

COUNCIL RESOLUTION EXTRACT FROM MINUTES 14 JULY 2014

PUBLIC ACCESS FORUM – WATERFALL GENERAL CEMETERY

Mrs C Herben OAM, advised that the 2,073 people recorded as being buried in the Waterfall General Cemetery died in isolation, away from their families. Research is bringing to light their stories, who they were, their families and where they came from. Each and every one of these people has a story that needs to be known. Mrs Herben also advised that this year, being the centenary of the commencement of World War I, research was submitted to the Department of War Graves for verification that there was more than one serviceman buried in the cemetery. In March the Department acknowledged 10 of the 14 names submitted were WWI servicemen.

In conclusion, Mrs Herben asked that Council consider setting up a committee made up of staff from Council's property and cemetery management sections, along with people with expertise in heritage and historical cemeteries. This committee would bring forward the future plan for cemeteries in New South Wales.

- 117** **COUNCIL'S RESOLUTION** - RESOLVED UNANIMOUSLY on the motion of Councillor Brown seconded Councillor Colacino that the speakers be thanked for their presentation and invited to table their notes.

COUNCIL RESOLUTION EXTRACT FROM MINUTES 14 JULY 2014

ITEM 1 - WATERFALL GENERAL (GARRAWARRA) CEMETERY FUTURE MANAGEMENT OPTIONS

A PROCEDURAL MOTION was MOVED by Councillor Crasnich seconded Councillor Blicavs that Councillor Colacino be granted additional time to address the meeting in relation to Item 1. An additional five minutes was granted.

121 COUNCIL'S RESOLUTION - MOVED Councillor Colacino seconded Councillor Connor that -

- 1 The *Waterfall General (Garrawarra) Cemetery: Conservation Management Plan* (Attachment 1 of the report) be endorsed, and the recommended management approach be adopted and implemented as follows:
 - a The Cemetery continue to be managed by Council;
 - b The Cemetery be managed as an historic bush cemetery;
 - c Once the site can be made safe, public access be made available through regular public open days;
 - d Legal access to the site be negotiated with the Crown Lands Division of the Department of Trade and Investment, through establishment of a suitable easement or right of way; and
 - e The E3 Environmental Management zone for the site, within the Wollongong Local Environmental Plan 2009, be retained.
- 2 Council pursue State Government and grant funding opportunities to develop and implement an initial program of works, to achieve the following objectives:
 - a Clearance of the central driveway to allow vehicular access for maintenance;
 - b Removal of deadwood throughout the site to reduce trip hazards and fire loads; and
 - c Removal of selected trees and vegetation that pose a risk to public safety and/or the conservation of graves, particularly in the

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areas of the site identified within the Conservation Management Plan.

- 3 Should external funding opportunities not be successful, Council consider a budget allocation for this work through the 2015/2016 or 2016/2017 Annual Plan and Budget process.
- 4 Council consider the allocation of funding for ongoing maintenance through the 2015/2016 or 2016/2017 Annual Plan and Budget process.
- 5 A draft Planning Proposal be prepared to amend the Wollongong Local Environmental Plan 2009, as follows:
 - a Amend the listing of Item 61028 in Schedule 5 – Environmental Heritage, Part 1 to:
 - i Change the item name from “Garrawarra Hospital Cemetery”, to “Waterfall General (Garrawarra) Cemetery”; and
 - ii Add Lot 3 DP 840501 and Lot 622 DP 752033 to the property description;
 - b Amend the Heritage Map to expand the curtilage of Item 61028 to reflect the Curtilage Map within the Conservation Management Plan; and
 - c Amend the Heritage Map to expand the curtilage of the “Garrawarra Hospital Heritage Conservation Area” to include the “Waterfall General (Garrawarra) Cemetery”.
- 6 A formal nomination be submitted to the NSW Heritage Council for listing of the Waterfall General (Garrawarra) Cemetery, as part of the former Waterfall Sanatorium, on the State Heritage Register.
- 7 Additional consultation be undertaken with registered stakeholders to further consider the potential establishment of a ‘Friends of Waterfall General (Garrawarra) Cemetery Group’.
- 8 Available funding opportunities and grant programs be pursued to assist with the cost of implementing the initial works program.
- 9 Letters be sent to the NSW Premier, the Minister for The Illawarra, the Minister for Heritage and the Member for Heathcote, outlining the unique issues presented by the Cemetery and its handover to Council in 1967, highlighting the State Heritage significance of the site, and seeking State Government funding support for the initial works program.
- 10 Letters of thanks be sent to all those who provided information and

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participated in the consultation and exhibition process.

Variation The variation moved by Councillor Takacs to add the words 'or 2016/2017' to Parts 3 and 4 of the recommendation, was accepted by the mover and seconder.

An AMENDMENT was MOVED by Councillor Curran seconded Councillor Martin that -

- 1 The *Waterfall General (Garrawarra) Cemetery: Conservation Management Plan* (Attachment 1 of the report) be endorsed, and the recommended management approach be adopted and implemented as follows:
 - a The Cemetery continue to be managed by Council;
 - b The Cemetery be managed as an historic bush cemetery;
 - c Once the site can be made safe, public access be made available through regular public open days;
 - d Legal access to the site be negotiated with the Crown Lands Division of the Department of Trade and Investment, through establishment of a suitable easement or right of way; and
 - e The E3 Environmental Management zone for the site, within the Wollongong Local Environmental Plan 2009, be retained.
- 2 Council pursue State Government and grant funding opportunities to develop and implement an initial program of works, to achieve the following objectives:
 - a Clearance of the central driveway to allow vehicular access for maintenance;
 - b Removal of deadwood throughout the site to reduce trip hazards and fire loads; and
 - c Removal of selected trees and vegetation that pose a risk to public safety and/or the conservation of graves, particularly in the areas of the site identified within the Conservation Management Plan.
- 3 Should external funding opportunities not be successful, Council consider a budget allocation for this work through the 2015/2016 Annual Plan and Budget process.
- 4 Council consider the allocation of funding for ongoing maintenance through the 2015/2016 Annual Plan and Budget process.
- 5 A draft Planning Proposal be prepared to amend the Wollongong Local

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Environmental Plan 2009, as follows:

- a Amend the listing of Item 61028 in Schedule 5 – Environmental Heritage, Part 1 to:
 - i Change the item name from “Garrawarra Hospital Cemetery”, to “Waterfall General (Garrawarra) Cemetery”; and
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- 6 A formal nomination be submitted to the NSW Heritage Council for listing of the Waterfall General (Garrawarra) Cemetery, as part of the former Waterfall Sanatorium, on the State Heritage Register.
- 7 a Additional consultation be undertaken with registered stakeholders to further consider the potential establishment of a ‘Friends of Waterfall General (Garrawarra) Cemetery Group’.
- b Council establish a Waterfall General Cemetery Planning and Management Committee to advise on operational and strategic planning matters associated with the management of this site.
- 8 Available funding opportunities and grant programs be pursued to assist with the cost of implementing the initial works program.
- 9 Letters be sent to the NSW Premier, the Minister for The Illawarra, the Minister for Heritage and the Member for Heathcote, outlining the unique issues presented by the Cemetery and its handover to Council in 1967, highlighting the State Heritage significance of the site, and seeking State Government funding support for the initial works program.
- 10 Letters of thanks be sent to all those who provided information and participated in the consultation and exhibition process.

Variation The variation moved by Councillor Blicavs to move Part 1(b) to be Part 7(b) was accepted by the mover and seconder.

Councillor Curran’s AMENDMENT on being PUT to the VOTE was LOST.

In favour Councillors Martin, Blicavs and Curran

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Against

Councillors Kershaw, Connor, Brown, Takacs, Merrin, Dorahy, Colacino, Crasnich, Petty and Bradbery

Councillor Colacino's MOTION on being PUT to the VOTE was CARRIED UNANIMOUSLY.

ITEM 1

WATERFALL GENERAL (GARRAWARRA) CEMETERY FUTURE
MANAGEMENT OPTIONS

On 27 August 2012 Council considered a report on the Waterfall General (Garrawarra) Cemetery. Council resolved to develop a Conservation Management Plan for the site, and to further explore issues such as ownership, access and risk. Council also resolved that a further report be prepared, following these additional investigations, detailing the options for future ownership, management, interpretation and public accessibility.

This report details the outcomes of this additional work and research, as well as the outcomes of a community engagement process undertaken during September – November 2013. The report outlines options and recommendations for the future management of the site and proposes the conservation of the site within its bushland setting. The report proposes that Council retain management responsibilities for the site and that State heritage listing be sought.

RECOMMENDATION

- 1 The Waterfall General (Garrawarra) Cemetery: Conservation Management Plan (Attachment 1) be endorsed, and the recommended management approach be adopted and implemented as follows:
 - a The Cemetery continue to be managed by Council;
 - b The Cemetery be managed as an historic bush cemetery;
 - c Once the site can be made safe, public access be made available through regular public open days;
 - d Legal access to the site be negotiated with the Crown Lands Division of the Department of Trade and Investment, through establishment of a suitable easement or right of way; and
 - e The E3 Environmental Management zone for the site, within the Wollongong Local Environmental Plan 2009, be retained.
- 2 Council pursue State Government and grant funding opportunities to develop and implement an initial program of works, to achieve the following objectives:
 - a Clearance of the central driveway to allow vehicular access for maintenance;
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 - c Removal of selected trees, and vegetation that pose a risk to public safety and/or the conservation of graves, particularly in the areas of the site identified within the Conservation Management Plan.
- 3 Should external funding opportunities not be successful, Council consider a budget allocation for this work through the 2015/2016 Annual Plan and budget process.
- 4 Council consider the allocation of funding for ongoing maintenance through the

2015/2016 Annual Plan and budget process.

- 5 A draft Planning Proposal be prepared to amend the Wollongong Local Environmental Plan 2009, as follows:
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- 6 A formal nomination be submitted to the NSW Heritage Council for listing of the Waterfall General (Garrawarra) Cemetery, as part of the former Waterfall Sanatorium, on the State Heritage Register.
- 7 Additional consultation be undertaken with registered stakeholders to further consider the potential establishment of a ‘Friends of Waterfall General (Garrawarra) Cemetery Group’.
- 8 Available funding opportunities and grant programs be pursued to assist with the cost of implementing the initial works program.
- 9 Letters be sent to the NSW Premier, the Minister for The Illawarra, the Minister for Heritage and the Member for Heathcote, outlining the unique issues presented by the Cemetery and its handover to Council in 1967, highlighting the State Heritage significance of the site, and seeking State Government funding support for the initial works program.
- 10 Letters of thanks be sent to all those who provided information, and participated in the consultation and exhibition process.

ATTACHMENTS

- 1 Waterfall General (Garrawarra) Cemetery: Conservation Management Plan, BIOSIS, 7 June 2013
- 2 Discussion Paper: Issues and Options for the Future Management of Waterfall General (Garrawarra) Cemetery
- 3 Waterfall General (Garrawarra) Cemetery: Photographic Index of Identifiable Graves
- 4 Waterfall General (Garrawarra) Cemetery – Summary of Submissions

REPORT AUTHORISATIONS

Report of: Renee Campbell, Manager Environmental Strategy and Planning
Authorised by: Andrew Carfield, Director Planning and Environment – Future City and Neighbourhoods

BACKGROUND

Location and Site Context

The Waterfall General (Garrawarra) Cemetery site is situated on Lot 4 DP 840501, located to the north-west of Helensburgh. The site is situated between the Old Princes Highway (to the west) and the F6 Freeway (to the east), and approximately 1km south of the Garrawarra Centre. The site is located along an old alignment of the Old Illawarra Road, which now serves as a fire trail. The Cemetery is surrounded by Crown Land, in the management of various State Agencies, including; the Ministry of Health (to the north and east), the Sydney Catchment Authority (to the West) and the Department of Trade and Investment Crown Lands Division (to the south). The site and the surrounding land is consumed with regrowth bushland.

Historical Context

A detailed history of the site was provided in the Council report of 27 August 2012, and further history is provided within both the Conservation Management Plan (*Attachment 1*) and the Discussion Paper (*Attachment 2*). The following discussion therefore focusses on the history surrounding the transfer of the site to Council and the historical context that led to the current situation. These aspects of the history have not been detailed at length in previous reporting and are important in understanding Council's current situation and informing Council's decision making.

Between 1909 and 1949, the Waterfall General (Garrawarra) Cemetery received over 2,000 burials, almost all of whom died of Tuberculosis within the Waterfall Sanatorium. On 1 September 1967, 18 years after the last burial on the site, and following a significant period of minimal maintenance, the Cemetery was placed under the custodianship of Wollongong City Council.

The transfer of management responsibility occurred under the Local Government (Control of Cemeteries) Amendment Act 1966. This Act transferred responsibility for most General Cemeteries across the State to Local Government. For Wollongong Council, the handover came at the same time as the transfer of four other active general cemeteries, including: Helensburgh, Scarborough, Bulli and Wollongong.

It appears from the evidence that whilst Council's Cemetery staff in the late 1960's and early 1970's were aware of Council's management responsibility, the handover of the abandoned site appears to have been a legal transfer only. There is no evidence that Council ever took up an active role in maintaining the site. It appears that the burial records were never handed to Council by the Department of Health, as was required under the 1966 legislation.

There are a number of important historic factors that help explain why a site containing 2,000 burials was able to be effectively ‘forgotten’ for such a long period:

- 1 Council inherited four active cemeteries at the same time, and would have been trying to recruit suitable staff, develop organisational skills, procedures and policies, to ensure the ongoing running of these operational Cemeteries. As such, these sites would have understandably been treated with a higher priority.
- 2 Based on the evidence gathered through research, and the community engagement process, it appears likely that the site had already been unmaintained for a considerable period prior to the transfer of ownership.
- 3 Cultural attitudes toward cemeteries, and particularly abandoned cemeteries, at this time were substantially different. This is well demonstrated by the fact that only two decades earlier Wollongong’s earliest burial grounds, the original Roman Catholic Cemetery (Andrew Lysaght’s Park) and the original Church of England Cemetery (Pioneer Rest Park) were having their headstones laid flat to turn these ‘unsightly’ areas into rest parks. This occurred with strong community support.
- 4 The site was very remote and isolated, was not strongly tied to the local community, and was out of general public consciousness.
- 5 Many (though certainly not all) of those who were buried in the Cemetery had already been isolated from their families due to the stigma attached to the disease, and/or their remoteness from their local communities and family. Many of those buried within the site were recent migrants, who either: came to Australia for treatment; contracted the disease on the voyage; or had no/little local family or community connections.
- 6 It is also likely that the stigma and fear of the TB virus would still have been fresh in the community conscious, and the risk of infection from the Cemetery would not have been well understood.

Due to these issues, Council’s responsibility for the site was effectively forgotten up until 2011, when, during the consideration of the Helensburgh 7D Lands Review, the matter was brought to Council’s attention.

Previous Council Resolution

On 27 August 2012 Council considered a report on options for the future management of the Waterfall General (Garrawarra) Cemetery. Council resolved that:

- 1 *Stage 1 of the proposal detailed in the report be undertaken, including:*
 - a *Preparation of a Conservation Management Plan;*
 - b *Further explore access options/arrangements;*
 - c *Undertake a risk assessment;*
 - d *Undertake community consultation including with families of those buried in the cemetery;*
 - e *Explore possible sources of funding for the site;*

- f Consider the potential for a 'Friends of the Cemetery' or a 'Cemetery Conservation' group; and*
 - g Pursue and make publicly available a burial register for the site.*
- 2 Following completion of Stage 1, a further report be provided to Council detailing the outcomes of Stage 1 and the options available for future ownership, management, interpretation and public accessibility.*
- 3 Council write to the NSW Office of Environment and Heritage outlining support for consideration of the Garrawarra Hospital site, including the Cemetery, for listing on the State Heritage Register.*

Following this resolution, Council staff, with the support of the Wollongong Heritage Advisory Committee, commenced a project to address the various issues raised in Part 1 of Council's resolution. This Council report responds to Part 2 of the resolution and has been prepared to detail the outcomes of the Stage 1 process. It should also be noted that Council wrote to the Office of Environment and Heritage in relation to Part 3 of the resolution and was advised to prepare and lodge a formal State Heritage Nomination for the site.

Conservation Management Plan

Council engaged BIOSIS to prepare a Conservation Management Plan for the site. The Conservation Management Plan, (*Attachment 1*), provides a detailed discussion of the history of the site, and an assessment of the site's heritage significance. This assessment includes a comparative analysis with similar and relatable cemeteries.

The document found that the site, as part of the broader Waterfall Sanatorium, is of State Heritage Significance and recommended that the site be listed on the State Heritage Register. The Plan provides the following Statement of Significance, which outlines the core significance of the site:

The Waterfall General Cemetery actively serviced the Waterfall State Sanatorium for Tuberculosis between the years of 1909 and 1949. As part of its associations with the Waterfall State Sanatorium, the Cemetery provides unique documentation and physical evidence of the progress, or lack of progress, in treating tuberculosis in NSW in the early to mid-20th century. The Cemetery also demonstrates the burial processes and cooperation between a State institution and local religious organisations in an isolated context. Through servicing the largest and only State run institution for tuberculosis in NSW, the Cemetery is important in understanding these activities at a State level.

Through its management policies and recommendations, the Conservation Management Plan effectively details a proposed management response, focused on heritage conservation. This approach proposes the management of the Cemetery's heritage values within its bush-land setting and is consistent with the recommendations of this report.

Discussion Paper

In addition to the development of the Conservation Management Plan, Council officers also undertook a range of other work to further explore the other issues detailed in Council's resolution.

During late 2013, the progress and outcomes of this work were detailed into a *Discussion Paper: Issues and Options for the Future Management of Waterfall General (Garrawarra) Cemetery (Attachment 2)*. This document provided a detailed update and discussion of the outcomes of Council's investigations into the various aspects of Council's resolution (see Section 3 of *Attachment 2*).

The document discussed the key issues, and outlined a range of options to inform the community consultation around the major decision points for future management of the site. These key issues included: Custodianship; Management Strategy; Access Options; Planning/Land Use Zoning; and Heritage Listings. The options presented to the community for discussion are detailed in Section 4 of *Attachment 2*.

The discussion paper also introduced the idea of a 'Friends Group' being established to support future management of the site. Stakeholders were encouraged to express an initial interest in being involved in a possible 'Friends Group', in an attempt to gauge initial interest.

The Discussion Paper was designed to guide the discussion and inform stakeholders and the community during a public exhibition period. The formal exhibition was held from 20 September 2013 to 15 November 2013, though registrations of interest in the site were initially called for in August 2012, and submissions have been received up until the time of preparation of this report.

Other Exhibition Materials

In addition to the Conservation Management Plan (*Attachment 1*) and Discussion Paper (*Attachment 2*), the exhibition materials included a Photographic Index of Identifiable Graves (*Attachment 3*); Frequently Asked Questions, a copy of the Original Cemetery Burial Records; and a video. These documents remain available to download from Council's website.

Film – Not Forgotten: The Story of Waterfall General Cemetery

In recognition of the remote location, inaccessibility and safety issues relating to the Cemetery, it was not possible for stakeholders to visit the Cemetery during the exhibition period. For this reason, and in recognition of the non-local audience relevant to the site, Council staff felt that there was a need to provide the community and stakeholders with an alternative way of engaging with the site during the exhibition. As a result, Gooseboy Productions were engaged to produce a 15 minute documentary style short film titled "*Not Forgotten: The Story of Waterfall General Cemetery*".

Registered stakeholders, including many descendants of those buried in the Cemetery were invited to provide material for inclusion in the film. A number of family descendants, as well as local researchers contributed to, and featured in the film. The

film provided a positive focus to the exhibition process, and was screened at an Exhibition and Film Launch held on 19 September 2013.

Ongoing Research and Investigations

During the process of Council's investigations, Mrs Carol Herben, a member of Council's Heritage Committee and avid local researcher, provided a great deal of support and assistance with research and historical information related to the site. Mrs Herben, with the support and assistance of John Herben and Val Hurry, is currently undertaking detailed research into the lives and history of many of those buried within the Cemetery. Mrs Herben intends to continue this research and to publish a book on the history of the Cemetery.

This research has already led to the identification of 11 World War I soldiers who are buried in the Cemetery, 10 of which had previously been unidentified and which have been reported to the Australian War Graves Commission. A recent series of articles in the Wollongong Advertiser featured the stories of these 'forgotten' soldiers.

Environmental Assessments – Flora and Fauna

Two separate environmental assessments have been undertaken on the site, with a focus on flora and fauna. This work has been undertaken by suitably qualified and experienced Council staff. The assessments revealed that whilst the site is in good condition and has re-established itself as an environmental area, no threatened fauna or endangered species are known to occur within the site.

It will be necessary to prepare vegetation mapping and to build vegetation management planning into the process of consideration for any future clearing and environmental management works. The findings of these assessments are generally supportive of the management of the Cemetery site as recommended within this report.

PROPOSAL

Endorsement of Conservation Management Plan

This report proposes that the future management of the Waterfall General (Garrawarra) Cemetery should be guided by the Policies and Recommendations of the Conservation Management Plan (*Attachment 1*). The report recommends that Council endorse this document to ensure that its Policies and Recommendations are implemented in the future management of the site.

Future Custodianship

The Discussion Paper (*Attachment 2*) outlined two options for future custodianship of the site:

Option 1 – Retain the site in Council's Care and Control; and

Option 2 – Pursue a hand back of the Site to the State Government.

Option 1 was strongly supported by the community during the consultation process. The submission from Crown Lands also supported Council remaining as ongoing manager. The acceptance of this option will necessitate an acceptance of some form of management response and will necessarily carry a cost burden for Council. It is noted that Council is responsible for other local Cemeteries which are not 'operational'. These include the Berkeley Pioneer Cemetery, located on Industrial Road Unanderra, and the West Dapto Settlers Cemetery, located on the corner of West Dapto Road and Reddall's Road, Kembla Grange.

The acceptance of Council's custodial responsibility for the Cemetery would also ensure that Council has the ability to oversee the implementation of the Conservation Management Plan.

Option 2 would have a significant cost advantage for Council if the State Government were willing to accept responsibility for the site. Given the intrinsic link between the Waterfall Cemetery site and the broader Sanatorium site, the rest of which remains in State Government care and control, State Government care and control responsibilities would offer some advantage in terms of the management of State heritage values. It is also relevant that most of those buried within the Cemetery are not tied to the local community and that up until the 1967 transfer the Sanatorium and Cemetery was run very much independently of the community of Wollongong by the Department of Health.

The community has however expressed concern about the likelihood of the State Government implementing the recommendations of the Conservation Management Plan. Some have noted the poor condition of many Sanatorium buildings and the lack of maintenance by the State. It is also questionable whether the State would give consideration to a potential hand-back of the site. In addition, a hand-back, after a period of 47 years of Council custodianship without maintenance, is likely to result in criticism and concern from the community and stakeholders. This is particularly likely given the overwhelming result of the consultation, which indicated very strong support for Council to retain the sites management.

It is therefore proposed that Council support Option 1 and retain custodianship for the Waterfall General (Garrawarra) Cemetery. In recognition of the unusual circumstances around the sites history and handover and in recognition of the State Heritage significance it is also proposed that Council write to the Premier of NSW, the Minister for the Illawarra, the Minister for Heritage and to the Member for Heathcote, seeking State Government funding support toward future management of the site.

Management Strategy

The discussion paper detailed three strategy options for the future management of the site:

- Option 1: Minimal Intervention;
- Option 2: Bush Cemetery Management; and
- Option 3: Establish a Formal Cemetery.

Option 1 was not supported by the Conservation Management Plan as this would inevitably result in the continued loss of historic evidence of the Cemetery through the continued resumption of the site by vegetation. Further, the ongoing risk of large bush fires through the site, such as the one that occurred in 2001, could result in significant loss of remaining fabric, and further damage to the remaining identifiable features and monuments in the site.

Option 2 was presented in the Discussion Paper in a manner consistent with the recommendations and policies outlined in the Conservation Management Plan.

Option 3 was also not supported by the Conservation Management Plan, as the restoration of the site into a formal Cemetery would ignore the importance of the long period in which the Cemetery was 'forgotten'. This period is significant in that it speaks to the history of the Tuberculosis virus, the stigma attached to the disease and the isolation of sufferers from the community, both in life and death.

The submissions received in relation to these options were overwhelmingly in favour of a Bush Cemetery Management model consistent with the Conservation Management Plan and Options 1 and 3 received little support.

It is noted that a bush cemetery is not a 'natural burial ground' which is a form of active cemetery.

