, and former Peape's Menswear store employees who worked in Beneficial House.
- The Interpretation Plan should define the interpretation initiatives, including locations and methods. Interpretation initiatives should be well-integrated into the One Carrington Street design. Potential locations and methods in the development that could be considered include:
  - large-scale signs, wall etchings or inlays along Wynyard Lane, which employ historical imagery and text to demonstrate the historical development of the One Carrington Street site;
  - inlays or panels in the George Street entrance to the development and in the Carrington Street foyer, using historical imagery and text to tell the story of the One Carrington Street site;
  - digital projections of historical images, animations or text on walls and floors in the public entranceways and foyers, or on the rooftop terraces or along Wynyard Lane, or onto the former Shell House clock tower;
  - compilation of an interpretive video which could document the construction process and include interviews with the development's designers and builders;
  - use of archaeological features that may be uncovered during the works in interpretive displays;
  - the use of digital media to provide opportunities for visitors and users of the site to engage with it through contributing stories and images which in turn keep places alive and vital. Platforms or applications such as Instagram and Flickr could be used;
  - conservation and interpretation of the original clock mechanism within the clock tower;
  - using names from the site's history in the naming of different elements of the building, such as meeting rooms, cafes and the potential bar/restaurant at the former Shell House. Examples could include Peapes Café, the Shell House Bar and Café Francais; and
  - use of current and historical images and text on the site hoardings during construction.

## ATTACHMENT B

### Recommendations

#### Aboriginal Heritage

- Based on the findings of the due diligence assessment and in accordance with the guidelines of OEH and the NPW Act, it is recommended that the management of potential Aboriginal cultural resource be undertaken as part of joint archaeological process that involves both Aboriginal and historical archaeological potential of the subject site.
- An opportunity to physically investigate if any evidence of Aboriginal occupation of the site still survives could be realised during archaeological monitoring and recording required for the historical archaeological component of the project.
- In accordance with current standard protocol for Part 3A projects, it is recommended that best practice guidelines be followed to ensure that harm to potential Aboriginal sites/objects is avoided.
- Where it is not possible to avoid harm to a potential Aboriginal site/object the following process outlined in Section 8.0 of the AAIS should be undertaken. The process includes the:
  - A joint methodology should be prepared to guide the investigation works required for both historical and Aboriginal archaeological potential at the site. The appropriate investigation methodology and research framework for mitigation of the proposed development impacts would be outlined in a Work Method Statement or Archaeological Research Design document.
  - All Aboriginal archaeological excavation works and associated reporting should be undertaken following the OEH *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (2010). The Code defines the methodology for undertaking archaeological works, negating the need to prepare a stand-alone methodology for this work.
  - The local Aboriginal community should be engaged during all Aboriginal heritage works. The current OEH list of Aboriginal stakeholder for Sydney details four separate groups. These groups should be provided with this report, the methodology for investigation of the archaeological deposits and offered the opportunity to participate in the field investigations. It should be noted that Aboriginal communities generally require payment for their time and involvement in projects.
  - Archaeological monitoring and subsequent investigation works of natural soil horizons (should they be identified during the proposed works) would be undertaken in accordance with the approved Work Method Statement/Archaeological Research Design. In the event that Aboriginal cultural material is identified within the subject area, the site would need to be registered with AHIMS in accordance with Section 89A of the NPW Act 1974.
  - In the unlikely event that Aboriginal skeletal remains were identified within the subject area, all works should cease and the NSW Police, OEH, Aboriginal community and archaeological contractors be involved in the positive identification and determination of management requirements.

- In the event that the proposed physical investigation of the site results in the discovery of Aboriginal cultural material, the investigation would continue until such material is completely excavated.
  - Following completion of the proposed physical investigation a report on the results would be prepared. The extent and nature of the report would depend on the results obtained through the investigations.
  - If the proposed investigation works do not result in the discovery of any Aboriginal cultural material, a brief letter-form report should be prepared detailing the nature of works. This would for evidence of compliance with the project's Part 3A Statement of Commitments.
  - If the proposed investigation works do result in the discovery of any Aboriginal cultural material, an excavation report should be prepared following the *Guide to Investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2011). The report should detail the methods, procedure, results (including artefact analysis), significance assessment and management recommendations arising from the excavation. Artefact recording and analysis of all Aboriginal stone artefacts through the excavation should be undertaken in accordance with the approved Work Method Statement/Archaeological Research Design and the permanent storage solution/repository for the recovered stone artefacts should be nominated and documented in the post-excavation report.
  - If Aboriginal cultural material is recovered from the subject area, the proponent will need to discuss the future management of the material and potentially design a permanent on-site storage for its long term curation, in collaboration with the wishes of the local Aboriginal community.
- A copy of this report and any other relevant documentation subsequently prepared for this project should be sent to the OEH and Registered Aboriginal Parties for their records.

### **Historical Archaeology**

- Given that the proposed development works in the areas of the former Shell House and the north section of Wynyard Lane (ie the section that was not subject to deep excavation to accommodate three underground levels for pedestrian access to Wynyard Station and the basement space of the Plaza Hotel in the late 1920s) have the potential to impact on any surviving historical archaeological remains, archaeological monitoring and recording should be undertaken in conjunction with the ground disturbance works required for the proposed redevelopment.
- Based on the current status of the project as a Major Development approved under Part 3A of the EPA Act, the relic provision of the Heritage Act does not apply. Therefore, it is recommended that archaeological monitoring and recording be undertaken in accordance with archaeological best practice. This would involve detailed investigation of any exposed archaeological relics by applying the established archaeological methodology (cleaning, recording note taking, photographing, planning, level taking) that would be outlined in a joint Work Method Statement/Archaeological Research Design specifically prepared for the subject site.

- The results of archaeological monitoring and recording of the site should be presented in a succinct excavation report and used to inform future interpretation measures, if appropriate, as part of the proposed development of the site.
- Any retrieved historical artefactual material would be the responsibility of the owner of the site. This includes appropriate treatment of the artefacts, and their long-term storage in a safe and accessible place.
- In the event that significant historical archaeological evidence not identified in this report was to be encountered during site works, works should cease and the NSW Heritage Division, OEH notified immediately in accordance with Section 146 of the Heritage Act. Further assessment and/or approval may be required before works could recommence.
- A copy of this report and any other relevant reports subsequently prepared as part of this project should be sent to the NSW Heritage Division for their records.

#### **General Recommendations**

- Following the completion of archaeological monitoring and recording at the site, it is recommended that highly intact archaeological remains of State significance within the site be protected and left in situ, where possible.
- However, should the project require their removal, opportunities to interpret significant evidence discovered during the proposed works should be considered as part of a holistic approach to interpreting the site, and for the benefit of the local community and tourism.