It is therefore proposed that Council adopt a Bush Cemetery Management model consistent with the recommendations of the Conservation Management Plan as presented by Option 2 in the discussion paper.

Visitor Access

The Discussion Paper detailed five options for future accessibility of the Cemetery ranging from formal vehicle access to no access. Submissions were received in support of all options, with the exception of the no access option. This indicates desire from stakeholders to be able to visit the site. The access option with the most support during the exhibition was the idea of holding regular public open days.

Given the current lack of legal access, the isolation of the Cemetery, risk of vandalism and bushfire risk, the Open Day option provides a range of advantages in that it allows for the control and supervision of Cemetery visitation. It is noted that there is anecdotal and physical evidence that there are people who visit the site and this is likely to continue as the construction of site fencing is not considered a suitable solution.

The holding of regular public open days would require resourcing to allow for the organisation and running of these days. These open days could potentially be linked with the Garrawarra Centre's existing program of open days and this should be further discussed with the Department of Health. It is also possible that an active 'Friends Group', if established, could take on a role in the running of open days.

Legalised Access

At present Council has no legal access to the Cemetery as the site is surrounded by Crown Land and is separated from the fire trail (the former Illawarra Road). It is

necessary to obtain permission from the Department of Health, and to obtain a key to the fire trail gate from the Garrawarra Centre in order to access the site. The Department of Trade and Investment, Crown Lands Division has provided advice indicating that they recognise the need for legal access, and feel that a legal easement or right of way can be created along existing fire trails to provide this link to the site. An easement from the south would create a more direct access to the site and is likely to provide a preferable outcome.

It is proposed that Council support the progression of negotiations with the Crown to establish legal access to the site in the form of an easement or right of way.

Initial Works Program

In order to allow for the implementation of the recommended management strategy, this report proposes that Council commence work towards the development and implementation of an initial works program. This would be targeted at bringing the site into a manageable condition as recommended by the Conservation Management Plan.

The initial works program would be staged to allow for the development of plans, work methods and necessary approvals and permits in 2014/2015. The completion of this planning stage would then allow for more refined costings of the implementation, and allow Council to seek available grants and funding assistance towards the plans implementation.

The implementation and/or construction phase is proposed to occur during 2015/2016 subject to funding through the Annual Plan. This would likely involve the clearance of vegetation from the central access drive to allow for maintenance vehicle access to the site, clearing of deadwood and fuel build-up throughout the site, and selective pruning/removal of vegetation to ensure site safety and ongoing conservation of remnant graves and significant fabric. It is likely that these works will require archaeological supervision.

Land Use Planning/Zoning

The Discussion Paper outlined three potential options for the zoning of the site.

It is proposed that the E3 Environmental Management zoning for the site be retained. This zone is considered appropriate for the future management of the site as recommended in the report and would allow for the recognition, protection and management of the cultural and social values.

An SP2 Special Uses (Cemeteries) zone is considered more suitable to an active Cemetery environment and is not considered appropriate to the management of the site as a historic bushland cemetery within an environmentally sensitive setting.

An E2 Environmental Conservation zoning could complicate the implementation of the proposed management response, including the strategy to remove vegetation.

Heritage Listings

The Conservation Management Plan recommended that the existing heritage listings for the “Garrawarra Hospital Cemetery” and the “Garrawarra Hospital” should be amalgamated and that the Garrawarra Hospital Heritage Conservation Area boundary should be expanded to cover both the hospital and the cemetery.

The discussion paper outlined three potential options for consideration, including the retention of the present listings, the amalgamation of the listings as recommended in the Conservation Plan, and a third option, which provided for the retention of the existing listings for the cemetery and hospital (separate) and the expansion of the conservation area boundary to capture the two parts of the site, as well as the area in between.

The consultation process provided minimal input to this decision. Council’s Heritage Officer has however recommended that Option 3 be selected. This would provide for the retention of separate listings for the cemetery and hospital in Part 1, Schedule 5 of the Wollongong Local Environmental Plan 2009 and the expansion of the conservation area curtilage to capture both parts of the sites.

In addition, a number of amendments to the listing details are proposed to be implemented, as well as the expansion of the cemetery’s curtilage to reflect the recommended curtilage identified in the Conservation Plan.

It is proposed that a draft Planning Proposal be prepared to amend the Wollongong Local Environmental Plan 2009, as follows:

- a Amend the listing of Item 61028 in Schedule 5 – Environmental Heritage, Part 1 to:
 - i Change the item name from “Garrawarra Hospital Cemetery”, to “Waterfall General (Garrawarra) Cemetery”; and
 - ii Add Lot 3 DP 840501 and Lot 622 DP 752033 to the property description;
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- c Amend the Heritage Map to expand the curtilage of the “Garrawarra Hospital Heritage Conservation Area” to include the “Waterfall General (Garrawarra) Cemetery”.

It is proposed that the draft Planning Proposal be referred to the NSW Department of Planning and Environment for Gateway determination, and if approved, be placed on public exhibition. Given the impact of the proposed amendments on Crown Land in the care and control of the NSW Ministry of Health, formal notification of these changes will be made to the Ministry for comment.

State Heritage Register Nomination

The Conservation Management Plan has recommended that the site meets the criteria for listing on the State Heritage Register. It is proposed that a formal nomination for the site, as part of the broader Waterfall sanatorium site, be prepared using the detailed

significance assessment within the Conservation Management Plan, and that this State Heritage Nomination be submitted to the NSW Heritage Council for consideration.

It is noted that this nomination would also impact on the NSW Ministry of Health's Garrawarra Centre site. The Ministry of Health were invited to provide comment in relation to this as part of the exhibition process. Despite a follow up letter being sent, no comment or submission has been received. Notification of the Ministry of Health of the formal nomination is a formal part of the NSW Heritage Council's processing of State Heritage nominations.

Friends Group

The establishment of a Friends Group offers an opportunity to allow for an ongoing engagement with stakeholders and key interest groups/family members in future decision making related to the site. Further, an active Friends Group could potentially support Council staff with regular site monitoring and maintenance. In addition, the Friends Group could potentially play a role in the running of cemetery open days.

Interest in being involved in such a group has been high, with 24 persons already indicating a willingness to be involved (in some form) in a Friends Group.

Whilst the establishment and administration of a 'Friends Group' would require some resourcing, particularly if they take an active role in maintenance functions (due to public liabilities), it also presents significant potential advantages. It is recommended that during the course of implementation of the recommended initial works program, the potential membership and function of a 'Friends of Waterfall (Garrawarra) Cemetery Group' should be further explored and considered.

CONSULTATION AND COMMUNICATION

Identification of Stakeholders

Community consultation has formed a key component of the project since the previous Council resolution of 27 August 2012. At this time, Council called for members of the community to register an interest in the site, in an attempt to identify and register stakeholders and those with family connections to the site. This process resulted in the identification of over 60 registered stakeholders, 18 of whom had declared a family connection to the site prior to the commencement of a formal exhibition process. Those 18 registered stakeholders with family connections to the site were invited in April 2013 to contribute material, photos and stories that could be used in the production of the film.

Challenge of Non-Local Audience

Due to limited connections between the cemetery and the local community, as well as the broad (international) catchment of those buried in the Cemetery, the exhibition provided an interesting challenge. In order to truly engage with stakeholders it was necessary to look at creative means of spreading the word about the project. As a result a Community Engagement Strategy was developed to try and broaden Council's normal approaches to engagement in an attempt to capture a broader audience. The

development of the film also allowed for the dissemination of information about the launch in an accessible format for those remote to the Cemetery.

This approach targeted, and achieved, coverage in major newspapers including the Sydney Morning Herald, as well as involving distribution of the exhibition materials through Family History networks, online Family History websites and other creative platforms.

Exhibition and Film Launch

Registered Stakeholders, local heritage interest groups, and the broader community, were invited to attend the Exhibition and Film launch, on 19 September 2014. The launch was attended by over 60 people and those present included two groups of family descendants who travelled from Queensland specifically to attend the event.

The formal exhibition period was advertised over the period 20 September 2013 to 15 November 2013, however, the exhibition material remained available after this date, and all submissions received up to the date of report preparation have been included in this report. During the exhibition all of the exhibition materials were made available via an online exhibition page accessed from the “Have Your Say” section of Council’s website. The film was also available for viewing via a link from this site. In addition, copies of all exhibition documents, as well as the film, were made available for viewing at all Wollongong City Library branches.

Participation

The consultation process was very successful and achieved considerable participation and response. In summary:

- The Exhibition and Film launch on 19 September 2014 was attended by over 60 people;
- The project consultation webpage was accessed 9,300 times;
- 8,383 documents were downloaded;
- The film, *“Not Forgotten: The Story of Waterfall General Cemetery”* was viewed 1,470 times; and
- An information session, held on Thursday 24 October 2013, was attended by five people.

Number of Submissions

- Fifty (50) community/stakeholder submissions were received;
- Three government agency submissions were received;
- Nineteen (19) people completed the online survey (five of these also wrote a written submission);
- Twenty-one (21) submissions declared specific family connections to the site; and

- Two people shared the story of their connection to the site on the 'Stories' section of Council's webpage.

Outcomes of the Consultation Process

A detailed summary of the submissions received throughout the exhibition process is provided in **Attachment 4** to this report. The analysis of the results of these submissions in relation to the key issues identified within the discussion paper, are outlined below.

Future Custodianship

The Discussion Paper detailed two options for future management of the Cemetery. The feedback from the submissions in relation to these options has been analysed and is shown graphically in Figure 1, below.

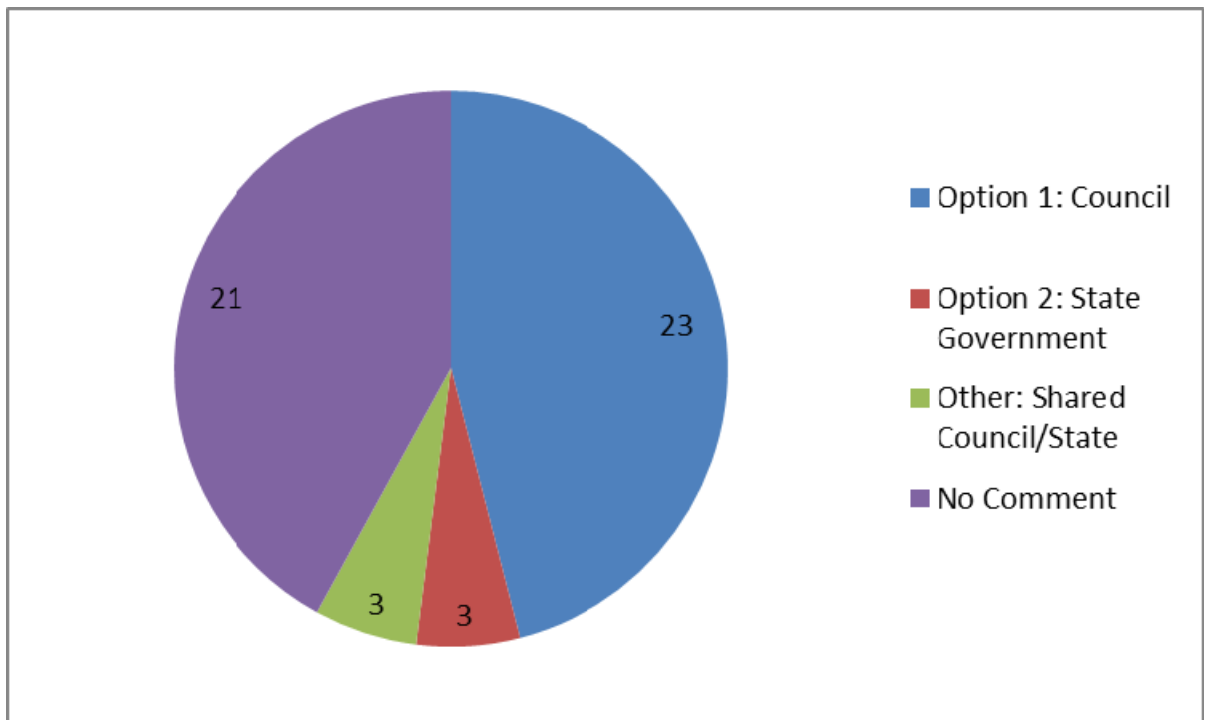


Figure 1: Submission Data for Future Custodianship Options (number of submissions)

The response in relation to this question was overwhelmingly in favour of Council retaining custodianship of the Cemetery. Many submissions indicated that this was preferred for one (or more) of the following reasons:

- View that Council is more likely to care for the site than the State;
- Council has a responsibility after years of no maintenance; and
- The project would lose momentum if Council hands the site back to the State.

No advice or indication has been received from any NSW Government Department around the potential for the site to be handed back to the State, and as such, Option 2 remains theoretical only.

Several submissions did indicate that the State Government should share the responsibility of future management of the site and particularly the costs of bringing the site under control and then, future maintenance.

Future Management Strategy

The discussion paper presented three options for the future management strategy, or overall management approach for the Cemetery. The submission data has been analysed and is displayed in Figure 2, below.

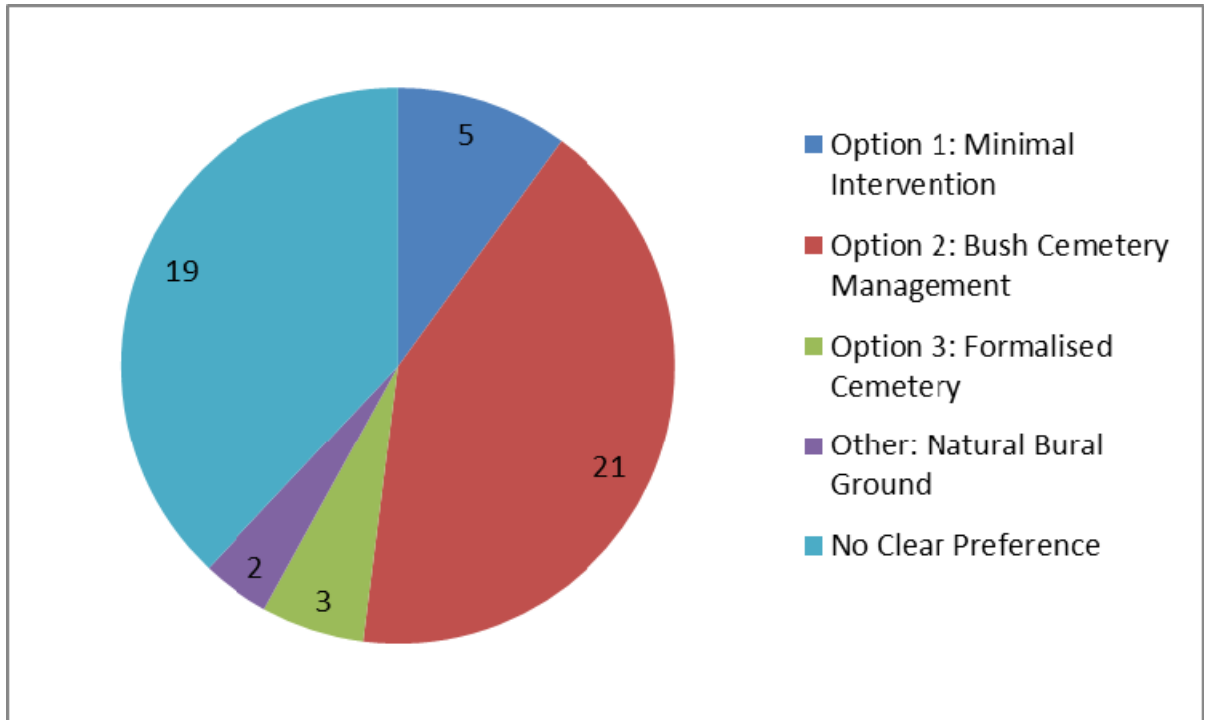


Figure 2: Submission Data for Future Management Strategies (number of submissions)

The overwhelming response from the community about the future management strategy for the Cemetery was to pursue a Bush Cemetery Management Model. This option is consistent with the recommendations of the Conservation Management Plan.

It is of note that two submissions suggested the possibility of using part of the former Cemetery as an active, 'natural burial ground'. This suggestion has been considered, as it could provide a potential means of finance towards ongoing maintenance and upkeep. It is considered however, that due to the issues relating to the isolation of the site, difficulties with access, risk (particularly from bushfires), and the likely heritage impacts of such a proposal, the site is not considered appropriate for this purpose. Further, discussions with Council's Property Division have indicated that recent research has found that there is insufficient demand for a natural burial ground at this time and that uptake of plots in existing natural burial grounds in New South Wales has been limited.

Access Options

The Discussion Paper presented five potential options for future site accessibility. The analysed submission data is shown graphically in Figure 3, below.

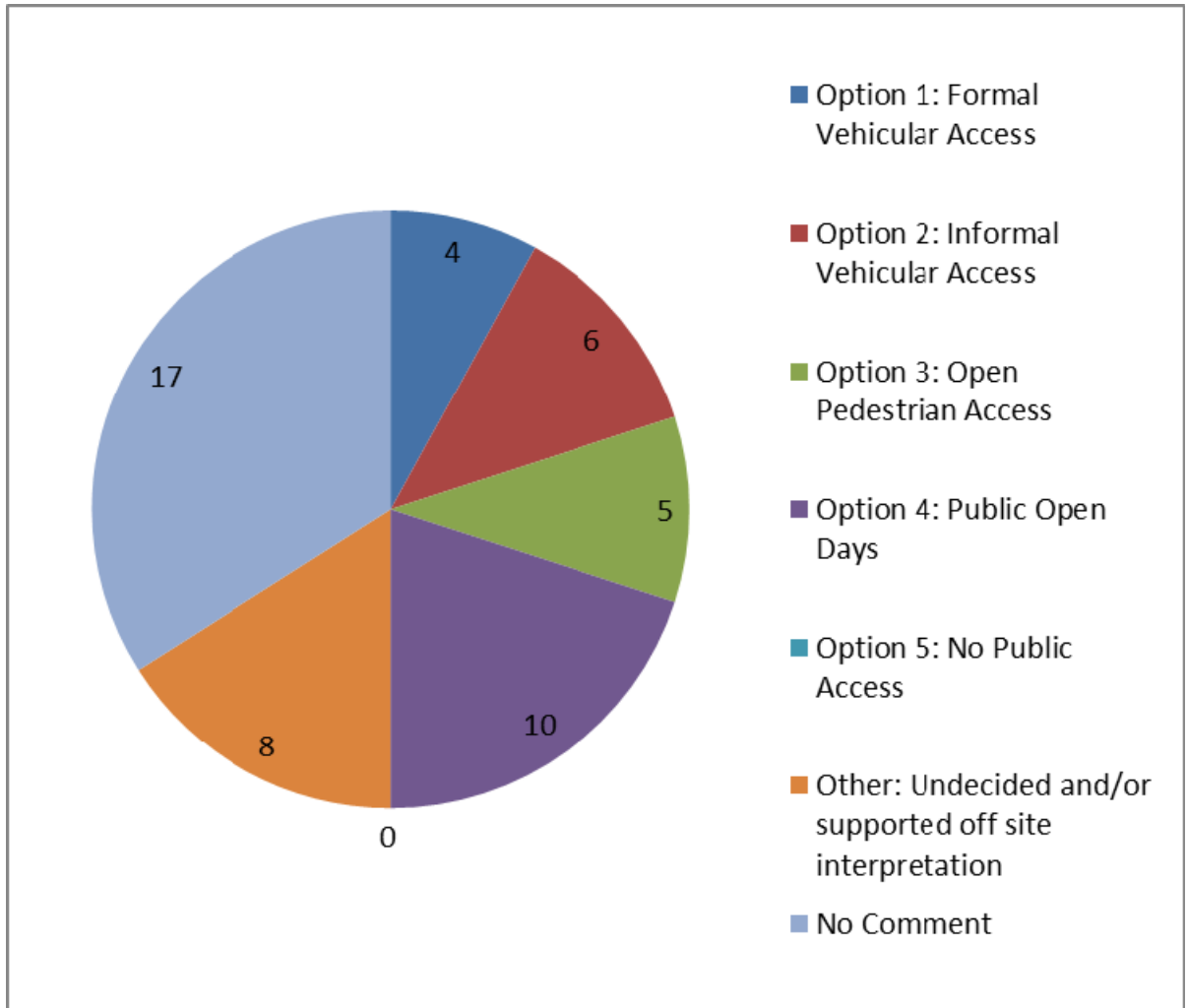


Figure 3: Submission Data for Access Options (number of submissions)

The feedback in relation to access was variable, with submissions received in support of each option, with the exception of 'Option 5: No Public Access' (no support). The option supported by the most submissions was to hold public open days. Several submissions suggested that a memorial wall should be placed within the Garrawarra Centre site, to allow for the interpretation and memorialisation of those buried within the site.

Heritage Listings

Seven submitters supported the State Heritage listing of the site, with three specifically stating the cemetery site listing should be amalgamated with the Garrawarra Hospital listing.

One submitter did not support the State Heritage listing of the site.

Forty-two (42) submitters did not offer comment on the State Heritage listing.

Friends Group

Twenty-four (24) submitters indicated support for, and a willingness to be involved in, a 'Friends of Waterfall (Garrawarra) Cemetery Group'. It is noted however that several of these indicated that their capacity to contribute to site management would be limited due to their place of residence being too far from the site. One of these submissions indicated that there are a group of nurses who work at the Garrawarra Centre who would also be interested in joining the group.

The Helensburgh Landcare Group, in their submission, supported the idea of a friends group but offered caution about the difficulties of recruiting active members for such a group. They noted that it may be difficult to maintain longer term interest in the group.

Land Use Planning/Zoning

The submissions received in relation to the exhibition made no direct comment in relation to the future land use zoning for the site.

Agency Submissions

Whilst a wide range of State government agencies, along with Members of Parliament were invited to participate in the consultation process, only three agency submissions were received throughout the process. These submissions are detailed in *Attachment 4* to this report.

Wollongong Heritage Advisory Committee

The Wollongong Heritage Advisory Committee have played an important role in informing the project since its inception and have received regular reports and updates on progress since 2011 when the site came to Council's attention. The Committee have provided valuable input and insight to the project process.

On the 13 November 2013, the Wollongong Heritage Advisory Committee considered a report on the project and recommended that:

- 1 *Council support the following options detailed in the discussion paper:*
 - a *Future Custodianship: Retain in Council's Care and Control;*
 - b *Future Management Strategy: Establish a Bush Cemetery;*
 - c *Access Options: Public Open Days;*
 - d *Planning/Land Use Zoning: Retain E3 Environmental Management zone; and*
 - e *Heritage Listings: Consolidate the existing Heritage Listings;*
- 2 *The nomination of the site for listing on the State Heritage Register be supported; and*
- 3 *The formation of a 'Friends Group' to assist with future management and decision making be supported.*

Aboriginal Reference Group

In recognition of the known Aboriginal burials within the Cemetery (as identified from the burial register), as well as the significance of the land on which the Cemetery is located, the exhibition documents and management options were discussed with the Aboriginal Reference group at its meeting of 27 November 2013. The group indicated that there were a number of people buried within the site with family connections to Reference Group members, and to other local Aboriginal people.

The group were generally supportive of the project but did not provide any advice to inform Council in relation to the options of future management.

PLANNING AND POLICY IMPACT

This report contributes to the delivery of Wollongong 2022 under the objective 1.4 - *Community Awareness and Appreciation of Heritage is increased* (Community Goal 'We Value and Protect our Environment').

It specifically delivers on core business activities as detailed in the Land Use Planning Service Plan 2014-15.

RISK ASSESSMENT

During the course of the project, Council staff undertook a detailed risk assessment of the site, and the project, to identify potential risks. The major identified risks are detailed below, and the effect of the recommendations of this report on these risks is briefly discussed below:

People (Staff and Public)

Given the unmanaged state of the Cemetery, the site currently presents a significant risk of injury to staff or visitors to the site from trip hazards, and tree-fall. This risk is mitigated only by the isolation of the site, and the fact that it receives few visitors. This isolation of the site also adds to the severity of the risk however, in that if someone were injured, the site would make medical care and transportation difficult.

The management model and response recommended in this report is expected to significantly reduce the risks to visitors to the site by reducing trip hazards, and hazardous vegetation, and making the site more accessible by clearing the central access driveway.

Conservation (Damage to Graves)

The remaining physical evidence within the site, including grave markers, remains of boundary fencing and entry gates is currently being damaged and gradually lost through the gradual resumption of the site by vegetation. Many graves have already suffered damage through tree fall and root uplift due to the unmanaged state of the Cemetery.

The proposed management response would reduce the future potential for tree-fall by providing for regular monitoring of the vegetation on the site and removal of selected

vegetation that is likely to cause damage. The physical removal and/or pruning of vegetation within the site will need to be carried out with caution to avoid further damage.

Bushfire (Fuel Loads)

The site currently contains a very large amount of deadwood that would act as a significant fuel source in the event of a fire. The Rural Fire Service has expressed concern in relation to this risk and the potential threat the site poses as an ignition point that could place the Garrawarra Centre and other surrounding infrastructure at risk. A fire, such as the one that went through the site in 2001, could cause significant risk to anyone visiting the site, but also pose a significant threat to the conservation of remaining historic fabric within the site.

The proposed management model would result in a significant reduction to the fuel loads at the site and would significantly reduce the risk of fire at the site. A reduction in fuel loads is also likely to reduce the intensity of any potential fire and therefore reduce the potential damage to the significant fabric in the event of a fire incident.

Vandalism

Whilst there is some evidence that the site has been subject to vandalism and anti-social behaviour in the past, there is little evidence to suggest recent vandalism at the site. This lack of vandalism is likely to be due to the hidden and isolated nature of the Cemetery.

The reopening of the central access driveway and increasing public awareness of the site resulting from the present project could inadvertently open the site to undesirable visitors who could deliberately or inadvertently cause damage to the significant fabric at the site. It will be necessary to take a cautious approach to the implementation of the management model proposed within the report to ensure that the site does not become an easy target for vandals and/or antisocial behaviour.

Reputation

The history of the site and the lack of maintenance since Council took over the management of the site has the potential to damage Council's reputation. The development of the current project has raised awareness of the issue and in some cases, public expectation that something will be done to improve the situation.

Should Council choose not to proceed with the active management of the Cemetery, there is a risk that Council's reputation may be damaged as the community and stakeholders are generally anxious to ensure that the site's management is improved.

FINANCIAL IMPLICATIONS

In considering the financial implications relevant to this site it is important to acknowledge and understand that this is an existing Council asset. Whilst Council has not undertaken active management on the site during the period of custodianship, and as a result there is a current backlog of maintenance that requires a 'catch up' process.

The recommendations of this report will inevitably result in cost implications and require finance and resourcing. These implications are detailed below with estimated costing's provided.

The development of the initial works program is likely to cost in the order of \$20,000 - \$30,000, and would include the preparation of plans/designs, vegetation mapping, preparation of relevant environmental assessments, detailed heritage/conservation advice and relevant approval processes.

The implementation of the initial works program is likely to cost in the order of \$180,000. This would cover the cost of works to clear the central access road (using machinery), as well as manual labour to clear deadwood from throughout the site, as well as removing selected vegetation that poses a risk to people, or conservation values. In addition, this estimated costing allows for the construction of an access gate at the driveway entry and installation of basic interpretation and regulatory signage at the property entry.

Following this initial works program, it is anticipated that the site would require an ongoing operational budget allocation of a minimum of \$20,000 per annum to service regular inspections and maintenance of the site and vegetation, hosting of regular open days, as well as the potential establishment and running of a 'Friends of the Cemetery Group'.

There are a number of potential grant funding opportunities that may provide assistance with the costs of, in particular, the initial works program. These grant funding opportunities include potential funding through the Crown Reserves Fund and the NSW Heritage Grants Program. The presence of a significant number of military graves on the site, as identified in recent research has also raised the question of the potential for funding through the Office of Australian War Graves, particularly given that 2015 marks the 100th Anniversary of ANZAC.

CONCLUSION

The Waterfall General (Garrawarra) Cemetery is a unique site with strong and special heritage significance, at a State level. The site provides unique evidence of the past treatment, and failures in treatment, of the infectious disease Tuberculosis. The Waterfall General (Garrawarra) Cemetery Conservation Management Plan proposes a sound basis for future management. This management model has been strongly supported by stakeholders, and the broader community, through the community consultation process. The recommendations of this report are commended to Council as a positive step towards achieving conservation of this important historic site.



Waterfall General (Garrawarra) Cemetery: Conservation Management Plan

FINAL

Prepared for Wollongong City Council

07 June 2013

Biosis offices

AUSTRALIAN CAPITAL TERRITORY

Canberra

Floor 1, Unit 3, 38 Essington Street
Mitchell ACT 2911

Phone: (02) 6241 2333
Fax: (03) 9646 9242
Email: canberra@biosis.com.au

NEW SOUTH WALES

Sydney

Unit 4, 119 McEvoy Street
Alexandria NSW 2015

Phone: (02) 9690 2777
Fax: (02) 9690 2577
Email: sydney@biosis.com.au

Wollongong

8 Tate Street
Wollongong NSW 2500

Phone: (02) 4229 5222
Fax: (02) 4229 5500
Email: wollongong@biosis.com.au

QUEENSLAND

Brisbane

Suite 4 First Floor, 72 Wickham Street
Fortitude Valley QLD 4006

Phone: (07) 3831 7400
Fax: (07) 3831 7411
Email: brisbane@biosis.com.au

VICTORIA

Ballarat

506 Macarthur Street
Ballarat VIC 3350

Phone: (03) 5331 7000
Fax: (03) 5331 7033
Email: ballarat@biosis.com.au

Melbourne (Head Office)

38 Bertie Street
Port Melbourne VIC 3207

Phone: (03) 9646 9499
Fax: (03) 9646 9242
Email: melbourne@biosis.com.au

Wangaratta

16 Templeton Street
Wangaratta VIC 3677

Phone: (03) 5721 9453
Fax: (03) 5721 9454
Email: wangaratta@biosis.com.au

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Abbreviations

CMP	Conservation Management Plan
EP&A Act	Environmental Protection and Assessment Act 1979
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
ICOMOS	International Council on Monuments and Sites
OEH	Office of Environment and Heritage
SoHI	Statement of Heritage Impact
WCC	Wollongong City Council

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Summary

This Conservation Management Plan (CMP) was commissioned by Wollongong City Council (WCC) to provide guidance on the future management of significant heritage values within the Waterfall General Cemetery. The Cemetery was established in 1909 as part of the Waterfall Hospital for Consumptives (renamed the Waterfall State Sanatorium for Tuberculosis in 1914) and was actively used up to 1949. Responsibility for care and control of the Waterfall General Cemetery was handed to WCC by the State in 1967 under the provisions of the *Local Government (Control of Cemeteries) Amendment Act 1966*, which appointed Councils throughout New South Wales as Trustees of public cemeteries. Little or no maintenance activities have been undertaken at the Cemetery since this handover of control and the site is presently heavily overgrown.

That Waterfall General Cemetery, Waterfall, New South Wales is regarded as being primarily significant for its historical role as a cemetery for tuberculosis patients from Waterfall State Sanatorium from 1909 to 1949 and the surviving fabric of the Cemetery demonstrates management of a cemetery in an isolated region. The challenge for heritage conservation at this site is to incorporate sound conservation policy with the requirements of ongoing maintenance in an isolated location. The underlying philosophy in the management of cultural heritage is based on the ICOMOS Burra Charter, which is to do as much as necessary and as little as possible. The approach to the development of the conservation policy is to retain and conserve the site elements of exceptional and high significance and develop policies to inform and guide management of the Cemetery.

Historical relics and features within the study site are protected by the *Heritage Act 1977* and the Wollongong 2009 Local Environment Plan (LEP). Recommendations have been made in Section 6 for the management of the heritage values of the Cemetery. A summary of conservation requirements for each site element is provided below in Table 1.

The Waterfall General Cemetery is currently listed on the Wollongong 2009 LEP (Garrawarra Hospital Cemetery Item 61028) and separately from the former Waterfall State Sanatorium (now the Garrawarra Aged Care Centre). While separated administratively in 1967, previously the sites were directly connected by Waterfall State Sanatorium operations. In order to ensure that the associated heritage values of both sites are appropriately managed, consideration should be given to listing the sites as one entity on the Wollongong LEP and extending the conservation area for the Garrawarra Aged Care Centre to include the Cemetery.

Given the heritage values of both sites and their importance in the history of managing tuberculosis in NSW, consideration should be given to the nomination of both sites as a single item to the State Heritage Register. While nomination to the State Heritage Register is not guaranteed, a successful listing would make the site eligible for heritage conservation grants.

Recommendations

The following recommendations are made in regards to the Waterfall General Cemetery.

Recommendation 1: Nomination of the Waterfall General Cemetery and Waterfall State Sanatorium sites to the State Heritage Register

As per Policy 9, it is recommended that the Waterfall General Cemetery and Waterfall State Sanatorium (now the Garrawarra Aged Care Centre) should be nominated to the SHR as a combined listing.

Recommendation 2: Update Wollongong LEP 2009 Heritage Schedule

As per Policy 9, it is recommended that the Waterfall General Cemetery and Waterfall State Sanatorium (now the Garrawarra Aged Care Centre) should be updated on the Wollongong LEP 2009 Heritage Schedule as a single entity.

Recommendation 3: Adoption of the Conservation Management Plan

As per Policy 1, Wollongong City Council should adopt the CMP for the Waterfall General Cemetery site as the document guiding appropriate change to the significance of the site.

Recommendation 4: Review of the Conservation Management Plan

As per Policy 2, the Conservation Management Plan should be reviewed on a regular basis, preferably at least once every ten years, or when new material which has the potential to supplant a present policy, is discovered.

Recommendation 5: Managing Change

Where changes to the study site have the potential to impact on heritage items, a SoHI should be prepared. Using this CMP as a guiding document, SoHIs should be prepared in accordance with Heritage Council guidelines for SoHI (Appendix 1) and should only be as detailed as required by the proposed work. Acceptable change should be based on Table 1.

Table 1: Summary of site elements and their conservation requirements

Element	Significance	Applicable Conservation Policies (marked with X if applicable)						Statement of Heritage Impact Required (Y = Yes, N = No, U = Unacceptable action, C = acceptable for conservation purposes only, N/A = Non applicable)	
		Policy 3	Policy 4	Policy 5	Policy 6	Policy 7	Policy 8	Demolition or Removal	Alteration of fabric
Access Road, Fencing and Western Entrance	Moderate	X	X		X	X		U	C
Radiata Pine Remains	Moderate	X	X			X		C	C
	Intrusive					X		Y	Y
Grave Plantings	Moderate	X	X			X		U	C
Silvertop Ash Ironstone Woodland	High	X		X				C	C
Graves	Exceptional	X	X		X	X	X	U	C
Car Wreck	Intrusive							Y	Y

1 Introduction

1.1 Project Background

This Conservation Management Plan (CMP) was commissioned by Wollongong City Council (WCC) to provide guidance on the future management of significant heritage values within the Waterfall General Cemetery. The Cemetery was established in 1909 as part of the Waterfall Hospital for Consumptives (renamed the Waterfall State Sanatorium for Tuberculosis in 1914) and was actively used up to 1949. Responsibility for care and control of the Waterfall General Cemetery was handed to WCC by the State in 1967 under the provisions of the *Local Government (Control of Cemeteries) Amendment Act 1966*, which appointed Councils throughout New South Wales as Trustees of public cemeteries. Little or no maintenance activities have been undertaken at the Cemetery since this handover of control and the site is presently heavily overgrown.

The specific aims of the CMP are to:

- Review the existing history, records and documentation of the Waterfall General Cemetery.
- Investigate the extent and nature of all remaining evidence within the Waterfall General Cemetery site.
- Assessment of the significance of the Cemetery site, including its history as part of the broader Waterfall Sanatorium site.
- Consultation with relevant interest groups including the Illawarra Historical Society (IHS) and the Helensburgh Historical Society (HHS).
- Development of Conservation Policies and documentation in accordance with the guidelines of the NSW Heritage Council for preparation of a Conservation Management Plan and Kerr's *The Conservation Plan* (2004).

1.2 Study Area

The Waterfall General Cemetery (the study area) is located on the east side of the old Illawarra Road, south of the Garrawarra Centre for Aged Care and within the Wollongong Local Government Area (Figure 1). The layout of the Cemetery covers the full extent of Lot 4 DP 840501 and is just under one ha in size (Figure 2). The Cemetery is located on relatively flat ground of a spur crest that runs south from the Garrawarra Centre (formerly the Waterfall State Sanatorium).

1.3 CMP Methodology

This CMP has been prepared in accordance with the Australia ICOMOS *Burra Charter* 1999, James Semple Kerr's *The Conservation Plan* (2004) and guidelines provided by the NSW Heritage Office Model Brief (1996) and suggested table of contents for a CMP, the flow chart of which has been employed as the basis for the structure of the CMP.

The Australia ICOMOS Charter for the Conservation of Places of Cultural Significance (Burra Charter 1999), provides a framework for which heritage management in Australia is considered. The overarching guidelines are:

- *Places of cultural significance should be conserved;*

- *The aim of conservation is to retain the cultural significance of a place;*
- *Conservation is an integral part of good management of places of cultural significance; and,*
- *Places of cultural significance should be safeguarded and not put at risk or left in a vulnerable state.*

Good management of sites with heritage significance requires an understanding of how to best apply the Burra Charter principles to a site.

1.4 Planning Framework

Other relevant legislation, planning instruments and guidelines that have been used to inform this CMP include:

- *Environmental Protection and Assessment Act 1979 (EP&A Act);*
- *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act);*
- *Aboriginal and Torres Strait Islander Heritage Protection Amendment Act 1987;*
- *Heritage Act 1977 (amended 1998);*
- *ICOMOS Australia Burra Charter 1999 (the Burra Charter); and,*
- *National Parks & Wildlife Act 1974 (NPW Act) (as amended 2010).*

1.5 Definitions

The terms fabric, conservation, maintenance, preservation, restoration, reconstruction, adaptation, compatible use and cultural significance used in the CMP are as defined in the Burra Charter.

Place means site, area, land, landscape, building or other work, group of buildings or other works, and may include components, contents, spaces and views.

Cultural significance means **aesthetic, historic, scientific, social** or **spiritual value** for past, present or future generations. Cultural significance is embodied in the place itself, its fabric, setting, use, associations, meanings, records, related places and related objects.

Fabric means all the physical material of the place including fixtures, contents and objects.

Conservation means all the processes of looking after a place so as to retain its cultural significance (as listed below).

Maintenance means the continuous protective care of the fabric, and setting of a place, and is to be distinguished from repair. Repair involves restoration or reconstruction.

Condition (not a Burra Charter definition) means the state of a place or component of a place —the extent to which it is well maintained and is physical sound.

Integrity (not a Burra Charter definition) means the degree to which a place or component of a place retains the form and completeness of its physical fabric, historical associations, use or social attachments that give the place its cultural significance.

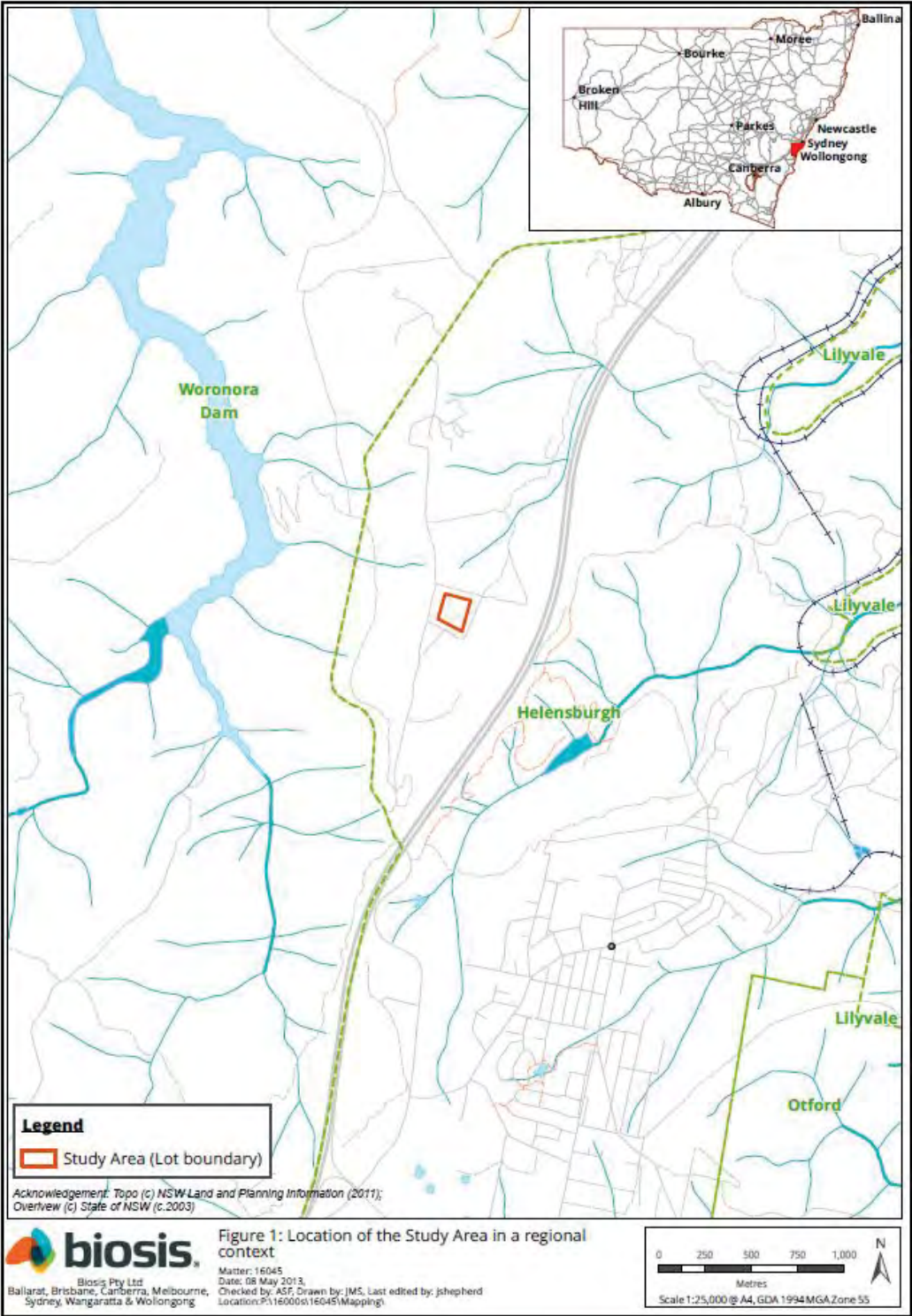


Figure 1: Location of the Study Area in a regional context



Preservation means maintaining the fabric of a place in its existing state and retarding deterioration.

Restoration means returning the existing fabric of a place to a known earlier state by removing accretions or by reassembling existing components without the introduction of new material.

Reconstruction means returning a place to a known earlier state and is distinguished from restoration by the introduction of new material into the fabric.

Adaptation means modifying a place to suit the existing use or a proposed use. [Article 7.2 states regarding use that: a place will have a compatible use]

Compatible use means a use which respects the cultural significance of a place. Such a use involves no, or minimal, impact on cultural significance.

Interpretation means all the ways of presenting the cultural significance of a place.

1.6 Limitations of the Report

This Conservation Management Plan does not relate specifically to the future development of the study area. The report focuses, therefore, on the condition of the Cemetery and potential impacts of future management options on the overall heritage setting. The context for the current study is described in Section 1. This report does not cover an extensive review of environmental and archaeological background for the study area. The historical and descriptive sections are based on the best available information accessed during the preparation of this document, but as interpretations change with new information, these may be subject to change.

1.7 Authorship

The CMP has been prepared by Asher Ford, archaeologist, and reviewed by Gary Vines, Senior Consultant Archaeologist. Mapping has been prepared by Ashleigh Pritchard and James Shepard, GIS officers.

2 Historical Background

This section discusses the history of tuberculosis in Australia and historical documentation for Waterfall General Cemetery. The history presented here of tuberculosis and the Waterfall Sanatorium is a summary appropriate enough to demonstrate the role of the Cemetery as part of a State sanatorium and its association with historic personages. More comprehensive histories for tuberculosis in Australia and the Waterfall State Sanatorium for Tuberculosis are available in Smith's 2011 *Illness in Colonial Australia* and the *Conservation Plan for Garrawarra Centre for Aged Care (Former Tuberculosis Sanatorium) Waterfall* (Howard Tanner & Associates 1993)

2.1 History of Tuberculosis in Australia

2.1.1 Consumption (1788 to 1882)

During the period of 1788 to 1882, prevalent medical understanding of tuberculosis, or consumption as it was known, considered it either a hereditary condition or linked to unhealthy occupations and recreational activities (Smith 2011: 126). While not unknown, in the early years of European settlement, incidences of tuberculosis were relatively low. The low rate of occurrence was initially linked by doctors to the hot dry climate and it was thought that dry clean air was beneficial in arresting and potentially curing tuberculosis.

English doctors prescribed a period of residence in dry arid areas such as South Australia, and many patients undertook the lengthy sea journey to partake of the "cure" in the early and mid 1800s. The high attrition rates that subsequently occurred, lead to a challenge the "hot-dry air cure" theory and it was consequently argued that a hot dry climate exacerbated rather than arrested the condition (Smith 2011: 126). By the 1860s, the reputation of Australia as a "cure" destination had been seriously discredited.

The incidence of tuberculosis in Australia increased with urbanization, a trend recognized by Thomson in his 1876 *'The histochemistry and pathology of tubercle'*. Thomson also detailed the process of causation and recognized tuberculosis as a communicable disease (Smith 2011: 127). Thomson's work was criticized in Australian circles at the time and with no known reliable cure for tuberculosis, treatment remained focused on rest and fresh air.

Care of patients typically involved either taking a "cure" by moving to a different climate or being invalided at home or public institution (Smith 2011: 126). Public treatment of tuberculosis was limited to housing in public asylums such as at the Liverpool Asylum for men (established 1851) or Newington House for women (replacing the Hyde Park Asylum in 1886) (NSW State Records 2013). Public asylums generally catered for the destitute, typically operated at over capacity and did not have a specific tuberculosis focus. A privately run sanatorium was established by J. H. Goodlet, a significant philanthropist for his time (Teale 2013), at Thirlmere in 1877 (Howard Tanner & Associates 1993: 2).

2.1.2 Communicable Disease and Open Air Treatments (1882 to 1912)

Robert Koch published his discovery of the tubercle bacillus in 1882, demonstrating that tuberculosis was communicable (Rosen 1993: 1). As the medical understanding of communicable diseases increased, a public consciousness of the issue also grew and increased pressure for precautions to prevent the spread of infection. Precautionary actions enshrined in NSW legislation included the enforcement of sanitary measures in the *Infectious Diseases Supervision Act 1881*, and reporting of infected cows and dairy workers in the *Dairies Supervision Act 1886* (Howard Tanner & Associates 1993: 2). NSW Railways forbade expectorating, including

smoking, in all carriages in 1904 and it also became a legal requirement to notify new cases of tuberculosis in Sydney (Smith 2011: 128-130).

During the 1880s and 1890s German open air treatments for tuberculosis gained worldwide popularity and began to be publicly advocated for in Australia. Cool "pure" air was considered paramount for open air treatments and a string of sanatoria was subsequently opened in the NSW highland and Blue Mountain regions (Howard Tanner & Associates 1993: 2-15). Sanatoriums in NSW included:

- The Queen Victoria Home for Consumptives also known as 'Thirlmere Home' – established in 1877 by John Goodlet and catering for 52 female patients, it was the first dedicated tuberculosis treatment center in the state. Thirlmere Home was taken over by the directors of the Queen Victoria Homes for Consumptives in 1898 (Howard Tanner & Associates 1993: 2-7).
- The Queen Victoria Homes for Consumptives, Wentworth Falls – established in 1903 for men. The sanatorium had 54 beds arranged in pavilions around a central administration block (Howard Tanner & Associates 1993: 6).
- The Bodington Private Sanatorium, Wentworth Falls - established in 1908 with 20 beds. Designed by Sydney architect George Sydney Jones, the layout was focused on open air treatments and excellent ventilation was provided in the main buildings (Howard Tanner & Associates 1993: 9).
- The R.T. Hall Sanatorium, Hazelbrook – established in 1909 with room for 16 patients (Howard Tanner & Associates 1993: 7).
- Waterfall Hospital for Consumptives – established in 1909 with room for 230 male patients. A female division was opened in 1912 with 140 beds and in 1914 discussions were held on a further expansion of 100 beds (Howard Tanner & Associates 1993: 2-7).

Only the Waterfall Hospital for Consumptives was run by the State and was constructed as a response to 15,000 person public petition submitted to the NSW Legislative Assembly in 1906. The petition decried the condition of the State asylums and requested the establishment of a dedicated "home for consumptives" for the public (Howard Tanner & Associates 1993: 2-3). As with the private sanatoriums at the time, the Waterfall Hospital for Consumptives was specifically placed in a high area for its cool clean air, seen as a critical requirement for open air treatment. The combination of proximity to public transport but relative isolation also made the Waterfall location suitable for the control of a communicable disease.

The treatment regimes for tuberculosis at Waterfall focused on improving diet, hygiene and graduated exercise programs. The isolation greatly helped in this regime as it often removed them from unhealthy environments. A picture of life for patients and their responses to treatment in the early years of the hospital is provided below in an excerpt from a Sydney Morning Herald article in 1910.

Singularly enough, there are fewer deaths at Waterfall in the winter than in the summer, the cold evidently suiting the arrest of the complaint. Consumptives are capricious in their appetites, but there is one thing they can consume at all times, and that is milk. An allowance of three pints a day is granted in addition to tea. Some add to their dictary with cocoa and other drinks, which they purchase themselves. Sodawater is a popular drink which the hospital provides. Hot and cold water are provided in the various lavatories and the strictest cleanliness is enjoined. Very few patients neglect to bathe and the regulations respecting exercise are also obeyed. Many undertake various duties about the place and it is noticeable that these are the most likely to recover. Their occupations keep them from brooding. On the whole, the patients are cheerful and happy.

One beneficial rule is that forbidding patients to cross the main South Coast road on to the catchment area but there is no hardship in that for there are miles of picturesque country in other directions. A few occasionally break bounds without permission and get to the Helensburgh hotel, and repeated offences of this character should be met by expulsion. There are plenty more patients waiting to get into the hospital. Excitement is

discouraged but some of the patients with horsey proclivities try to work up a mild enthusiasm by a penny sweep on certain horse races. If one tries to find out who runs the sweeps he will find himself up against a blank wall of unintelligence. Nobody does it but it is done. (Sydney Morning Herald 1910a)

2.1.3 The Tuberculosis Advisory Board (1912 to 1926)

In order to coordinate efforts to manage tuberculosis, the Tuberculosis Advisory Board was established to advise government in July 1912. The first report on tuberculosis was delivered in 1913 and considered practical approaches to managing the disease based on the British experience (Howard Tanner & Associates 1993: 3). Requirements to notify cases of tuberculosis were expanded from Sydney to the wider metropolitan and Hunter River Sanitary Districts in 1915. Patients were then assessed into one of three categories:

- (a) *Those who were well enough to live at home and attend anti-tuberculosis dispensaries for treatment.*
- (b) *Those sufficiently ill to require removal to a sanatorium; and,*
- (c) *Those for whom there is little hope of recovery and would require permanent care. (Howard Turner 1993: 4)*

The Board initially envisioned a system where patients with good chances of recovery would be transferred to sanatoriums, while Rookwood and Newington Asylums taking advanced cases. However public pressure from local residents prevented this and Waterfall would continue to receive advanced (c) cases well into the 1920s despite sustained arguments from the medical superintendent Henry Wilfred Palmer, that this practice seriously impacted other patient's ability to recover (Howard Tanner & Associates 1993: 9-10, Sydney Morning Herald 1928).

Notification to medical authorities of tuberculosis cases was secret and Patients could opt to remain at home. If a patient failed to recover and died, their premises would be disinfected by local authorities. Patients choosing to move to a sanatorium could either move to a private institution or request government assistance, which would mean transfer to Waterfall (Howard Tanner & Associates 1993: 4).

Although a variety of new treatment regimes were trialed at Waterfall by Palmer, including Koch's tuberculin and nascent iodine, these did not achieve success (Howard Tanner & Associates 1993: 8). The sanatorium regimes focused on diet, hygiene, exercise and rest, remained the only methods at the time that did produce some successful results.

2.1.4 The Tuberculosis Division of the Department of Public Health (1926 to 1940)

The Tuberculosis Division of the Department of Public Health was established in 1926 as governing body for the management of tuberculosis patients in NSW. The department was directed by a Board of Control comprised of the Director-General and representatives from public hospitals, non-government organisations and private sanatoriums (Howard Tanner & Associates 1993: 10). The Board directed a combined effort to address long standing issues of coordination. The following extract from Sydney Morning Herald article published on the 20 March 1928, outlines the problems faced by the Board and Waterfall in particular, as well as the solutions proposed to deal with the issues raised.

Waterfall Sanatorium is, according to the evidence of Drs. Palmer and Baret (Acting-Director of the Tuberculosis Division of the Department of Health), unable to cope scientifically with the disease that causes deaths among the 400 odd inmates at the rate of nearly two in every three days. The heavy mortality is due less to the virulence of the disease than to the lack of equipment; the "dumping" of hopeless cases from country hospitals, and to the mental effect of the indiscriminate mixing of incipient, early, and far-advanced cases. The sanatorium is without even an X-ray plant. This at least Dr. Arthur yesterday promised would be installed at the earliest possible moment. New buildings and accommodation have been asked for again and again by the administrative staff, yet the nurses themselves are without bedrooms. Ends of corridors have had to be utilised as makeshift dressing-rooms, while the nurses' beds are grouped on small verandahs.

Dr. Palmer informed Dr. Arthur that innumerable hopeless cases were sent from country hospitals to Waterfall. In many instances the patients are made despondent by being removed from friends and relatives, who could not possibly afford the time and money necessary to make frequent visits. Despondency, the doctors assert, had the positive effect of rapidly reducing the patients' vitality. But a still greater evil resulted from the "dumping" of incurable cases among men and women who had a reasonable hope of regaining their health.

Drs. Arthur, Palmer, and Baret, on being questioned by a representative of the 'Herald,' agreed that what was wanted to make Waterfall Sanatorium and similar institutions more effective in the treatment of tubercular patients was, briefly:—A scheme of co-ordination with other institutions which could accommodate consumptives; no advanced cases should be sent to Waterfall, general hospitals in every centre should be subsidised by the Government, in order that advanced cases may be kept reasonably near those who are dear to them; more facilities for vocational training; closer supervision of discharged patients; summer camps for ill-nourished children. (Sydney Morning Herald 1928)

During 1928, four anti-tuberculosis dispensaries were opened in NSW, regular nurse visit to at home patients were instigated and appropriate classification and separation of different classes of tuberculosis patients began to be enforced. By 1929 all advanced male cases were transferred to Randwick Hospital and beds were also opened for advanced female patients (Howard Tanner & Associates 1993: 11).

The Picton Lakes Village Tuberculosis Settlement was opened in 1929 and provided cottage accommodation for couples and families, with hostel accommodation also available for single patients (Howard Tanner & Associates 1993: 13). The Department developed a new classification system in 1930 and additional tuberculosis dispensaries were also opened in Parramatta/Liverpool area and Broken Hill in 1932.

Overall the rate of tuberculosis cases continued to decline from highs in the mid 1880s due to greatly improved sanitation and standards of living in Australia (Howard Tanner & Associates: 12-13). Treatments still continued along traditional sanatorium lines and the number of advanced cases still put pressure on the public system with a shortage of beds commonly being reported. However efforts for early detection were improved by the introduction of X-Rays and greater effort was made to detect the disease in its early stages with special clinics being established in Sydney and Manly hospital.

2.1.5 Introduction of Antibiotics (1940s)

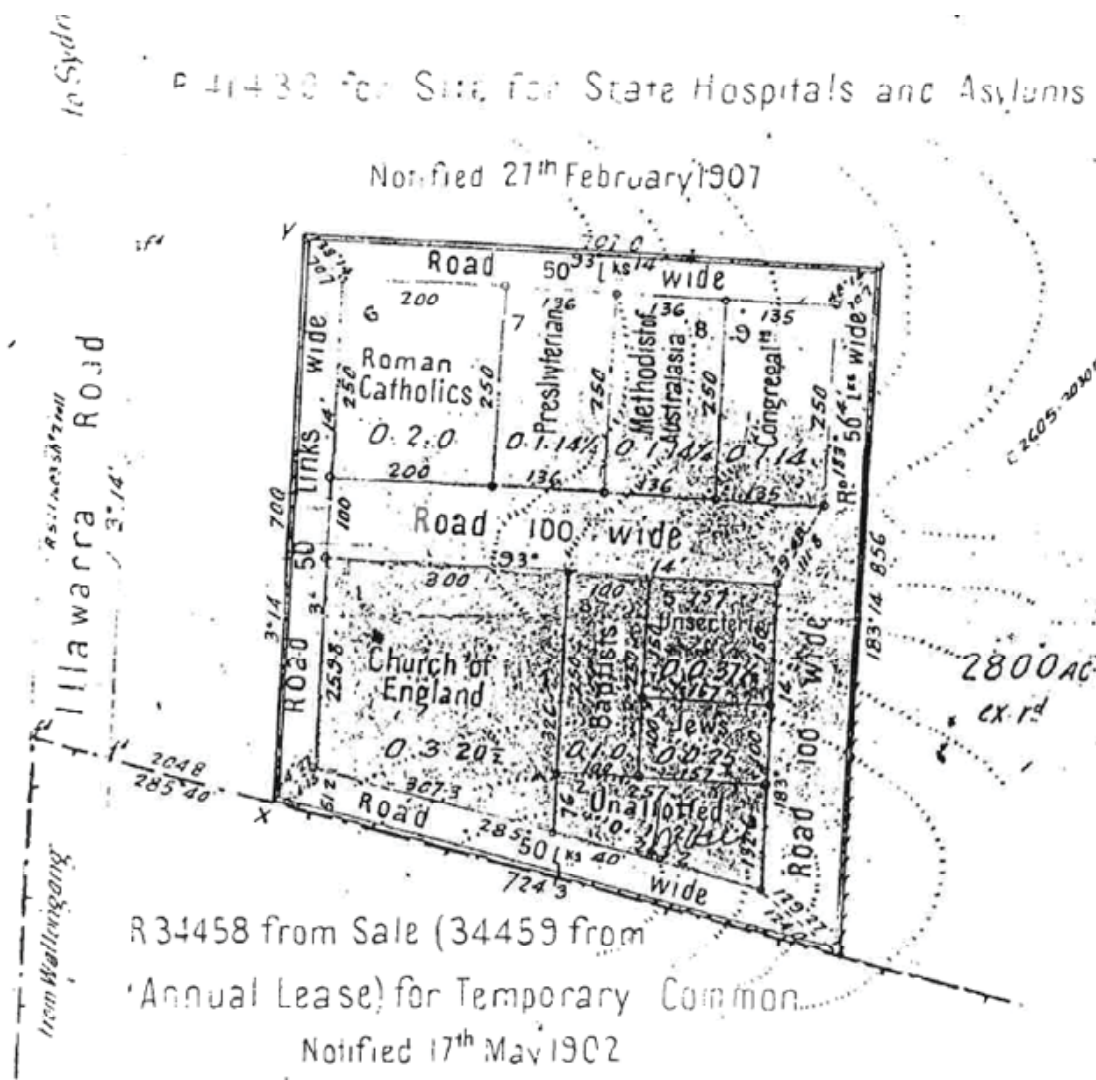
During the early 1940s research into antibiotics led to the development of therapeutic drugs that could effectively combat a range of communicable diseases. These drugs became available for public consumption and in combination with early detection facilities led to a rapid decline in tuberculosis hospitalization in Australia (Howard Tanner & Associates: 14). Coordination of tuberculosis management also entered a new phase, with the Federal Government taking a more active role on a national level. Under the Commonwealth Tuberculosis Act 1948, the Federal Government funded State detection and prevention schemes and provided additional therapeutic facilities (Howard Tanner & Associates: 14).

Tuberculosis cases had declined by such an extent by the mid 1950s, that the majority of public and private sanatoriums were no longer required and were remodeled for other health functions. The Waterfall Sanatorium was remodeled and reopened as an aged care facility in 1958, for which use it continues today (Howard Turner & Associates 1993: 14).

2.2 Waterfall General Cemetery 1909 to 1949

The primary documentation of the Cemetery available is the *Waterfall General Cemetery Register* (the Register), which records 2073 burials in five volumes dating from 18 May 1909 to 12 January 1918 (Vol 1); 12 January 1918 to 1 December 1923 (Vol 2); 11 December 1923 to 25 June 1929 (Vol 3); 18 July 1929 to 16 January 1939

A map of the Cemetery and layout of religious denominations was included in the public notification for the Waterfall Hospital published on the 6 March 1907 (Plate 1). After the opening of the Hospital in April 1909, the cemetery was soon in use with the first burial being for John Henry, on the 18 May 1909. The Register indicates that the Cemetery was most intensely used between 1908 and 1928, with a visible decline in use from 1929 to 1942 and then a dramatic decline from 1943 to 1949 (see Chart 1). The 1929 to 1942 decline is mostly likely linked to the establishment of Tuberculosis Division and the reorganization of patient care, with terminal patients being sent to other destinations such as Randwick Hospital. The dramatic decline of burials after 1943 is linked to the introduction of therapeutic drug treatments.



Not all tuberculosis patients who died at the Waterfall Sanatorium were subsequently buried in the Waterfall General Cemetery. Comparing Palmer's records of patient deaths (Rosen 1993: 4) and burials in the Register between the years of 1921 and 1930, only 31% to 52% of deceased sanatorium patients were buried in the Waterfall General in any given year (Chart 2). Obituaries of individuals who died at the Waterfall Sanatorium

are generally very brief and reference previous high point in careers such as for boxer Edward "Cocker" Tweedie (Sydney Morning Herald 1913a: 12) and the jockey T Parker (Sydney Morning Herald 1913b: 3) neither of who are buried in the Waterfall General Cemetery.

Of the 2073 burials recorded in the Register, 2065 have recorded locations in the cemetery, with remainder being listed as private funerals with no further details. Graves were numbered sequentially by Sections (rows) by religious denomination, although no mapping of this layout is provided. After 16 November 1909, grave numbering occurred on either an odd or even number sequence. The gaps between graves made by this sequencing appear to have been filled irregularly, particularly in the later years of the cemetery's operations.

The majority of individuals buried in the cemetery were Anglicans (48%), Roman Catholics (31%), Presbyterian (11%) and Methodists (4%) (Chart 3). Other faiths represented include Congregational Churches, Baptists, Lutherans, Wesleyan, Agnostics, Hebrews, 7th Day Adventists, Greek Orthodox, Jehovah Witness's, Greek Catholics, Buddhists, Confucius, Plymouth Brothers, Salvation Army, Mormons and Unitarians. There are six burials where the faith of the interred was unknown or unable to be deciphered from the register.

Beginning with the burial of Albert Pierce on 16 November 1909, full details in the Register were completed with W H Palmer as undertaker, James H Dye as Clergyman (although he is listed as a lay reader only) and HH Webb and Charles MacDermott as witnesses. Medical superintendent Henry Wilfred Palmer would supervise the Waterfall Hospital for thirty years (Smith 2013, NSW State Records 2013) and in this role would be the main undertaker for his patients until August 1911 and then infrequently after this until 1932. Other frequent names listed as undertakers include Charles MacDermott (1909-1924), Alfonso Douglas (1913 -1935), Robert Clyde Rowe (1924 – 1935), J B Coulter (1935 – 1940), J W Atkins (1939 – 1940), L J Fletcher (1936 – 1946), Herbert Gribbes (1939 -1942), Edgar Nicolson (1942 – 1949) and A L Corris (1944 – 1946). Charles MacDermott is cited as an assistant superintendent of George Street Asylum in 1905 and the Waterfall Hospital in 1909 (The Cumberland Argus and Fruit Growers Advocate 1905 and 1910). Robert Clyde Rowe is cited as superintendent of Waterfall Sanatorium in 1927 (Sydney Morning Herald 1927).

There are 29 private burials listed in the Register, with the most frequent private undertakers being Wood Coffill & Co. and John Smith. Wood Coffill & Co. was a funeral company who operating out of Sydney and suburbs (Sydney Morning Herald 1912). John Smith appeared to undertake some burials privately but was also listed as a witness at some funerals undertaken by Wood Coffill & Co. Wood Coffill & Co and John Smith account for 23 private funerals; one other private funeral lists a H Woods as undertaker and a further five burials are listed as private funerals but with no other details.

The small number of private funerals and the presence of medical staff on the Register in funeral roles, suggests that the vast majority of burials in the Cemetery were undertaken by the State. Fear of infectious disease was prevalent during the early 1900s and residents of Helensburgh protested at deaths from the Sanatorium being registered at the local Post Office as it involved placing papers from the Sanatorium on the local counter (Sydney Morning Herald 1910b). However the majority of deceased tuberculosis patients appear to have been transferred elsewhere for burial (Chart 2) most likely at the request of families and/or friends. Once buried, transfer of remains elsewhere appears to have happened only infrequently, with only one exhumation for reburial elsewhere being recorded in the Register.

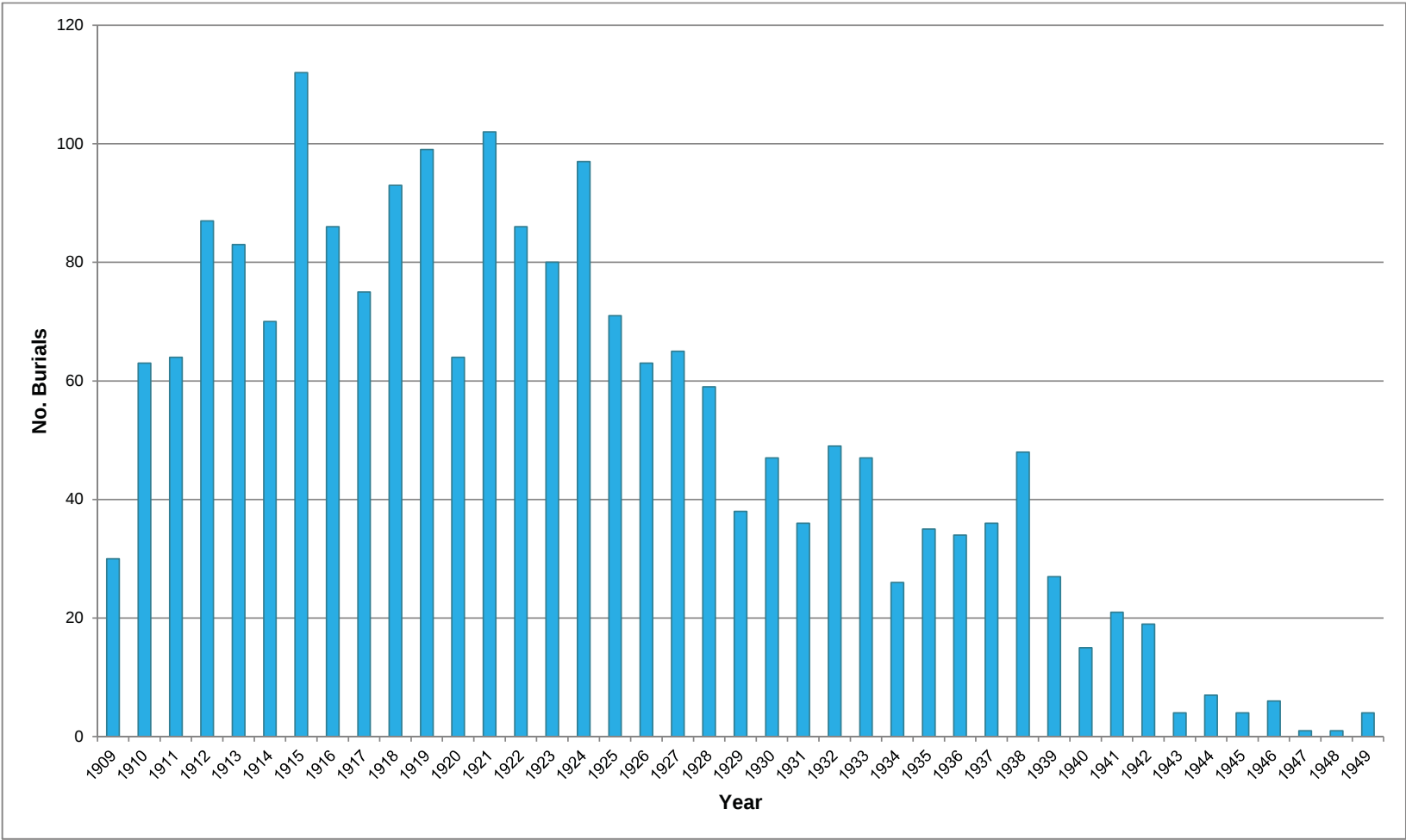


Chart 1: Number of Burials at Waterfall General Cemetery by Year

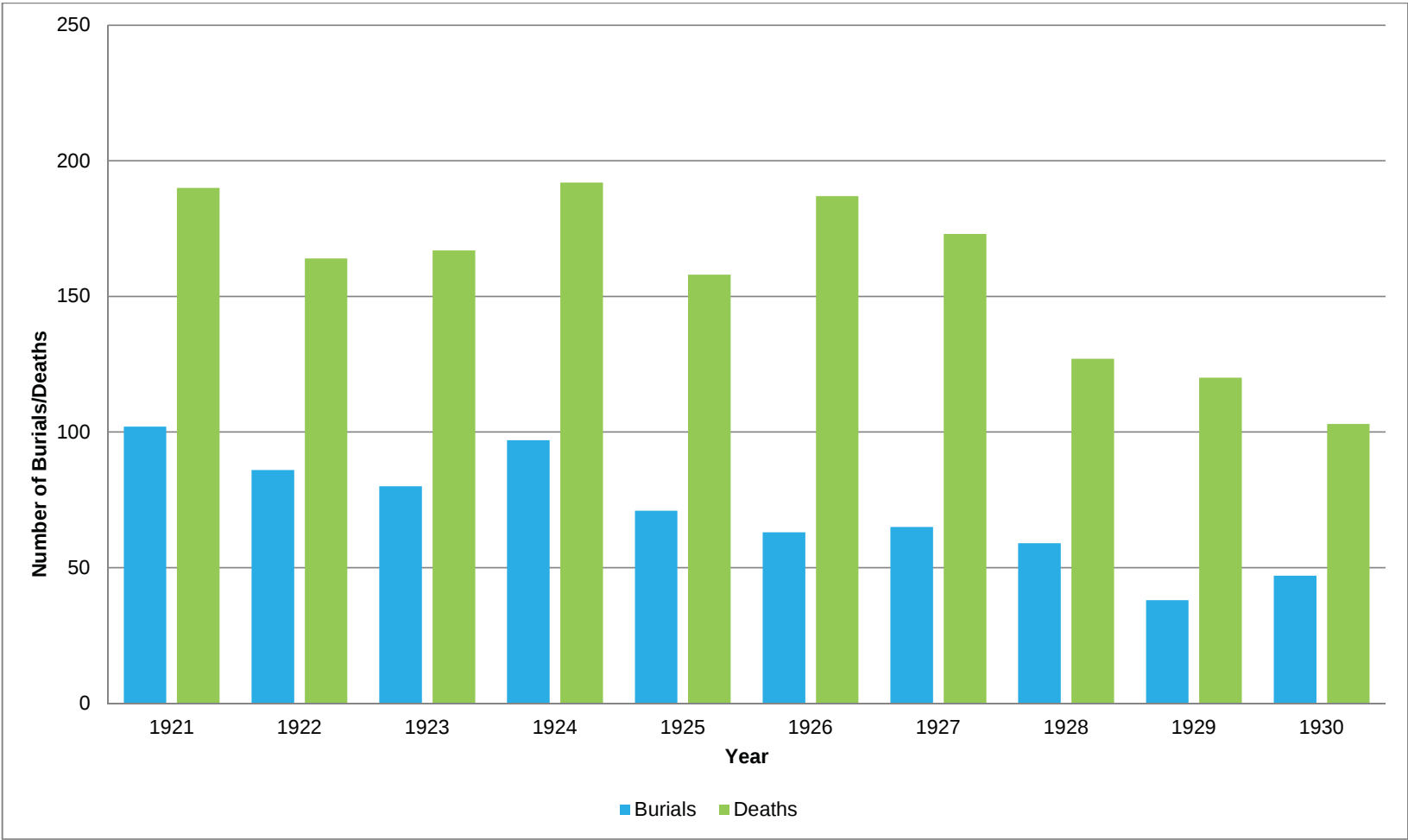


Chart 2: Comparison of Deaths at Waterfall State Sanatorium and Burials at Waterfall General Cemetery between 1921 and 1930

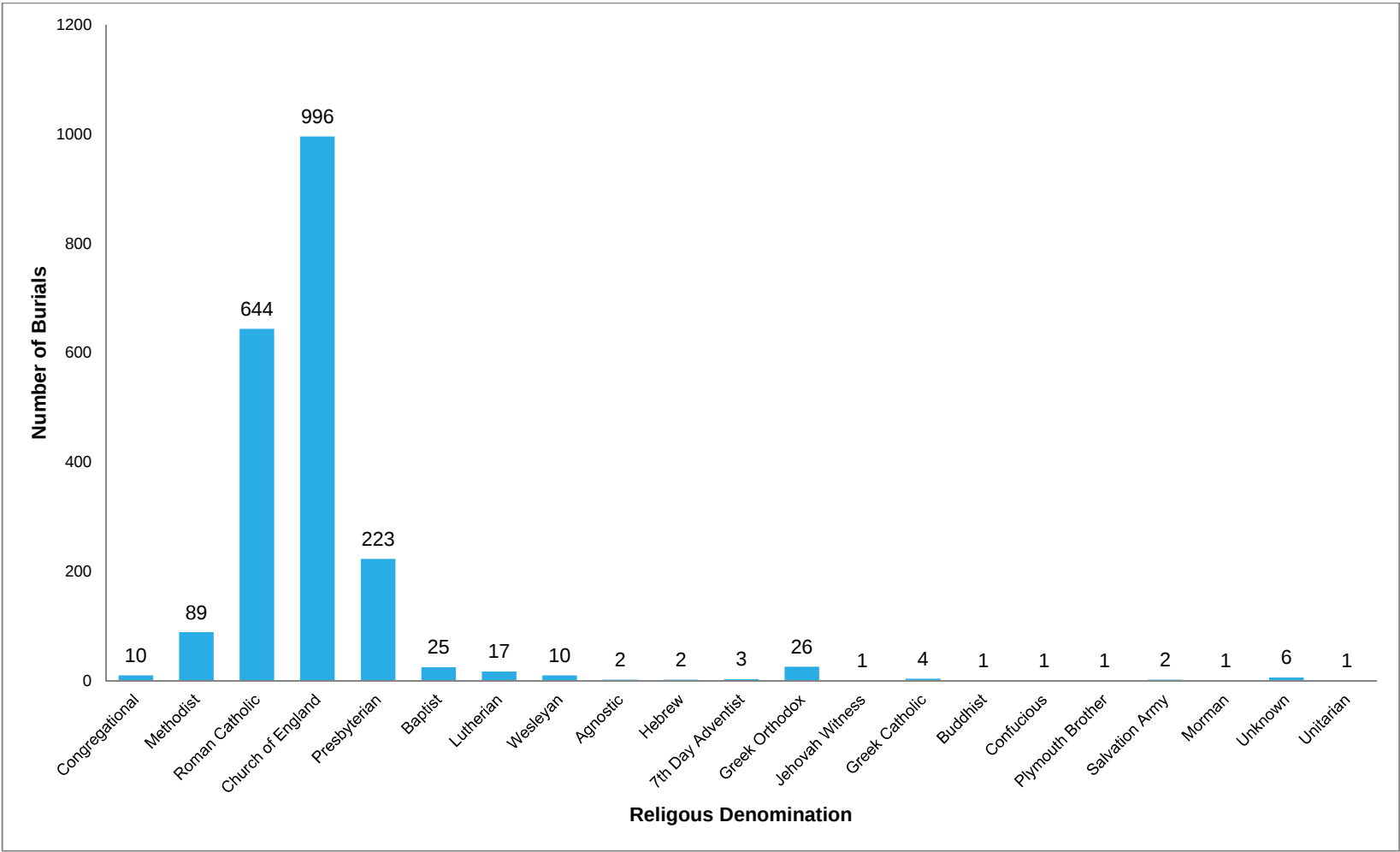


Chart 3: Number of Burials by Religious Denomination

2.3 Waterfall General Cemetery 1949 to Present

The last burial at Waterfall General Cemetery was recorded in the Register for Hugh Alexander Spence on the 11 November 1949. As a center for the treatment of tuberculosis the Waterfall State Sanatorium had a rapidly diminishing patient base as the disease was effectively combated. By 1956, the Waterfall State Sanatorium was no longer required in this role and was closed in 1957 (Rosen 1993: 6). After a local campaign the site was refurbished and reopened as the Garrawarra Hospital for aged care in 1958.

The reopening and change in role of the Hospital did not include the use of the Cemetery. While nominally the responsibility of the State until the introduction of the *Local Government (Control of Cemeteries) Amendment Act 1966*, it is likely that no maintenance was carried out at the Cemetery since 1957. The Cemetery was not included in the 1993 CMP for the Garrawarra Centre for Aged Care, although Howard Tanner & Associates recommended further study of the Cemetery be undertaken (Howard Tanner & Associates 1993: 51).

A study of the Cemetery was undertaken by John and Carol Herben, members of the Illawarra Historical Society, in 2000. This study did not have access to the Register and relied on information from church burial registers in Helensburgh and includes a list of 20 grave monuments observed by Mrs M E Bailey in 1981. The Herben's raised the matter of the maintenance of the Cemetery with WCC in 2000 but no action was undertaken at this time. The 2001 Black Christmas fires burned through the Cemetery but no management actions were subsequently undertaken (WCC 2012).

In 2011, care and control responsibilities for Waterfall General Cemetery were raised with WCC again by the Helensburgh Historical Society. WCC acknowledged it has care and control responsibilities for the Cemetery and commissioned the preparation of this CMP.

2.4 Dr Henry Wilfred Palmer (1877 – 1956)

While the Register documents a large number of people interred or involved with burial activities at the Cemetery, very little is known about these individuals. The notable exception is Dr Henry Wilfred Palmer, medical superintendent of the Waterfall State Sanatorium from 1908 until 1939. Our knowledge of Dr Palmer and his work comes predominately from his annual Sanatorium reports he produced while at Waterfall. A concise summary of Dr Palmer's career from the *Australian Dictionary of Biography* (Smith 2013) is provided below.

Henry Wilfred Palmer (1877-1956), tuberculosis sanatorium superintendent, and Charles Reginald Palmer (1882-1955), medical practitioner, were born on 26 May 1877 and 17 April 1882 at Burwood, Sydney, second and fourth sons of Edward Gillett Worcester Palmer, flour broker and later librarian, and his wife Emily Jane, née Smith, both born in Sydney. They attended Sydney Boys' High School; Henry left at 15, possibly because he experienced premonitory symptoms of pulmonary tuberculosis. He went to Hazelbrook in the Blue Mountains and worked for seven years on road contracting and the family orchard. When Charles enrolled in medicine at the University of Sydney, Henry joined him. They graduated M.B., Ch.M. together in 1906. After a stint at the Queen Victoria Homes for Consumptives at Wentworth Falls and Thirlmere, Henry joined the Public Service in June 1907 and was resident medical officer at the Coast (Prince Henry) Hospital until August 1908. In April 1909 he was appointed first medical superintendent of the Home for Consumptives, Waterfall, where he remained until 1939.

He was a thoughtful, reserved practitioner. He endlessly importuned government for money to improve the sanatorium, for mains electricity, finally supplied in 1925, for safer milk, for an efficient laundry. His ideal of a complete system of tuberculosis eradication and management, controlled by a divisional head within the Department of Public Health, was achieved only after his retirement. He wanted early, intermediate and

advanced cases placed in distinct institutions with appropriate régimes, allowances linked to the basic wage for hospitalized patients, and after-care for sufferers and their families when the patient was discharged and needing help in finding suitable employment. Palmer also called unavailingly for legally controlled milk sterilization to eliminate non-pulmonary forms of tuberculosis.

His dispirited annual reports on his sanatorium, and his survey of sanatoria in South Australia, Victoria and New Zealand, published in 1924, reveal an unflinching appreciation of the shortcomings in tuberculosis therapies and public interest. Palmer's bleak, courteous honesty upset colleagues concerned with the prestige of the profession. He wanted Waterfall to fulfill its declared purpose by admitting only 'early' cases with favourable prognoses who might, with rest, good nutrition, and training in managing their diet, coughing and spitting, be restored to their families and a job: but Waterfall, like other sanatoria, did not cure and was full of advanced chronic cases drifting towards death. 'Early' cases did not do much better: throughout Palmer's superintendency 90 per cent of patients discharged from New South Wales sanatoria lived less than five years. Palmer tried new therapies as they became fashionable, Dreyer's Antigen, muttonbird oil, saccharin, artificial pneumothorax among them, and duly reported the failure of each.

In 1939 he became secretary and chief executive officer of the Carrington Centennial Hospital for Convalescents, Camden, remaining there until 1955. Palmer's hobby was gardening and, like many sanatorium doctors, he was also interested in breeding pigs.

On 12 August 1908 Palmer had married Ethel May Wheeler, and, as a widower, on 3 February 1923 Magdalene Russell, a nurse. He died at Strathfield on 22 May 1956. His wife, and one son and two daughters of his first marriage survived him.

2.5 Summary of Historical Evidence

The Waterfall General Cemetery was in active operation servicing the Waterfall State Sanatorium from 1909 to 1949. The Register records at least 2065 graves in the cemetery with the majority of burials administered by Waterfall State Sanatorium staff and local clergy. The active role of the Waterfall State Sanatorium staff in burials reflects the role of the Sanatorium as a State institution dealing with an infectious disease, the isolation of the facility and most likely the isolation from support networks, reduced circumstances and/or destitution of the deceased.

Use of the cemetery is linked to the intensity of use of the Waterfall State Sanatorium and introduction of new methods to effectively treat tuberculosis. With the closure of the Waterfall State Sanatorium in 1957 the Cemetery was no longer required and maintenance likely ceased at this point. As such the Cemetery has undergone revegetation and been subject to at least one bushfire event without active management. A summary of important events for the Cemetery are provided below in Table 3.

Table 2: Timeline of Activities at the Study Site.

Date	Event
16 Jan 1907	Gazette for Waterfall Hospital for Consumptives.
27 Feb 1907	Waterfall General Cemetery layout notified in gazette.
11 Dec 1907	5.5 acres reserved for Cemetery.
14 April 1909	Waterfall Hospital for Consumptives opens.
18 May 1909	First recorded burial in Cemetery - John Henry.
May 1912	Female wing opened.
1915	The highest number of burials, 112, in one year during the operation of the Cemetery.
1926	The Tuberculosis Division of the Department of Public Health was established.
1929	Decline of burials to less than 50 per year.
1939	Dr Palmer leaves Waterfall State Sanatorium.
Early 1940s	Introduction of therapeutic drugs to treat tuberculosis.
1943	Decline of burials to less than 10 per year.
11 Nov 1949	Last recorded burial in Cemetery – Hugh Alexander Spence.
1957	Waterfall State Sanatorium closes.
1967	Care and control of the Cemetery transferred to local government.
2001	Black Christmas fires.

3 Site Description

An inspection of the Waterfall General Cemetery study site was undertaken on the 12 and 13 of February 2013. Details of the features and elements of the Cemetery are provided below and a layout of the Cemetery is shown in Figure 3.

3.1 Landscape Features

3.1.1 Fencing and Gates

Remnants of fencings and gates of the cemetery include the formal western entrance and remains of fence posts along the western boundary. The formal entrance is located 25 metres east of the Old Illawarra Road and 30 metres west of the Lot 4 DP840501 boundary. The entrance includes a gateway centered between two raised mounds either side of a gravel roadway forming a "V". The gateway fence consisted of wooden posts with a steel brace and decorative wire fencing (Plate 1). The northern mound is 13 metre long and runs from the northern side of the entrance gateway northwest towards Old Illawarra Road and was most likely planted with exotics including Radiata Pines, with only the burnt stumps of the pines remaining (Plate 1). The southern side of the entrance mound is currently obscured by dense vegetation.

The surviving posts on the western boundary indicate that the cemetery was potentially fenced off with a wire and wooden post fence. The surviving wooden posts on the boundary fence and entrance are all heavily burnt and charred (Plate 2).



Plate 2: Looking north at mound, post and fence at the western entrance to the Cemetery.

3.1.2 Paths and Drainage

There is one formal path in the Cemetery, the gravel road extending east from the western entrance across the site. This track is heavily obscured by vegetation growth and is predominantly visible only at the western entrance. No formal drainage was noted and the site is generally well drained due to its geographical location on a ridgeline. The Roman Catholic and Presbyterian are moister than other sections of the Cemetery and have denser vegetation growth as a result.

3.1.3 Landscape Plantings

The remains of tree stumps and fallen trunks provide evidence of Radiata Pine plantings and reseeded across the site. No Radiata Pines appear to have survived the 2001 Black Christmas fire and with the current

regrowth it is hard to distinguish planting patterns. It does appear that some pines may have marked boundaries between and around religious denomination areas and the gravel road, but clear rows are hard to distinguish (Plate 3). The majority of Radiata Pines have now collapsed except for the larger mature trunks which are dead but still standing.



Plate 3: Mature Silver Gum and Radiata Pine stump on the eastern Cemetery boundary.



Plate 4: Amaryllis plantings at Grave 214.

3.1.4 Grave Plantings

If they existed, very few grave plantings appear to have survived the 2001 Black Christmas fire. Naked lady Lilies (*Amaryllis Belladonna*) were identified growing on top of Grave 214, marked on each corner by a steel pole (Plate 4). These plantings are bulbs which flower annually and were just about to flower at the time of the site visit.

3.1.5 Native Vegetation

The original native vegetation of the Cemetery was most likely WMU 33 Silvertop Ash Ironstone Woodland (WCC 2012), with Silvertop Ash (*Eucalyptus sieberi*) being common across the site. Unlike the Radiata Pine, native vegetation has mostly survived the 2001 Black Christmas fire. The demise of the Radiata Pine has opened up significant canopy space that has allowed space invaders such as *Acacia obtusifolia* to dominate large sections of the cemetery (Plate 5). However other sections of the Cemetery are quite open woodland and grasses are relatively underdeveloped (Plate 6). Isolated patches of native grasses, *Microlaena stipoides*, were observed in some areas where light and space permitted.

The 2012 WCC flora and fauna survey observed *Eucalyptus racemosa* subsp. *racemosa*, *Corymbia gummifera*, *Hakea bakeriana*, *Hakea sericea*, *Hakea dactyloides*, *Banksia paludosa* subsp. *paludosa*, *Banksia serrata*, *Polyscias sambucifolia*, *Kunzea ambigua*, *Phyllota grandiflora*, *Pultenaea elliptica*, *Platyscae linearifolia*, *Leptospermum arachnoides*, *Oplismenus aemulus*, *Imperata cylindrica* var. *major*, *Eragrostis brownii*, *Entolasia stricta*, *Dichelachne crinita*, *Anisopogon avenaceus* and *Austroanthonia tenuior* (WCC 2012).



Plate 5: *Acacia obtusifolia* thicket in Roman Catholic section.



Plate 6: Silvertop Ash Ironstone Woodland around an ironstone grave in the southern portion of the Church of England section.

3.2 Grave Architecture

The inspection identified 221 graves in the Cemetery with 211 features ranging from wooden markers; ironstone borders; more formal monuments in concrete, sandstone or marble; and combinations of these features. The identified graves represent just over 10% of the known burials in the cemetery, with the vast majority of grave sites being most likely obscured by vegetation and organic buildup on the ground surface. The majority of surviving markers are in the Church of England section, followed by the Roman Catholic and Presbyterian/Methodist section (Table 4).

While the Roman Catholic and Church of England sections are relatively well defined along the 1907 gazetted boundaries, row A and B of the Presbyterian section appear to extend well into the Methodist section. The smaller Unsectarian, Jewish, Baptist, Unallotted and Congressional sections are also poorly defined and represented, despite graves being recorded in these sections in the Register.

Table 3: Number of Graves by Markers and Section.

Feature	Roman Catholic	Presbyterian / Methodist	Unsectarian	Church of England	Total
Concrete, sandstone or marble monuments	26	30	3	48	97
Ironstone border	23	13	0	43	79
Wooden marker	0	0	0	35	35
Exhumation	8	1	1	0	10
Total	57	44	4	126	221

3.2.1 Concrete, Sandstone and Marble Monuments

Concrete, sandstone and marble monuments are the most visible surviving grave architecture in the Cemetery as they are typically elevated above the leaf litter. The most common monument features are concrete or sandstone kerbing around a concrete infill slab covered with white marble chips (Plate 7). Surviving headstones are relatively uncommon with semicircular upright slabs or concrete desk with either a tablet, book or scroll plaque being the most represented surviving examples. The Roman Catholic section has examples of monuments with Calvary cross elements, such as stepped concrete or marble bases for a cross and an upright slab with a Calvary cross surmount (Plate 8).



Plate 7: An example of sandstone kerbing with a desk and marble plaque monument in the Church of England section.



Plate 8: An upright slab with a Calvary cross surmount in the Roman Catholic section.

Inscriptions on headstones or plaques are generally in lead lettering (Plate 8) or engraved into sandstone or marble surfaces (Plate 9), although some examples of metal plaques do survive (Plate 10). Many upright slabs and desks have pegs for plaques that have since been removed and it is possible that some of these were metal and have subsequently melted during the 2001 fire. Stonemasons are identified on only three graves and include the Andrew Bros Sydney (Georges Alexandre Dorion 1917 and Ephraim John... N.D.) and Austin & Dyer Sutherland (Margaret Poland 1927). Other stonemason marks may be present but are currently obscured.

While graves with kerbing were readily identifiable, slab styles were less so, with only one slab being identified without a headstone (Plate 11). This slab was heavily obscured by leaf litter and it is possible that more are present in the Cemetery but currently not visible. There are two slab and desk style graves with bronze plaques for naval stoker P. J. V. Hanlon (Plate 12). These graves are maintained by the Office of Australian War Graves (OAWG) and in good condition. The duplication most likely being a result of difficulty in determining the layout of the Roman Catholic section which is densely vegetated.



Plate 9: Engraved sandstone upright cross surmount slab in Church of England section.



Plate 10: Bronze plaque on a rectangular concrete upright slab in the Presbyterian section.



Plate 11: Concrete slab in Church of England section.



Plate 12: One of the graves for P. J. V. Hanlon in the Roman Catholic section.

The majority of surviving monuments have been impacted by tree fall and fire. The most common impacts across all sections of the Cemetery are from treefall, with many slabs and headstones broken or cracked as a result (Plate 13). Fire damage has marked some surfaces and also melted lead lettering, most commonly in the Roman Catholic section (Plates 8 and 14). Of all the sections, the Church of England section appears to have suffered the least impacts as it is less damp and there is less vegetation growth, which possible reduced

the heat of the 2001 fire. The Roman Catholic and Presbyterian/Methodist sections are quite damp with more vegetation growth leading to denser shrub and moss/lichen growth on grave architecture.



Plate 13: Snapped upright semicircular slab in Church of England section.



Plate 14: Marble plaque with melted lettering in the Roman Catholic section.

3.2.2 Ironstone Graves

While not as visible as graves with sandstone, concrete or marble architecture, graves with either a rectangle or oval kerb of ironstone cobbles are likely to be the most common monument type in the Cemetery. As with other low lying monument types, they are more likely to be obscured by vegetation growth and leaf litter, particularly in the wetter sections (Plate 15). Some Ironstone kerbs also include headstones, such as the example shown in Plate 16. There are likely to be many more of these graves present in the Cemetery, but are currently obscured.



Plate 15: Snapped upright semicircular slab in Roman Catholic England section.



Plate 16: Marble plaque with melted lettering in the section.

3.2.3 Wooden markers

The stumps of 35 wooden markers, most likely crosses, were identified in the Church of England section (Plate 17). Concrete bases in the Roman Catholic section suggest that wooden components were also used in other sections. The lack of identified wooden markers outside of the Church of England section is most likely due to the intensity of the 2001 fire being less in this section, rather than the absence of wooden markers in other sections.



Plate 17: Wooden marker stumps in the Church of England section.



Plate 18: Three step plinth with a socket for a cross in the Roman Catholic section

3.3 Car Wreck

There is a very decomposed car body in the Unitarian section of the Cemetery, most likely dumped along with rubbish in bush areas surrounding the Cemetery. Overall however the Cemetery is comparatively free of rubbish in comparison to the surrounding areas.

3.4 Summary of Site Description

The overgrown appearance of the cemetery has been variously described as "reclaimed by Mother Nature" (Herben 2001) and "forgotten in life and forgotten in death" by Mayor Bradbury (Sydney Morning Herald 2012), while Howard Tanner & Associates suggest that "Little remains to identify the Cemetery from the surrounding bushland" (1993: 55), however while many features of the Cemetery are obscured, many graves are still visible and identified during the survey. There is a distinct difference between the regenerating native vegetation within the Cemetery, which has a denser understory and younger native trees, and the mature native woodland vegetation outside its boundaries.

The dense vegetation in some areas of the Cemetery limits ground surface visibility and blocks views across the site as a whole. The current restrictions on visibility make it difficult to visualize the layout or extent of the

Cemetery without the aid of a map and GPS. Small clusters of monuments and isolated graves often only become visible in close proximity, this is particularly the case with graves consisting only of ironstone kerbs, which blend in with the natural surrounds very readily. Although monuments in some sections allow rows and layouts to be easily identified, the majority of the Cemetery layout only become identifiable through mapping and backtracking to check positions of monuments in relationship to one another.

While there are grave monuments in the cemetery, identifiable sandstone, concrete and marble monuments are present on a relatively small number of graves ($n=97$ or $<5\%$ of all graves in the Cemetery). While the number of ironstone curbing ($n=79$) and/or wooden markers ($n=35$) identified was similar to the number of sandstone, concrete and marble monuments, it would be expected with better ground surface visibility many more would have been identified. The simplicity of the ironstone and wooden markers and repetition of the style indicates a concerted institutional effort to ensure that graves were not unmarked, but these efforts were most likely limited to resources available locally. The effort to mark graves is particularly visible via wooden markers in the Church of England section where wooden remains have survived fires, but most likely extended to the Cemetery as a whole.

Surviving monuments tend to be relatively modest, with few elaborate designs, very simple or no ornamentation and no pillars or sculptures. There is also a general lack of plantings and landscape features which can be partially explained by the 2001 fire. The 2001 fire has dramatically altered the vegetation in particular, with no Radiate Pines surviving the fire and Acacia species proliferating in the newly open spaces as a result. The resulting vegetation is likely to provide habitat for the Eastern Pygmy-possum, Olive Whistler and frogs (WCC 2012).

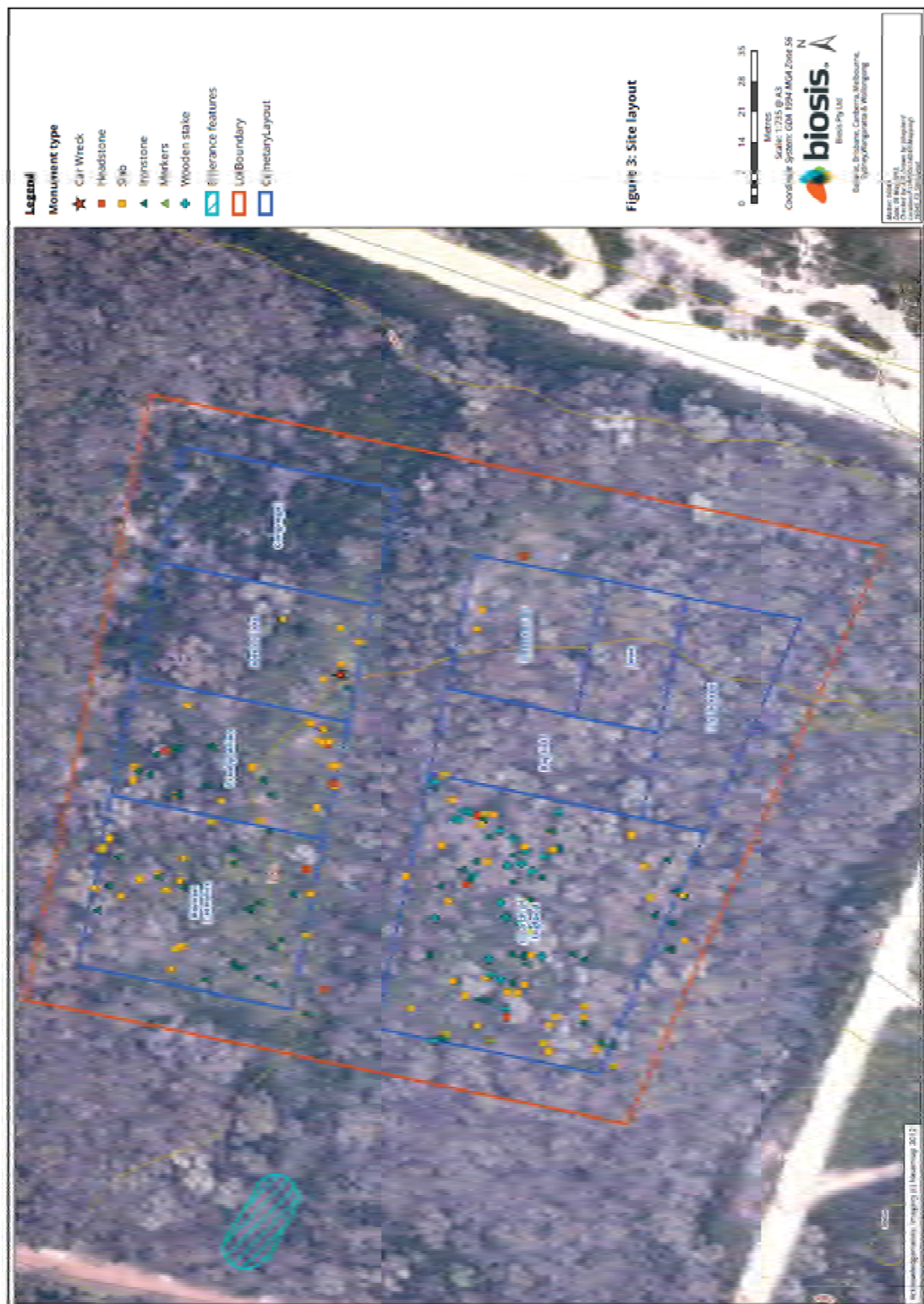


Figure 3: Site Layout

4 Cultural Significance

4.1 Basis of Assessment

An assessment of significance encompasses a range of heritage criteria and values. The heritage values of a site or place are broadly defined in the Burra Charter as the 'aesthetic, historic, scientific or social values for past, present or future generations' (Marquis-Kyle & Walker 1992, Australia ICOMOS 1999). This means a place can have different levels of heritage value and significance to different groups of people.

Cultural heritage is managed as a two-tiered system in NSW: items on the State Heritage Register and relics are managed through the *Heritage Act 1977*. All other items of identified heritage significance are managed through the *Environmental Planning and Assessment Act 1979* (EP&A Act) through local planning instruments. The Heritage Branch (in lieu of the Heritage Council) of the Office of Environment and Heritage administers the *Heritage Act*; local councils approve changes in accordance with their respective planning instruments.

Heritage assessment criteria in NSW are based on the significance values outlined in the Australia ICOMOS (International Council on Monuments and Sites) Burra Charter¹ and built upon by the NSW Heritage Council criteria A - E, which add the values of "rare" and "representative" to the discussion as criteria F and G. This approach to heritage has been adopted by cultural heritage managers and government agencies as the set of guidelines for best practice heritage management in Australia. The criteria and guidelines are presented in (Section 4.1.2).

The National Trust has also provided a specific set of heritage values that should be considered for the significance assessment of cemeteries in its *Guidelines for Cemetery Conservation* (2009). The ten heritage values presented by the National Trust are comparable with the NSW Heritage Council criteria and are designed to ensure that all elements of a cemetery are appropriately assessed. The National Trust heritage values and their relationship with the NSW heritage Council Criteria are presented in Section 4.1.2.

This assessment is intended to enable decisions on the future management of the place to be based on an understanding of its significance. It is important that future decisions do not jeopardise the cultural significance of the place. A Statement of Significance has been developed for the site as a whole.

4.1.1 Conservation Principles

The Burra Charter

Article 26.1 of the Burra Charter states that:

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

Once the place has been studied, the cultural significance can be assessed.

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

¹ *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance* (1999,) Australia ICOMOS Incorporated 2000.

4.1.2 Methodology for Assessing Significance

The evaluation criteria for the assessment of cultural significance were developed by the NSW Heritage Council in association with amendments to the *Heritage Act 1977*. The State Heritage Register (SHR) criteria were gazetted following amendments to the Heritage Act and have been in force since April 1999.

Assessments in this Conservation Management Plan were made using these criteria.

Criteria are outlined in the publication *Assessing Heritage Significance* – Heritage Office 2000. Under each criterion a place is assessed to be of STATE or LOCAL or NO heritage significance.

Table 4: Cultural Heritage Values

Cultural Heritage Values	NSW Heritage Council Criterion	National Trust Cemetery Heritage Values
HISTORIC	Criterion (a): An item is important in the course, or pattern, of NSW's cultural or natural history (or the cultural or natural history of the local area).	Historical Setting
	Criterion (b): An item has strong or special association with the life or works of a person or group of persons, of importance in NSW's cultural or natural history (or the cultural or natural history of the local area).	Historical Genealogical
AESTHETIC	Criterion (c): An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (or the local area).	Artistic, Creative & Technical Setting Landscape Design
SOCIAL	Criterion (d): An item has strong or special association with a particular community or cultural group in NSW (or the local area).for social, cultural or spiritual reasons.	Social Religious Botanical Ecological Human Remains
SCIENTIFIC	Criterion (e): An item has the potential to yield information that will contribute to an understanding of NSW's cultural or natural history (or the cultural or natural history of the local area).	Historical Religious Genealogical Artistic, Creative & Technical Botanical Ecological Human Remains
RARE	Criterion (f): An item possesses uncommon, rare or endangered aspects of the area's cultural or natural history (or the cultural or natural history of the local area).	Genealogical Artistic, Creative & Technical Landscape Design Botanical Ecological
REPRESENTATIVE	Criterion (g): An item is important in demonstrating the principal characteristics of a class of NSW's cultural or natural places, or cultural or natural environments. (or a class of the local area's cultural or natural places, or cultural or natural environments.)	Artistic, Creative & Technical Setting Landscape Design

4.1.3 Grading of Significance

A five-tier system has been adopted to clarify the significance of elements within the site and is based upon the grading listed in “Assessing Heritage Significance” (NSW Heritage Office 2001, Table 5). In this context, an element is a specific heritage item that contributes to the overall heritage significance of the site. The recommended treatment for each level of significance is explained in the General Conservation Policies. The term interpretation or interpretability is used in the sense of the ability to explain the meaning of the place/item, so as the significance of the place understood.

Table 5: Grading of Significance

NSW HO Grading	Justification	Status
EXCEPTIONAL	Rare or outstanding element directly contributing to an item's local or State listing.	Fulfills criteria for local and State significance.
HIGH	High degree of original fabric. Demonstrates a key element of the item's significance. Alterations do not detract from significance.	Fulfills criteria for local or State listing.
MODERATE	Altered or modified elements. Elements with little heritage value, but which contribute to the overall significance of the item.	Fulfills criteria for local or State listing.
LITTLE	Alterations detract from significance. Difficult to interpret.	Does not fulfill criteria for local or State listing.
INTRUSIVE	Damaging to the item's heritage significance.	Does not fulfill criteria for local or State listing.

Table 6: Implications of Assessment

Grading	Numerical Scale	Implication
EXCEPTIONAL	5	Elements to be conserved in terms of the <i>Burra Charter</i> .
HIGH	4	Elements to be conserved in terms of the <i>Burra Charter</i> , but conservation is to be balanced by an assessment of the practical consequences for the continued conservation and use of the item.
MODERATE	3	Acceptable options include retention, recycling and replacement by new construction in a way that has minimal adverse effect on, and enhances the significance of <i>Exceptional</i> and <i>High</i> elements.
LITTLE	2	Acceptable options include removal, modification replacement by new construction in order that the significance of related <i>Exceptional</i> , <i>High</i> or <i>Moderate</i> elements are enhanced.
INTRUSIVE	1	The preferred option is for the removal of the element or its modification in such a way so that its adverse impact is eliminated

4.2 Significance Assessment

4.2.1 Results of Significance Assessment of Site Elements/Precincts

Significance grading for each element or Precinct is presented in Table 7 and an overall statement of significance is provided in Section 4.2.4. The significance assessment has used the GML 2004 significance assessment as a baseline with some modifications to represent changes to the study site since 2004.

Table 7: Schedule of Element Significance for the Site

Site Element	Applicable Heritage Values		Significance Assessment	Significance Grading
	NSW Heritage Assessment Criteria	National Trust Cemetery Heritage Values		
Access Road, Fencing and Western Entrance	(a) Historic (c) Aesthetic	Artistic, Creative and Technical Setting	The access road, fencing and western entrance are surviving landscape decorative elements defining a formal entrance and boundary to the Cemetery. Although in poor condition, these elements are important in aiding the interpretation of the layout of the Cemetery and the original setting during its operational period (1908 to 1949).	Moderate
Radiata Pine Remains	(a) Historic (c) Aesthetic	Botanical Setting	While there is no living Radiata Pines remaining in the Cemetery, the surviving mature trunks and stumps from original plantings aid in the interpretation of the layout of the Cemetery and the original setting during its operational period (1908 to 1949).	Moderate
			Fallen smaller Radiata Pine trunks and stumps are from secondary seeding's of the original plantings. These remains are indicative of the lack of a maintenance regime (most likely in the late 1950s) and are a dramatic indication of the 2001 fire event. While contributing to current setting these remains are largely intrusive and hinder interpretation of the Cemetery.	Intrusive
Grave Plantings	(a) Historic (c) Aesthetic	Botanical Setting	There is one identified grave planting of <i>Amaryllis Belladonna</i> in the Church of England section. While individually of low heritage value, plantings aid in interpreting the original setting of the Cemetery during its operational period (1908 to 1949) and contributes to the current setting.	Moderate

Site Element	Applicable Heritage Values		Significance Assessment	Significance Grading
	NSW Heritage Assessment Criteria	National Trust Cemetery Heritage Values		
Silvertop Ash Ironstone Woodland	(c) Historic (d) Aesthetic	Botanical Ecological	A regenerating Silvertop Ash Ironstone Woodland vegetation community covers the extent of the Cemetery. The visual interaction of the Woodland with surviving grave monuments contributes significantly to the current visual setting of the Cemetery. This visual interaction is a key element in demonstrating the isolation of the Cemetery and lack of a maintenance regime since the cemetery ceased active operations. From an ecological viewpoint the Woodland demonstrates the process of natural vegetation regeneration over time and differences between introduced and native flora responses to major fire events. The Woodland also provides potential habitat to local fauna.	High
Graves	(a) Historic (b) Historic Associations (c) Aesthetic (d) Social (e) Scientific	Historical Social Religious Genealogical Artistic, Creative and Technical Setting Human Remains	The graves in the Waterfall General Cemetery are strongly associated with State efforts to manage tuberculosis in the 20 th Century, the Waterfall State Sanatorium for Tuberculosis and key staff at the Sanatorium, such as Dr Palmer. Surviving grave architecture demonstrates State processes for handling deceased tuberculosis patients in an isolated setting. Grave architecture also demonstrate artistic and creative elements; religious and social associations. The visual interaction of the Woodland with surviving grave monuments contributes significantly to the current visual setting of the Cemetery. The graves are of social significance to the descendants of the deceased and are likely to be important for future genealogical research by these groups. The graves and human remains have potential to inform future research of tuberculosis in Australia in the early 20 th century.	Exceptional
Car Wreck	None	None	A car wreck dumped after the Cemetery ceased operations. The wreck is an intrusive element that does not aid interpretation of the site and detracts from the Cemetery setting.	Intrusive

4.2.2 Comparative assessment

A comparative analysis is undertaken with similar heritage sites and/or places in order to help establish and validate the significance and values of a heritage item or feature. Sites used for the comparative assessment include:

- The Liverpool General Cemetery;
- North Head Quarantine Station & Reserve;
- Randwick Destitute Children's Asylum Cemetery; and,
- Garrawarra Centre for Aged Care.

Liverpool General Cemetery has been selected as an example of a general cemetery; North Head Quarantine Station & Reserve and Randwick Destitute Children's Asylum Cemetery are examples of cemeteries attached to institutions; and Garrawarra Centre for Aged Care has been included for its associated values with the Waterfall General Cemetery. Summaries of the cultural heritage significance assessments for these sites have been provided in Tables 8, 9, 10 and 11.

Liverpool General Cemetery is an active cemetery that has serviced the Liverpool community from the 20th Century through to the present day. The cemetery has strong social and aesthetic significance to the local community particularly in regards to members of influential families buried in the cemetery and the well maintained range of 20th Century monument styles. The social values of Liverpool General Cemetery are rooted in a discrete geographical community over a long time period, which differs significantly from the Waterfall General Cemetery, which did service a discrete social group, tuberculosis sufferers, who were not associated with a discrete geographical population or community.

The North Head Quarantine Station & Reserve and Randwick Destitute Children's Asylum Cemetery represent cemeteries servicing institutions with similar transitory social groups. In both these cases, the history of the institutions, the interactions of institutions and inmates and wider social connections with both inmates and institutions are significant cultural values, with often emotive contexts. In comparison to Liverpool General Cemetery, these institutional cemeteries are often not well maintained, do not have sophisticated grave monuments and many graves are unmarked. In the case of the Randwick Destitute Children's Asylum Cemetery, buried bodies contained in the cemetery were the only physical remains of the cemetery. Without having a local community, the condition of the Waterfall General Cemetery is similar to other institutional cemeteries where dedicated maintenance has subsequently lapsed when the associated institution has ceased to function or changed use and become disassociated from its cemetery.

The physical connections between institutions and cemeteries are also often indirect. While the location of the first cemetery at the Quarantine Station was visible from the main housing area and sick patients, it was eventually recognised as having a detrimental effect psychologically on the recovery of sick patients. The second and third cemeteries were subsequently located further away from the Quarantine Station over time. The Waterfall General Cemetery is similarly distanced from the former Sanatorium site and the cemetery was not considered in the 1993 significance assessment of the Garrawarra Centre for Aged Care (former Waterfall Sanatorium site) due to its physical dislocation from the site and main cluster of buildings. As with the North Head Quarantine Station, it is likely that the physical dislocation between the Waterfall Sanatorium and Cemetery was planned intentionally in order to prevent the Cemetery being a psychological discouragement to recovering patients.

The Waterfall General Cemetery is not unique as an institutional cemetery in NSW and other cemeteries catering specifically for tuberculosis patients are likely to exist at other institutions such as the former Queen Victoria Homes for Consumptives. However the Waterfall General Cemetery serviced the largest and only state run institute for tuberculosis in NSW and the high numbers of tuberculosis patients at this facility

correspond with a high number, range and concentration of tuberculosis patients buried in the Cemetery, that is unlikely to be rivalled in NSW. As such, the Waterfall General Cemetery is a research resource that has the potential to significantly inform research on tuberculosis in NSW during its periods of operations. Further research would be required to investigate the potential of the cemetery as a research resource to forensic archaeologists and/or physical anthropologists.

Table 8: Liverpool General Cemetery, Liverpool, NSW

Recorder/s	Neustein & Associates (1992) and FORM Architects Aust Pty Ltd (2004)
Description	Liverpool Cemetery can be access from McLean Street or Moore Street. It occupies a large, flat site of approx. 2.5ha. The cemetery is crossed by a major serpentine driveway which crosses the area to link gates on the north and south boundaries. The cemetery is laid out in rigorously gridded denominational sections containing predominantly east/west facing grave rows although this orientation occasionally varies. Sections include Anglican, Catholic Baptist, Uniting and Presbyterian. The dominant monument type is the desk in various designs and materials throughout the 20th century. The cemetery also contains an area of modern above ground vaults in the Catholic section. In some sections small areas have been established for lawn burial (lacking substantial monumentation). A screen of <i>Melaleuca armillaris</i> has been planted along the McLean Street frontage. Very little landscape or grave planting survives in the cemetery. Earlier planting includes mature Cypress and Brush Box along the drive north of the Anglican section. More recent landscape planting of native species occurs along the drive near the Uniting Church section. The cemetery is generally characterised by low scale development owing to the dominance of the desk or slab and desk monument. Scattered single headstones in granite or sandstone and occasional crosses, usually in marble are also evident. Any larger scale monuments are particularly conspicuous with a major element in the Anglican section being the 4m high monument to the Ashcroft family. This is a black granite pedestal with draped urn surmount recording burials of members of the Ashcroft family of "Collingwood House" between 1913 and 1970. Liverpool General Cemetery is listed on the Liverpool LEP.
Criteria	Assessment
Criteria A (Historic Significance)	The site demonstrates the history of settlement in the Liverpool area throughout the 20th century.
Criteria B (Historic Association Significance)	The site is associated with various individuals buried within the cemetery including a number of prominent families in the early history of Liverpool.
Criteria C (Aesthetic Significance)	The site exhibits a range monument types that indicate a level of technical achievement and creativity in their design and construction. The cemetery is well-maintained and is held within high esteem by the local population.
Criterion D (Social Significance)	The site is still in use as a burial and commemorative facility for the local cross-denominational communities of Liverpool
Criterion E (Research Significance)	There is the potential to gain more information on the site from further architectural, archaeological and documentary research.
Criterion F (Rarity)	Not assessed
Criterion G (Representativeness)	The site is representative of larger 20th century general cemeteries.

Statement of Significance

Liverpool General Cemetery demonstrates the history of settlement in the Liverpool area throughout the 20th century and is associated with numerous local individuals and families buried there. The site exhibits a range of monument types that indicate a level of technical achievement and creativity in their design and construction. It is representative of a 20th century general cemetery. The cemetery is well-maintained and is held within high esteem by the local population. It is still in use as a burial and commemorative facility. There is the potential to gain more information on the site from further architectural, archaeological and documentary research.

Table 9: North Head Quarantine Station & Reserve, Manly, NSW

Recorder/s	Peter Freeman Pty Ltd (2000)
Description	Three cemeteries functioned throughout the history of the Station. The approximate location of the First Cemetery [Site IIIA1, c.1837- 1853], is at the junction of the wharf and hospital roads, however no visible evidence remains, so it is not a landscape element except to those with knowledge of its existence. The unfortunate positioning of the First Cemetery, always in the view of the well and recovering, was soon recognised, and the subsequent cemeteries were moved out of the perceived landscape of those quarantined. The Second Cemetery [Site L1, 1853-1881], is located east of the 3rd Class precinct. Three headstones remain in situ [two obscured by vegetation], and the outline of another two graves visible. The cemetery is separated from the experiential landscape of the quarantined unless they chose to visit it. The Third Cemetery [Site VA1, 1881-1925], is within the School of Artillery, on Commonwealth property. Two hundred and forty one burials are registered, and the cemetery retains many headstones and markers, protected by a chain wire three-metre high person-proof fence. This cemetery is even more removed from the Quarantine Station landscape than the second cemetery was. The Second and Third cemeteries become obscured and prone to bushfire if native vegetation is not regularly slashed. Erosion of grave sites occurs if the cemeteries are heavily visited or if stabilising vegetation [especially grasses] is removed. There has been natural weathering and corrosion of sandstone headstones and wooden cross grave markers. Uncontrolled public access to these cemeteries [especially the Third] can result in vandalism or theft of remaining headstones and grave markers. Some headstones from the First and Second cemeteries are now located in the artefact store within Building A20. Further research is required to relocate obscured graves. The cemeteries are powerful reminders of the purpose of the Quarantine Station, its successes and failures and of its internees. They have historical, archaeological, genealogical and educational significance and special significance for descendants of those interred in them. An archaeological assessment of the North Head Quarantine Station cemeteries; and an archaeological inspection report of the Third Quarantine Station cemetery have been prepared by the NPWS. These documents provide specific policy recommendations related to the conservation and management of the cemeteries, which are accepted as recommendations of this Conservation Management Plan. North Head Quarantine Station & Reserve is listed on the Commonwealth Heritage List.
Criteria	Assessment
Criteria A (Historic Significance)	EUROPEAN/ASIAN HERITAGE The North Head Quarantine Station is the oldest and most intact of the quarantine stations in Australia. It was always the pre-eminent place of quarantine among the colonies, both because of its early beginnings, and because it led in many of the advances in quarantine practice. The Station's function remained unchanged from 1828 to 1984 and all buildings and developments illustrate the changing social and scientific demands of quarantine during that period. The station was also central to the development of the colony of NSW's responses to local epidemics of infectious diseases. The history of the Quarantine Station, which is well illustrated by its buildings, sites, landscapes and the functions that took place there, interconnects with a number of key themes in NSW's history. The demands of quarantine, and the spotlight this cast on health standards, forced improvements in the conditions experienced by immigrants travelling to NSW, through the nineteenth century in particular. The procedures established for the quarantine of inbound shipping set the foundation for responding to the

	various local smallpox, plague and influenza epidemics up until the 1920s. The Quarantine Station also provided a safe haven to which the ill could be removed and treated. On a broader scale, the Quarantine Station dramatically demonstrates, in its development of arrangements to separate and deal differently with different classes and races of people, the changes in the social attitudes of the colony and State. This separation based on social status was most clearly evidenced by the barrier fences erected between the various class 'compounds'. The final transfer of the Quarantine Station to the State reflected the now-common pattern whereby land formerly reserved for special purposes, and protected from the development pressures of the urban areas surrounding them, became valued for the cultural and natural values they possessed and were re-gazetted for conservation purposes when no longer needed for their special purposes. NATURAL HERITAGE Some of the earliest collections of marine specimens were made at Spring Cove and are now housed in the Australian Museum. These collections were made in the 1830s and therefore have significance in the natural history of Sydney Harbour. The Little Penguin population is the only remaining mainland population of this species in New South Wales. This is important to the natural history of this species. Continued survival of the Little Penguin is equally important to the future pattern of conservation management of endangered species. The successful management of other threatened species in the Quarantine Station is similarly important to the course of NSW's natural history. The effects on other biodiversity elements of the further decline or loss of these threatened species is unknown but could be significant to the natural history of the place. (NPWS 2000)
Criteria B (Historic Association Significance)	ABORIGINAL HERITAGE North Head is associated with the Aboriginal presence, ownership and use of the land prior to and after European settlement as a site where the Cammerigal Aboriginal clan first saw the European settlers. As part of the wider Manly area it is associated with named Aboriginal persons, such as Bungaree's wife Gooseberry, Bennelong and Wil-le-me-ring, who played a part in the early European settlement of Sydney. Due to an apparent misunderstanding, Governor Philip was speared by Wil-le-me-ring in a bay in or near the Quarantine area [possibly Spring Cove or Little Manly Cove]. EUROPEAN/ASIAN HERITAGE The Quarantine Station has played an important part in the lives of many Australians, with over 13,000 persons, including convicts and free migrants to NSW and many Sydney residents, being quarantined, of whom an estimated 572 have died and are buried there. The inscriptions at the site are an unusual testimony to those associations. The Station has also been closely associated with the administration of health by NSW and the Commonwealth, and a number of health administrators prominent in the development of NSW's public health policies and practices have had close and long associations with the Station. These included Deas Thomson, Capt. H.H. Browne, Dr Savage, Dr Allyne, Dr J.H.L. Cumpston, and Dr W.P. Norris. The Station also has association with the architects and designers and builders who created the Station; particularly the office of the NSW Colonial Architect [to 1908], and the Commonwealth Department of Works and Railways, particularly George Oakeshore of the Sydney office. There has been no comprehensive survey of the architects/ designers involved in the NHQS buildings and it is recommended that such survey be undertake. The Station played a pivotal role in the post-WWII period with the housing of illegal immigrants [as detainees] and refugees to Australia [prior to the 'boat people' phase]. The Station thus reflects the maritime arrival and 'processing' not only of quarantined immigrants, but also of illegal and refugee arrivals. The 'down-turn' in Station activity paralleled the post-WWII change to airborne migration. Finally, the Station was the setting for socio-political dramas such as the revolt of the returned [and quarantined] troops after WWI; and the confrontations between secular and religious authorities in NSW over access by religious entities to the Quarantine

	Station. (NPWS, 2000)
Criteria C (Aesthetic Significance)	EUROPEAN/ASIAN HERITAGE The Quarantine Station has a cultural landscape that is distinctly associated with its unusual functions. It was a landscape of rigid control, which is associated with and reinforced the institutional and functional nature of the place. The present day Harbour context is now recognised as being a visually attractive setting of natural bush and harbour views. The unity of the design and form of the buildings, set within grassy precincts, which convey a pleasant village-like feeling, unusual within the Sydney metropolitan area. The Quarantine Station bears witness to the evolution of public health policy in NSW and Australia generally, and the development of practices and procedures designed to protect the colony, state and nation from infectious disease. The quarantine system, which reached its full form in the first decades of this century, was a significant technical achievement, and was in part developed at the North Head Quarantine Station where it is well demonstrated in the surviving fabric. Aspects of this technical achievement can be seen in the remnant quarantine technology at the Station eg. The fumigation chamber, shower blocks and auto claves. NATURAL HERITAGE The aesthetic characteristics derived from the natural values of heath vegetation and sandstone cliff geomorphology within the Quarantine Station are an integral part of the outstanding aesthetic values of North Head conserved as part of the Sydney Harbour National Park. These values are derived from the expanse of uninterrupted cliff face and vegetated headlands. They are appreciated and enjoyed both from offshore and within Port Jackson. Together with those of South Head, they have enormous emotional impact on people arriving and leaving Sydney by sea. This impact is greater because the sheer cliff faces are capped with continuous low heath vegetation rather than tall forest or prominent buildings. Spectacular views of the drowned valley system of North and Middle Harbours are seen from within the Quarantine Station. (NPWS, 2000)
Criterion D (Social Significance)	ABORIGINAL HERITAGE Aboriginal heritage values at North Head, including the Quarantine Station area, are important to the Aboriginal community in general, and to the local community especially for a wide range of reasons, social, cultural and spiritual. Aboriginal presence in the area is older than Sydney Harbour [as we know it today]. Port Jackson and Sydney Harbour have been the scene of some of the earliest fateful interactions between Aborigines and the British invaders. The surviving North Head Aboriginal sites are seen as symbolising Aboriginal history of recent centuries as well as earlier times. The area is one of the last within Sydney Harbour environment where Aboriginal heritage values have been retained in a physical setting that is substantially intact along with Dobroyd, Middle, Georges, Bradleys, South and Balls Heads; Mount Treffe at Nielsen Park; and the Hermitage Reserve. This environment allows the Aboriginal community to educate the younger and future generations as well as others about Aboriginal history, life styles and values and provides a chance of experiencing some of the atmosphere and quality of traditional Aboriginal life. Aspects of these spiritual and heritage values are embedded in or embodied by physical remains such as rock inscriptions, paintings, images or deposits with archaeological material remaining as evidence of past Aboriginal presence, but these are seen as an inseparable part of the present natural setting. Evidence of Aboriginal occupation has been recorded in more that forty locations in the North Head area. EUROPEAN/ASIAN HERITAGE The Quarantine Station has strong associations for several groups in the community for social and cultural reasons. These associations include connections to the Aboriginal community, for whom the Quarantine Station is a component of the North Head/Manly area. This area has strong associations with previous Aboriginal ownership and use; with the impact of European settlement on the Aborigines; and through specific acts of Aboriginal resistance in the late 18th and early 19th centuries. North Head Quarantine Station also has associations with the former Quarantine Station staff, who worked on the

	station while it was an active quarantine; with former passengers subjected to quarantine, and their families [eg as exemplified by the Constitution memorial and family commemoration of their forebears' quarantine experience]; and with the Manly community, as part of the wider North Head landscape, which has significantly contributed to the 'sense of place' of that community. The station also has significance to Asian immigrants or seamen who arrived in Australia and were detained at the Station. Many of these internees made their permanent home in Australia. (NPWS, 2000)
Criterion E (Research Significance)	ABORIGINAL HERITAGE Aboriginal people have occupied the Sydney basin for at least 20 000 years. The Harbour has been a focus for Aboriginal habitation since its occupation over 6000 years ago. So much of the physical evidence of Aboriginal people's occupation of North Head is either undiscovered or lies outside the immediate North Head Quarantine Station Study Area. Many of the known sites have limited potential to yield new information due to the nature or state of physical preservation. However, given the limited capacity in this study for thorough archaeological assessment. It is possible that some sites or as yet undetected sites exist that might have greater potential to yield information that contributes to our understanding of Aboriginal occupation of the area. EUROPEAN/ASIAN HERITAGE The surviving fabric of the place, both through its elements, components and subsurface [above and below ground] archaeological evidence, have considerable research value at a State level, with the potential to provide information on the operation of the Quarantine Station and of those in quarantine, and so to add to our knowledge of its history. The station is significant for its ability to educate the general public in its history. NATURAL HERITAGE The area of North Head including the Quarantine Station is a remnant fragment containing once highly common vegetation types in the Sydney region. Many of these vegetation types and the wildlife they support are confined to disturbed remnants with the original vegetation having been cleared for urban and industrial development. Over 450 species of plants are found on North Head. Ninety species of native birds have been recorded in the Quarantine area including some species covered by international migratory bird agreements. The long period of 'isolation' of North Head as a 'tied island' initially allowed the species of flora and terrestrial fauna on the Head to evolve independently from those found elsewhere in the Sydney Basin. Although no longer tied, and now subject to the introduction of exotic flora and fauna, this early isolation has enhanced the value to science of the biodiversity on North Head. The response of plants and animals to periodic burning and periods without burning has potential to yield information important to the understanding of the natural history of the Hawkesbury Sandstone flora and fauna. (NPWS, 2000)
Criterion F (Rarity)	EUROPEAN/ASIAN HERITAGE The Quarantine Station, as NSW's primary quarantine facility for 166 years, held a unique place in the State's history, and its remarkably well preserved set of quarantine structures, landscape features and inscriptions make it a place of great rarity. The functions it fulfilled are no longer used to control quarantinable diseases, and the North Head Quarantine Station has the best representative collection of quarantine related buildings, equipment and human memorabilia [in the form of the inscriptions] of any Australian quarantine station. The moveable heritage associated with the Station; [and comprehensively documented by the NPWS] is of great cultural significance; particularly in situ within the Station. The Station is also significant in Australia's European and Asian history as being one of the few Australian sites taken into conservation ownership and management directly after its original function and use had been ended.

	NATURAL HERITAGE Three species, one subspecies and populations of two other species are listed in schedules of the Threatened Species Conservation Act 1995. These species are the Little Penguin, <i>Eudyptula minor</i> [Schedule 1, endangered population, Manly]; Long-nosed Bandicoot, <i>Perameles nasuta</i> [Schedule 1, endangered population North Head]; the Sunshine Wattle, <i>Acacia terminalis</i> ssp <i>terminalis</i> [Schedule 1, endangered]; Camfields Stringybark, <i>Eucalyptus camfieldii</i> [Schedule 2, vulnerable]; the Powerful Owl, <i>Ninox strenua</i> [Schedule 2, vulnerable]; and the Red-crowned Toadlet, <i>Pseudophryne australis</i> [Schedule 2, vulnerable]. In addition to the threatened plant species there are over 450 other species of vascular plants and ferns representing 109 plant families. This level of genetic diversity is scientifically interesting and aesthetically pleasing. The endangered population of Little Penguin is significant as the only population of this species which breeds on the mainland of NSW. The characteristics which have enabled this population to persist in one of the busiest commercial harbours in the world are interesting for scientific study. The endangered population of Long-nosed Bandicoot is also scientifically interesting as a remnant population of a species which was formerly common and widespread in the Sydney region. The few remaining trees of Camfields Stringybark are a significant component of the entire genetic resource of this vulnerable species. (NPWS, 2000)
Criterion G (Representativeness)	EUROPEAN/ASIAN HERITAGE The Quarantine Station has the best collection of features in Australia reflecting the practice of quarantine, once operating at a number of stations around the nation. NSW had the first, and the last, operational quarantine station at North Head, and the surviving evidence at the station demonstrates many of the key milestones in quarantine development in this country. The moveable heritage of Quarantine Station is considerable in size, and has cultural significance in its own right. (NPWS, 2000)

Statement of Significance

NORTH HEAD QUARANTINE STATION The Quarantine Station occupies the first site officially designated as a place of Quarantine for people entering Australia. It is the nation's oldest and most intact facility of its type and can thus be ascribed national significance. Together with Point Nepean Station, and in terms of the story of quarantine and its role in controlled migration to Australia, the two Stations have to be considered as being nationally significant quarantine sites. The Station's use remained essentially unchanged from 1828 to 1984, and all buildings and development on the site reflect the changing social and scientific demands of Quarantine during that period. The formation and development of the Quarantine Station relates directly to the growth of Australia as a remote island nation. It symbolises the distance travelled and perils faced by many immigrants who first stood on Australian soil at the Quarantine Station. The site has symbolic significance for these reasons. The history of the site reflects the changing social and racial values of the Australian community and the development of medical practices in controlling infectious diseases. The site has historic significance in demonstrating and elucidating major themes in Australian history, immigration, the development of society and government, social welfare and health care, treatment of disease, transport and conservation. Evidence of the hardships experienced by European and Asian internees during their detention in Quarantine and the tragic deaths of some of them, is powerfully conveyed by the inscriptions on the gravestones, monuments and amongst the random inscriptions scattered throughout the site. The rugged topography of the southern rock cliffs in the area of the Old Mans Hat, where the power of the sea is manifest, and where the healthy and sick internees sought relief from the confinement of the Quarantine Station, contrasts strongly with the sanctuary of Quarantine and Store Beaches, where European vessels were first quarantined and from where the food gathering and cultural activities of Aboriginal people were abruptly halted. The views to the Station [and North Head] from the city of Sydney; and from the Station down the length of Port Jackson are significant for their iconic value. The class system which permeated Colonial society in this country is illustrated clearly in the extant building fabric and in cultural landscape which contains the subtle evidence of the fences and paths which were contrived to maintain absolute separation between the classes and races, and between the healthy and the sick, the dying and the dead, at the Quarantine Station. The whole place displays evidence of natural systems, historic built forms and historical associations with the experience of quarantine have been retained largely intact due to its relative isolation on North Head.

Table 10: Randwick Destitute Children's Asylum Cemetery, Randwick, NSW

Recorder/s	Godden Mackay (1995))
Description	The former Randwick Destitute Children's Asylum Cemetery was a burial ground attached to the Asylum. The Asylum was a benevolent institution that operated between 1858 and 1916. The remains of around 175 children from the Asylum were contained in the Cemetery, which has since been destroyed.
Criteria	Assessment
Criteria A (Historic Significance)	It is no coincidence that the destitute Children's Asylum, initially established at Ormond House, Paddington and later at Randwick was established in 1852, one year after the discovery of gold. While reasons for the particular circumstance for each child inmate varies, a number were the victims of abandonment by at least one parent; gaoled, drunken or absconded to the goldfields. The establishment of the Asylum itself reflected directly an increasing concern amongst Australian society for social welfare. Private citizens, passionately believing in the benefits of education, moral therapy and self discipline, formed philanthropic societies that established benevolent institutions to supplement inadequate government initiatives. The period between the 1830s and 1860s saw a boom in the establishment of such organisations, particularly charitable societies and facilities for the care of children. Of these, one of the largest was the Randwick Destitute Children's Asylum which, at the height of its operations in the mid 1870s had more than 700 children. The 1860s saw a period of increasing government interest and intervention. The introduction of industrial school legislation afforded police the power to install children to be neglected or delinquent in reformatories. The most famous of these were nautical training ships including the Vernon and Sobraron in Sydney. Social commentator Stephan Garton, writing in <i>Out of Luck, Poor Australians and Social Welfare</i>, comments that: <i>"these patterns of work and discipline were common to all types of reformatoris, asylums and schools for children of the poorer classes. In the institution the children could be isolated from the corrupting influences of street life and trained to be self reliant workers and domestics. It was the enclosed environment which was the lynch pin of the moral reform movement. Institutions were designed to be factories for the production of good citizens and workers. This was a bold philanthropic vision and one that shaped the endeavors of those who hoped to stem the tide of idleness and poverty in the colonies"</i> However, from the 1860s, philanthropists and reformers began to question the effectiveness of such institutions and argued for greater government intervention. The social theory, which was well established by the turn of the century, was founded on the belief that such assistance was a universal right rather than a benevolent favour to be doled out selectively. In relation to children, the 1873 Public Charities Royal Commission, chaired by prominent lawyer and reformer William Charles Windeyer, was crucial in addressing the declining asylum standards and instrumental in the establishment of the NSW State Children's Relief Board in 1881. This Board was charged with implementing a boarding-out policy for children. One result was that by the middle of the second decade of the Twentieth Century the Randwick Destitute Children's Asylum was closed. The Asylum, therefore, is a remarkable exemplar, established at the height of the philanthropic movement and belief in large scale institutionalized children's welfare and, closing following the wide scale implementation of a government imposed children's relief scheme and boarding-out program. In addition, the Asylum has further historic significance through its connection with major historical figures such as Mr Justice Windeyer and his philanthropist wife, Mary Windeyer, the English sisters Florence and Rosamund ill, noted British child reformers and Joseph Coulter, the long standing asylum Superintendent (1886-1916).

Criteria B (Historic Association Significance)	
Criteria C (Aesthetic Significance)	As a 1995 landscape element, the site of the cemetery is unremarkable – a barren, sand swept piece of open space, identifiable primarily as the site of a row of early twentieth century utilitarian buildings, recently demolished. As a historic place it has limited visual qualities and appeal, but can be argued to have some non-visual aesthetics through the historic associations which provide a trigger to emotion. The Asylum and Cemetery also have inspirational value as they are the subject of a body of significant published work. However, overall it is difficult to sustain any substantive argument about major aesthetic qualities of the place.
Criterion D (Social Significance)	Largely as a result of the known, almost infamous, history of the Randwick Destitute Children's Asylum, the site of the Cemetery looms large as a place held in high esteem by particular sections of the community. The Cemetery has special association for the relatives of the deceased and the relatives, particularly descendants, of former Asylum Inmates. Similar values arise for some of those who continue to be associated with the Prince of Wales Hospital. Interest has been expressed by members of local Aboriginal communities concerned with the possibility that some of those buried may be of Aboriginal descent and with a wider social issue of appropriate treatment for buried remains. These concerns are not peculiar to Aboriginal people as many Australians hold death and cemeteries in special reference and regard them as sacrosanct. More technical interest and esteem is evident in the opinions voiced by those with particular research interest; historians, genealogists and physical anthropologists who, with varying degrees of emotion or objectivity, have espoused the potential value or important associations of the place. Wider community interest is reflected in the substantial media coverage that the site has already received through the efforts of the ESAHS Public Relations unit and its formal listing of the site as part of the Prince of Wales Hospital by the Randwick City Council (in the heritage schedule of the Randwick Local Environmental Plan – item 69), by the National Trust of Australia (NSW), and by the Australian Heritage Commission on the Register of the National Estate. The public meeting held on April 26th 1995 was also important in establishing and understanding the social value of the Cemetery. The meeting was the primary point at which those who care about the Cemetery strongly expressed the importance of the 'place' itself. Two other aspects of social value are apparent. Issues of child welfare and child abuse have received prominence over recent years as a contemporary social problem and it may well be the case that current levels of interest in the Randwick Destitute Children's Asylum Cemetery and the tragic circumstances of the children who died there, are born from a wider societal guilt or interest linked to current perceptions of child abuse as a major issue. The rights of the buried children, at least some of whom appear to have been mistreated during their lives, and a desire that they not be disturbed further, are other concerns expressed. Finally, and perhaps most importantly, the site has particular value and is esteemed as a 'Cemetery' – not the usual form of cemetery with accoutrements such as landscape design, monumentation, plantings and inscriptions or plaques, but rather, an extraordinary vacant site where, in a strange twist of fate, the burial is marked not by built elements but merely by the buried bodies of the deceased. The physical remains, therefore, are integral to the 'place'. If the remains are removed the Cemetery is gone and the

	place loses much of its primary historic association.
Criterion E (Research Significance)	The Randwick Destitute Children's Asylum Cemetery has extraordinary research potential and, if the human remains [present are regarded as available for research, unquestioned ability to yield information that can contribute to substantive questions about burial and skeletons of Australian children in the Nineteenth Century as well as more global research questions about children's skeletons. This is a matter that is discussed by Danse Dorion in detail in the 1993 Archaeological Assessment prepared by Anna Bickford and Associates. Dorion highlights the following research areas: • Race; • Sex; • Age. Growth and development; • Stature; • Disease; • Nutritional evidence an environmental stress; • Genetic relationships; and, • Burials – rates of decay and preservation. Dorion also argues that the anthropological collection is significant as it is representative of a range of variation within a sample, albeit a biased sample, and that, as a group of 'sub-adult' skeletons, the collection has particular values as a forensic reference set. The advice provided by Dorion has been discussed with Emeritus Professor Richard Wright, (physical anthropologist) and through him with experts at the Australian National University and the National history Museum in London. The research value of the site is confirmed by this consultation. Those consulted also provided specific advice on methodologies and comparable material (eg Speelfields, UK). While it might be arguable whether it is practical to analyse race or sex differences from the subject population, if individuals cannot be specifically identified, there is no doubt that the incidence of particular diseases or conditions and the condition of skeletal material can contribute to a wide range of research areas, particularly consideration of age/growth and development (eg dental age/limb bone examinations). Easteal from the Australian National University, suggest that if soft tissue samples (eg skin/hair), are available it would be possible (after an extended period of analysis), to establish Aboriginal descent as there are unique genetic markers in the HLA area of DNA. (this conclusion has a rather profound impact on options for consultative and statutory procedures to be followed. If it cannot be shown that there are not persons of Aboriginal descent buried, it is nevertheless desirable to treat the site as through such persons are present, given that subsequent long term analysis may well indicate that they are). In addition to the specifically technical physical anthropological and forensic examinations that would be possible, various aspects of human activity can also be examined including evidence of nineteenth century living, child welfare, material culture (if grave goods are present), and similar themes.
Criterion F (Rarity)	Investigations into similar sites throughout Australia suggest that the Randwick Destitute Children's Asylum Cemetery is extremely unusual, and could be argued to be unique. It appears to be the largest by far and one of the only four of exclusively children's cemeteries linked to an institution. The others are the Parkerville Children's Home Cemetery, the Tardurn Boystown Cemetery and the Bindoon Boystown Cemetery, all in Western Australia. The Parkerville site has only c. 25 burials of young children (aged less than three years). The other sites have 5 (Tardurn) and 3 (Bindoon) burials only. As an institutional children's cemetery the subject site is therefore in a class of its own. The research notes provided in Section 6.0 give a summary of investigations and discussions with institutions all around Australia and a general contextual overview of potentially similar sites. It would appear that there are only a handful of cemeteries in the country exclusively devoted to children. These

	are the subject site, the Pakerville, Tardum and Bindoon Cemeteries, the Pennyweight Flat Cemetery near Castlemaine in Victoria (which may have some adult burials) and the Moonta Children's Cemetery in South Australia. In addition, a number of large municipal cemeteries, such as the Gore Hill and Rookwood cemeteries in Sydney, do have sections devoted predominantly to children's burials. Investigation of cemeteries attached to institutions is a more complex matter. A number are known including, for example, the cemetery attached to Gladesville Hospital in Sydney
Criterion G (Representativeness)	On the one hand, the Randwick Destitute Children's Asylum Cemetery is rare. On the other hand, it also has a range of representative qualities. The physical evidence may typify the plight of nineteenth century children and the attributes of the nineteenth century welfare system and burial practices. As with many nineteenth century Australian cemeteries, the land was not consecrated or dedicated for burial. It could also be argued that a population of between 160 and 170 children, as a biased, but nevertheless sufficiently sizeable, sample to be representative of the lower social orders of the time.

Statement of Significance

The Randwick Destitute Children's Asylum Cemetery is an item of outstanding cultural significance.

The Cemetery, unlike most burial grounds in Australia, is marked not by monuments or even a developed landscape, but rather by the emotive association of its tragic history and sub surface physical evidence provided by the remains of the children buried there. The Cemetery consequently has a special sense of place and is held in high esteem by relatives of the deceased, local historians, Aboriginal people, others associated with the Asylum and the later prince of Wales Hospital and the general community.

The Cemetery has strong historic links with major development and changes regarding child welfare and the late nineteenth century practice of philanthropy. The Cemetery and the Asylum itself, typify attitudes towards welfare in general, and destitute children in particular, during this period. The operations of the Asylum and the experiences of the children who live there span a crucial period, encompassing moves from the establishment of such institutions by concerned citizens or governments to greater emphasis on wider community care and fostering.

The largest and one of only four known Children's Cemeteries in Australia that are associated exclusively with a welfare institution, the site is a rare research resource. The potential scientific data provided by the remains of this known population of deceased children, from a well documented background, provides a rare, if not unique, physical resource for forensic and other anthropological studies and analysis. As well as this purely scientific research, the individual graves may provide primary evidence about the lives, (and deaths), of the children that is separate from official reports and accounts – a unique chance for these children to reveal their own story.

Table 11: Garrawarra Centre for Aged Care, Waterfall, NSW

Recorder/s	Howard Tanner & Associates Pty Ltd (1993)
Description	Garrawarra Hospital occupies an elevated site, set in rocky heathland, with distant views to the Pacific Ocean and the City of Sydney. The site was presumably selected for its healthy, isolated location, and proximity to the small township of Waterfall on the South Coast railway line. The approach road is lined with substantial single-story Federation residences built for occupation by key staff members and their families. At the end of this row is a cross-axis, dominated by a grand gateway, dated 1911, with rusticated stone piers and iron gates and railings, and a subservient gatekeepers lodge, and opposite, a landscaped driveway leading to the Superintendent's Residence, set in landscaped grounds with a tennis court and orchard. The main driveway leads to the heart of a formally disposed plan, with the central administration kitchen and dining and boiler house blocks being flanked by the verandahed mens and womens wards. Above this group, on a natural prominence, is the Nurses Home with a related garden, while to the north east lie the remains of a series of 'chalets'; simple well-ventilated huts for cases requiring isolation.

The hospital at Garrawarra forms a collection of buildings which are physically, functionally and architecturally related, in a broad Arts and Crafts/Federation/Federation Free Style Blend. Their relationship is stressed through scale, form and materials which are all cleverly utilised and considered. An example of this is the subtle relationship of all the Superintendent's residence and adjacent garage, where the use of brick and stucco in the two story building is echoed in the single story garage.

The buildings have a unified architectural vocabulary, at once formal (in the sense of axial planning and composition) and informal (in the sense of whimsical pictorial detail such as bay windows, chimneys, gables).

While following essentially practical plans, the roof forms are allowed to dominate, a characteristic derived from the English Arts and Crafts movement, in particular the work of Voysey, Dawber, the young Lutyens. Other Sydney architects such as B.J Waterhouse and George Mcrae also practiced in this view.

The roofs were designed to be clad in terracotta tiles of Marsailles pattern, though some, even from the beginning, were sheeted in corrugated iron. Walls were of red (and sometimes cream) brickwork, often with upper portions varied by the use of roughcast or weatherboards. Occasional rusticated stonework was used to provide a strong base to an elevation. A variety of gables, skylights and chimney forms provided a visually interesting skyline. Windows and doors followed loosely interpreted Georgian patterns, occasionally grouped in bays, while verandahs and porte cochere were either architectural, with strong masonry arches, or followed a simple timber tradition.

The roads and buildings are placed in a manner linked to the topography of the site and allowing a north eastern outlook for many of the rooms. This had been deemed 'the best aspect' by medical planners who advised the NSW Government in the period around 1900.

Within rooms were pleasant and functional with an emphasis on cross ventilation and simple finishes, whether plain scrubbed boards on floors or painted plaster walls and ceilings. Early gas lighting was specifically vented, and superseded by electrical lighting at an early stage.

The original hospital buildings were designed at the end of Walter Liberty Vernon's career as an architect, (he died in 1914) and may be considered as the work of this architect in his prime. They favorably compare with his other works, which include individual buildings such as Post Offices and Court houses, and show Vernon's skill at handling a group of disparate building types and sizes of some complexity. These dissimilar structures are enriched and unified by consistent use of materials and an array of detailing which, although consistent varies in each building.

The buildings, although a hospital, are not institutional in character, and this is due to a combination of traditional materials and forms combined with comfortable proportions and a domestic scale. This also reinforces the observation of Vernon's skill as a designer. It also mirrors then current thought of an appropriate architectural expression for health and healing.

This is also evident in the site layout, which may be seen as a reflection of "garden Suburb" town planning theories, which emphasized open space, fresh air and space between buildings, as well as a movement away from "slum" conditions (which may have been from where many patients had come).

The later buildings generally demonstrate a diminished architectural skill and shift in attitude towards hospital architecture.

While Garrawarra Hospital is of special interest in terms of Edwardian period planning of tuberculosis sanatoriums, its primary architectural interest is in the clever disposition of the buildings along the contours of the site, and the visually rich pictorial language of the original structures, especially the Superintendent's House, the Nurses Home and linked Administration and Dining hall Complex.

The whole group of buildings and its setting provides a rewarding, consciously designed environment, enhanced by well established trees and plantations, and any new development should not alter the general external impression currently available to a visitor. Several important original interiors survive intact in Superintendents House and the Administration/Dining Hall complex and the Nurses Home and these should be retained.

Garrawarra Centre for Aged Care is listed on the Wollongong LEP.

Criteria	Assessment
Criteria A (Historic Significance)	-
Criteria B (Historic Association Significance)	The Garrawarra Centre for Aged care Waterfall, is a place of considerable significance because it was formerly the Waterfall Hospital for Consumptives established in 1907 and it was the first Government designed and controlled institution for the treatment of tuberculosis in New South Wales. The group of buildings erected on the site between 1906 and 1912 an comprising: Administration/Domestic Services/Activities Centre; Male Wards (Former); Female Wards 9Former); Nurses Home/Administration; Palmer House and Garages; and, Cottages 12 to 16. Have considerable significance as a series of buildings designed under the jurisdiction of Walter Liberty Vernon, Government Architect.
Criteria C (Aesthetic Significance)	The whole group of buildings and its setting at the Garrwarra Centre for Aged Care provides a consciously designed environment, enhanced by well established trees and plantations. Its primary architectural and aesthetic significance is in clever disposition of the buildings along the contours of the site and the visually rich pictorial language of the original structures. (1906-1912). The hospital at Waterfall forms a collection of buildings which are physically and architecturally related, in a broad Arts and Crafts/Federation/Federation Free Style Blend. The Site Layout is a reflection of "garden Suburb" town planning theories, which emphasized open space, fresh air and space between buildings.
Criterion D (Social Significance)	The group of buildings and site have considerable social significance as a large isolated community and demonstrate advanced hospital practice for the treatment of tuberculosis.
Criterion E (Research Significance)	-
Criterion F (Rarity)	-
Criterion G (Representativeness)	-

Statement of Significance

Garrawarra Centre of Aged Care is a place of considerable significance as the only government controlled institution constructed specifically for the treatment of tuberculosis in New South Wales. It is a landmark site which demonstrates fine site planning, building design and architectural detailing by Government Architect W. L. Vernon.

4.2.3 Assessment of Significance

NSW Heritage Assessment Criteria

The study site has been previously assessed using the NSW Heritage Council criteria (listed in Section 4.1.2) by GML in 2004. Despite some removal of fabric from the site, the major elements contributing to the heritage values of the site have been unaltered. However additional historical research has been undertaken since the 2004 assessment and the 2004 GML statement of significance has been altered as appropriate below.

Criteria A (Historic Significance)

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

The Waterfall General Cemetery actively serviced the Waterfall State Sanatorium for Tuberculosis between the years of 1909 and 1949. As part of its associations with the Waterfall State Sanatorium, the Cemetery provides unique documentation and physical evidence of the progress, or lack of progress, in treating tuberculosis in NSW in the early to mid 20th century. The Cemetery also demonstrates the burial processes and cooperation between a State institution and local religious organisations in an isolated context. Through servicing the largest and only State run institution for tuberculosis in NSW, the Cemetery is important in understanding these activities at a State level.

Guidelines for inclusion satisfied:

- Is associated with a significant activity or historical phase

The Waterfall General Cemetery satisfies this criterion at a State level.

Criteria B (Historic Association Significance)

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

The Waterfall General Cemetery has strong associations with the Waterfall State Sanatorium for Tuberculosis, its staff and tuberculosis patients buried in the cemetery itself. Of the individual staff and patients associated with the Cemetery, Dr Henry Wilfred Palmer is the most noted for his wider role as an activist for reform in tuberculosis treatment in NSW. Dr Palmer was medical superintendent of the Waterfall State Sanatorium from 1908 until 1939, and as part of this role was also the main undertaker at the Cemetery between 1909 and 1911. The participation of Dr Palmer with burials at the Cemetery helps demonstrate the extent of his role also as a State administrator for tuberculosis patients in care of the Sanatorium. The historic associations of the Cemetery are important in informing the life and works of Dr Palmer and the Waterfall State Sanatorium at a local level. In combination with the Waterfall State Sanatorium site, the cemetery is important in informing the wider effort of the NSW State to combat tuberculosis.

Guidelines for inclusion satisfied:

- Is associated with a significant event, person, or group of persons.

The Waterfall General Cemetery satisfies this criterion at a State level.

Criteria C (Aesthetic Significance)

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

The original layout and setting of the Cemetery has largely been lost as a result of fires and subsequent regrowth of Silvertop Ash Ironstone Woodland. The Woodland community covers the extent of the Cemetery and the visual interaction between the Woodland with surviving grave monuments contributes significantly to the current evocative visual setting of the Cemetery as 'lost' or 'reclaimed by nature'.

Guidelines for exclusion satisfied:

- Has lost its design or technical integrity.

Although the loss in integrity of the original design means that the thresholds for aesthetic significance are not satisfied under this criterion, the natural setting is important in establishing a sense of abandonment and the historical narrative of the Cemetery.

Criterion D (Social Significance)

An item has strong or special association with a particular community or cultural group in NSW (or the local area), for social, cultural or spiritual reasons.

The Waterfall General Cemetery is strongly associated with staff of the Waterfall State Sanatorium and tuberculosis patients buried in the cemetery. The graves themselves contribute significantly to a sense of purpose and scale of operations at the Sanatorium as well as demonstrating the social toll of tuberculosis during its period of operation. The social groups and individuals associated with the Cemetery were gathered from across the State and were grouped primarily by their interaction with the Sanatorium. As the Sanatorium no longer operations as a centre for the management of tuberculosis and tuberculosis as a disease has largely been cured in Australia, the social groups associated with the Cemetery largely no longer exist. However, the graves are of social significance to the descendants of the deceased and the social history of the Cemetery is still important to these and local historical groups, who given the range of deceased patients in the Cemetery are likely to be dispersed across NSW. The Cemetery is likely to be important for future genealogical and historical research by these groups.

Guidelines for inclusion satisfied:

- Is important for its associations with an identifiable group.

Waterfall General Cemetery satisfies this criterion at a State level.

Criterion E (Research Significance)

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

The Waterfall General Cemetery provides potentially the largest sample of tuberculosis patients from across the State in NSW and has the potential to significantly contribute to research in tuberculosis; institutional burial practices at the Cemetery; and individual lives of patients. The Cemetery is likely to also be of interest to individuals researching genealogy and the history of tuberculosis in NSW.

Guidelines for inclusion satisfied:

- Has the potential to yield new or further substantial scientific and/or archaeological information.

Waterfall General Cemetery has significant potential to contribute to NSW's history of tuberculosis and satisfies this criterion at a State level.

Criterion F (Rarity)

An item possesses uncommon, rare or endangered aspects of the area's cultural or natural history (or the cultural or natural history of the local area).

While the Waterfall General Cemetery is not unique as an institutional cemetery in NSW, it is a rare example of a cemetery dedicated solely to tuberculosis patients, likely being the largest such cemetery in NSW, and is unique as being the only such dedicated tuberculosis cemetery attached to a State institution.

Guidelines for inclusion satisfied:

- Is the only example of its type.

Waterfall General Cemetery satisfies this criterion at a State level.

Criterion G (Representativeness)

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

As a dedicated tuberculosis cemetery attached to a State institution, the Waterfall General Cemetery is most likely the largest cemetery of its type in NSW. The Waterfall General Cemetery is one of the best surviving and most representative examples of a large government institution cemetery from its time period and institutional context in NSW.

Guidelines for inclusion satisfied:

- Has the principle characteristics of an important class or group of items.
- Has attributes typical of a particular way of life, philosophy, custom, significant process, design, technique or activity.
- Is outstanding because of its setting, condition or size.

Waterfall General Cemetery satisfies this criterion at a State level..

4.2.4 Statement of Significance

The Waterfall General Cemetery actively serviced the Waterfall State Sanatorium for Tuberculosis between the years of 1909 and 1949. As part of its associations with the Waterfall State Sanatorium, the Cemetery provides unique documentation and physical evidence of the progress, or lack of progress, in treating tuberculosis in NSW in the early to mid 20th century. The Cemetery also demonstrates the burial processes and cooperation between a State institution and local religious organisations in an isolated context. Through servicing the largest and only State run institution for tuberculosis in NSW, the Cemetery is important in understanding these activities at a State level.

4.3 Curtilage

The curtilage includes the cemetery lot itself and areas of bordering bushland up to surrounding roads and firetails, in order to include the former entrance way and other former boundary markers. A map of the curtilage is provided in Figure 4.



Figure 4: Curtilage

5 Constraints and Opportunities

This Conservation Management Plan (CMP) has been prepared to guide planned future changes that may affect the Waterfall General Cemetery. The listing of the site on the Wollongong City Council's Local Environmental Plan (2009; 2010) as an item of Local heritage significance, including the associated LEP provisions, are likely to require specialist heritage consultant input for future changes on the site.

5.1 Statutory Obligations

5.1.1 Heritage Act 1977

The SHR, managed by the Heritage Branch (OEH), contains items that are of State Significance to New South Wales. Items that appear on the SHR have undergone a rigorous assessment process and are protected by the *Heritage Act 1977*. Changes made to State Heritage Register listed items can only be made with approval from the Heritage Council; demolition is not permitted except in certain circumstances.

No items in the study site are currently listed on the SHR.

Relics, that is, historical archaeological sites of local or State significance are also protected by the *Heritage Act 1977*. Disturbance to relics is not permitted except with an approved excavation permit or exception notification from the Heritage Council.

5.1.2 Local Planning Context

The Waterfall General Cemetery is listed on the Wollongong LEP 2009 as the Garrawarra Hospital cemetery as Item 61028.

5.2 Current Uses

The Cemetery is no longer actively used for burials and is in an unmaintained condition.

5.3 Proposed works

No future works are currently proposed for the site, however Council is considering options in regards to maintenance and access options for the site.

5.4 Potential Impacts

Management of cemeteries presents a number of challenges to appropriately managing cultural and natural heritage values, particularly in this case where the Cemetery has been unmaintained for approximately 45 years and substantial vegetation regrowth has occurred. The most important physical features of the Cemetery are the surviving grave monuments and if the Cemetery is left unmaintained these are likely to be impacted by:

- Uncontrolled fires;
- Continuing tree fall;
- Root lift; and

- Increased vegetation growth.

In addition, if the Cemetery is left unmaintained then the fall and trip hazards currently present across the site will present health and safety hazards. Without maintenance, these hazards would only be able to be controlled by physically barring access to the site, as current access restrictions do not prevent walkers and other visitors from entering the Cemetery. Physically barring access to the site would likely require the construction of some form of high fencing which would be considered intrusive to the cultural heritage values of the site.

Introducing a maintenance regime is only practical if it can be resourced into the long term, otherwise it is unlikely to achieve its desired impact. The costs to return the Cemetery to its 1949 condition are likely to be prohibitive and difficult to maintain. A low level maintenance regime to manage the current woodland setting is likely to be more manageable in the long term and one of the key attractions of the Cemetery to visitors is the current visual interaction of the Woodland with surviving grave monuments. Key areas that would need to be addressed by a maintenance program to promote conservation of the site include:

- Control fire patterns;
- Removal of trip and fall hazards;
- Removal of intrusive dumped elements such as the car wreck;
- Clear the main routes into the Cemetery to allow access and provide some visual interpretation of layout; and,
- Remove tree fall and root lift hazards from main clusters of surviving monuments.

It is likely that such a regime could be conducted in conjunction with community interest groups if appropriate consultation was undertaken.

While providing public access to the Cemetery is desirable it also presents a number of challenges. Firstly there is no direct legal vehicle access to the Cemetery, although it is accessible via catchment fire trails, and secondly it occurs in an isolated location. While direct vehicle access limits accessibility options to the Cemetery, particularly for the physically disabled, it also significantly reduces the potential for vandalism. However if vandalism does occur it is unlikely to be observed, which limits the ability to provide timely management responses.

Ideally, an option for public access would allow access to interested individuals and groups, without increasing vandalism risks and allowing for regular monitoring of the Cemetery condition. Options to appropriately manage public access may include installing physical barriers or putting in place administrative protocols for enabling public access, such as arranged tours. In all cases, consideration needs to be given how potential changes may physically impact the heritage values. As discussed, totally limiting public access is unlikely to succeed given the ability for bushwalkers to access the Cemetery via fire roads. Positive heritage outcomes are more likely to be achieved if such access is managed rather than totally restricted and some options for consideration are provided in Section 6.

5.5 Managing change

Where changes to the study site have the potential to impact on heritage items, a SoHI should be prepared. Using this CMP as a guiding document, SoHIs should be prepared in accordance with Heritage Council guidelines for SoHI (Appendix 1) and should only be as detailed as required by the proposed work. Acceptable change should be based on Table 12.

6 Conservation Policy

6.1 Introduction

6.1.1 Objective

The objectives of the policies in this plan are to achieve the conservation of the cultural heritage significance of the Waterfall General Cemetery. The statements of significance set out in Section 4.2.4 have been used as a principal basis for future management planning and work.

6.1.2 Basis of Approach

That Waterfall General Cemetery, Waterfall, New South Wales is regarded as being primarily significant for its historical role as a cemetery for tuberculosis patients from Waterfall State Sanatorium from 1909 to 1949 and the surviving fabric of the Cemetery demonstrates management of a cemetery in an isolated region. The challenge for heritage conservation at this site is to incorporate sound conservation policy with the requirements of ongoing maintenance in an isolated location. The underlying philosophy in the management of cultural heritage is based on the ICOMOS Burra Charter, which is to do as much as necessary and as little as possible. The approach to the development of the conservation policy is to retain and conserve the site elements of exceptional and high significance and develop policies to inform and guide management of the Cemetery.

6.1.3 Statutory Compliance

Historical relics and features within the study site are protected by the *Heritage Act 1977* and the Wollongong LEP 2009. A statement of heritage impact (SoHI) should be prepared elements of the site that are of moderate to exceptional significance, if an action is likely to impact the fabric or setting of the element. The document can use the history in this CMP and address the policies to ensure that change is managed to ensure that significance of the site is not compromised. The detail in the SoHI should be guided by the significance of the element and the level of change proposed. Proposals to introduce change should be made with the guidance of a qualified heritage practitioner to reduce delays in obtaining approvals.

6.2 Statement of Conservation Policy

The following policies are recommended for the conservation and future development.

The implications of each policy for individual site elements (individual monuments, plantings and fences) that contribute to the overall significance of the place are shown in **Table 12**.

6.2.1 Management Policies

Policy 1 – Adoption of this Conservation Management Plan

Wollongong City Council should adopt the CMP for the Waterfall General Cemetery site as the document guiding appropriate change to the significance of the site. The CMP sets out a strategy for managing the place to best maintain its cultural significance whilst ensuring high operational standards.

The management of the property, its future development, and ongoing maintenance, must be undertaken in a manner which permits the Conservation Policy to be implemented. It is important that the Conservation Policy is retained and understood by all those connected with the use, future development and maintenance

of the property. This includes the property owners and management, as well as any consultants and contractors involved with work on the site.

Policy 2 – Review of Policy

That the Conservation Management Plan should be reviewed on a regular basis, preferably at least once every ten years, or when new material which has the potential to supplant a present policy, is discovered. A reviewed CMP would also be required if operations on the site ceased and the use changed. This will ensure that new material or analysis can be properly assessed and if necessary incorporated into revisions of the CMP.

6.2.2 General Policies

Policy 3 – Retention of Key Heritage Elements

Elements of exceptional, high and moderate significance must be managed in accordance with their level of significance. That is:

- Elements/items of exceptional or high significance should be retained, maintained and preferably utilised; some change is acceptable and should be guided by a SoHI; and,
- Elements/items of moderate significance should be retained, maintained and utilised. Changes to these items is acceptable as long as those changes are guided by a SoHI and do not detract from the significance.

In addition, key elements/items of significance should not be demolished or removed and maintenance actions should be undertaken to stabilise their condition. Such works need only involve ensuring that monuments remain structurally sound. Elements of little, intrusive or no significance need only be retained and conserved where required. However, if demolition or removal is required, then consideration should be given to the impact of this action on the conservation of the exceptional, high and moderate significance site elements. Demolition or removal of elements of little, intrusive or no significance do not require heritage documentation; however the date of removal should be recorded in the CMP.

Policy 4 – Maintenance of Monuments

All work to the identified grave monuments/headstones/architecture within the curtilage, whether subject to planning permit conditions or not, will be required to be undertaken in accordance with the provisions of the Burra Charter. Any action which has the potential to alter fabric of monuments/headstones/architecture will require the preparation of a SoHI. It should be recognised that descendants may wish to install or restore grave monuments, and if this is to occur then the principles below should be followed. Cleaning of monuments during any maintenance regime should only take place for preservation or safety purposes. The following protocols for maintenance, cleaning and restoration are based on the National Trust *Guidelines for Cemetery Conservation* (2009) and are considered a best practice approach for the maintenance of monuments while retaining the heritage values of the Cemetery as a whole.

Maintenance, Cleaning and Restoration

- In general, maintenance schedules should ensure that the physical appearance of monuments should be preserved.
- If grave subsidence or exhumation occurs to a level sufficient to cause a falling hazard, then backfilling should occur, preferably with local ironstone gravel fill;

- If monuments are restored then any restoration works should reflect the appearance around the time of active operation of the cemetery, c 1909 - 1949.
- Lichen, moss or fungus growth should only be removed if its continued growth threatens the fabric of the monument.
- Broken headstones should be placed face up on the grave.
- Replacement of lead lettering may be re-hammered in place, but only by an expert mason.
- If carved inscriptions are to be replaced, then this work should only be undertaken by an expert mason.
- Cleaning should only be undertaken for maintenance purposes, i.e to preserve the monument, and use the following techniques:
 - Only water solutions should be used;
 - The use of hard bristles, scrapers, wire brushes, abrasive pads and/or high pressure pads should not be used;
 - Pre-wet the surface of the monument before applying any agents;
 - Monuments should be cleaned from the bottom up; and,
 - No ionic detergents should be used.

Policy 5 – Managing Vegetation Growth

The Waterfall General Cemetery has not been maintained since at least 1967 and as a result is heavily overgrown. The original Cemetery plantings of Radiata Pines and exotic grasses have mostly been burned out by bushfires and replaced by native Acacia and Eucalypt species. The current state of vegetation and deadfall presents significant trip hazards to visitors and potential threats to monuments. Ideally the vegetation should be encouraged to reach mature Silvertop Ash Ironstone Woodland while removing trip and tree fall hazards.

Tree Removal and Management

There are two main clusters of sandstone, marble and concrete grave monuments; the Roman Catholic and Presbyterian sections in the northwest and the Church of England section in the southwest of the Cemetery. Damage to monuments in these sections appears to be largely the result of tree fall and/or root lift damage. Vegetation should be selectively maintained in these main monument clusters (see Figure 5) by:

- A specialist arborist assessment should be undertaken to determine condition and risks of individual trees to monuments and advise on appropriate methods for removal, canopy reduction etc, if required;
- Clear access should be made possible through the central access road running east to west through the centre of the Cemetery.
- If required, prune limbs or remove trees that are a high risk of damaging monuments;
- If removal of a tree is likely to result in more damage to a monument than leaving it in place, then it should be left in place.
- Alternatives, such as to poison or ringbark damaging trees, may be considered if removal is not viable
- Implement a regular spraying/brushcutting maintenance program to control regrowth

Radiata Pines

There are a number of dead Radiata Pines that may present safety issues if they remain in the Cemetery. Ideally dead primary plantings of Radiata Pines should remain to aid interpretation of the original cemetery layout. The safety risk of these trees should be assessed by an appropriate specialist, if they present an unacceptable risk then the preferred management option should be to reduce trunk height to an appropriate level. If Radiata Pines are altered or removed, this work should be carried out in accordance with Policy 3 and 7.

Policy 6 – Interpretation & Access to Information

Interpretative material should be displayed at the Cemetery entrance and should at a minimum include a layout of the Cemetery to aid navigation through the Cemetery.

Given potential issues of public access to the Cemetery, options for placing a memorial wall in the Garrawarra Centre entry or area of open space should be considered. Such a memorial would provide an opportunity to the public to pay respect to family members as an alternative to visiting the Cemetery, particularly for those who may have physical difficulty in doing so. A memorial also provides an opportunity to provide an interpretive display of both the Cemetery and Waterfall State Sanatorium, in order to appropriately provide context for the role of these places in the larger fight against tuberculosis in NSW.

Additional options could include making interpretive information available electronically; this could include historical documentations, maps, the grave register and/or a virtual tour of the Cemetery. It is likely that such information could be produced in conjunction with a "Friends" group (see Policy 10).

Copies of historical documentation for the place should be retained by Wollongong City Council and the Local Studies Library at Wollongong City Library.

Policy 7 – Recording Heritage Items

Where an item or element is to be altered or removed, a record of the physical condition should be prepared prior to any works commencing. This record should entail photographs and an inventory of components, finishes, fittings and other details as appropriate.

Policy 8 – Archaeology

Discovery of Unanticipated Aboriginal Cultural Material

The following contingency plan describes the actions that must be taken in instances where Aboriginal cultural material is discovered or unearthed by works onsite:

- **Discovery:** Should unanticipated Aboriginal cultural material be identified during any works, works must cease in the vicinity of the find.
- **Notification:** OEH must be notified of the find.
- **Management:** In consultation with OEH, registered Aboriginal parties and a qualified archaeologist, an impact assessment should be undertaken and management strategy developed to manage the identified Aboriginal cultural material. A subsidence monitoring program may be required for Aboriginal sites, using a methodology consistent with that outlined in Section 6.
- **Recording:** The find will be recorded in accordance with the requirements of the National Parks and Wildlife Act 1974 and OEH guidelines.

Discovery of Unanticipated Historical Relics

The following contingency plan describes the actions that must be taken in instances where historical cultural material is discovered or unearthed by works on site:

- **Discovery:** Should unanticipated historical material be identified during any works, works must cease in the vicinity of the find.
- **Notification:** OEH must be notified of the find.
- **Management:** In consultation with OEH and a qualified archaeologist, an impact assessment should be undertaken and management strategy developed to manage the identified historical cultural material. A subsidence monitoring program may be required for historical sites.
- **Recording:** The find will be recorded in accordance with the requirements of Heritage Branch and OEH guidelines.

Discovery of Unanticipated Human Remains

The following contingency plan describes the actions that will be taken in instances where human remains or suspected human remains are discovered. Any such discovery in the study area will follow these steps.

- **Discovery:** If suspected human remains are discovered all activity in the vicinity of the human remains must stop (to ensure minimal damage is caused to the remains), and the remains must be left in place and protected from harm or damage.
- **Notification:** Once suspected human skeletal remains have been found, the Coroners Office and the NSW Police must be notified immediately. Following this, the find must be reported to OEH and it is recommended that it is also reported to the Illawarra Local Aboriginal Land Council.
- **Management:**
 - If the human remains are of Aboriginal ancestral origin an appropriate management strategy will be developed in consultation with a heritage specialist, registered Aboriginal parties and OEH.
 - If the human remains are identified as historical relics then an appropriate management strategy will be developed in accordance with a heritage specialist and NSW Heritage Council.
 - If the exhumation of human remains is subsequently required, these works may require a permit under the *Public Health Act 1991* and advice should be sought from an appropriate heritage specialist.
- **Recording:** The find will be recorded in accordance with the requirements of the National Parks and Wildlife Act 1974 and OEH guidelines as applicable and registered on AHIMS (if applicable).
- **Recommencement of works:** Works are to recommence only after all previous steps have been taken, an adequate management strategy is in place and authorisation has been received from DoPI.

Policy 9 – Heritage Status

The Waterfall General Cemetery is currently listed on the Wollongong 2009 LEP (Garrawarra Hospital Cemetery Item 61028) and separately from the former Waterfall State Sanatorium (now the Garrawarra Aged Care Centre). While separated administratively in 1967, previously the sites were directly connected by Waterfall State Sanatorium operations. In order to ensure that the associated heritage values of both sites are appropriately managed, consideration should be given to listing the sites as one entity on the Wollongong LEP and extending the conservation area for the Garrawarra Aged Care Centre to include the Cemetery.

Given the heritage values of both sites and their importance in the history of managing tuberculosis in NSW, consideration should be given to the nomination of both sites as a single item to the State Heritage Register. While nomination to the State Heritage Register is not guaranteed, a successful listing would make the site eligible for heritage conservation grants.

Policy 10 – Consultation and Community / Stakeholder Involvement

While isolated, there is a general community interest in the Waterfall General Cemetery, particularly from local historical societies. An opportunity exists to establish a "Friends of the Cemetery" group, which may allow active participation in the maintenance regime for Cemetery and also contribute in arranging group access and interpretive tours. In consultation with Council, broad long term goals should be established for the group and then a clear series of short term goals determined to meet these objectives. A combination of long and short term goals is important to establish a clear direction for the group and to maintain both momentum and enthusiasm for the project.

Policy 11 – Public Access

Public access to the Cemetery is desirable, but is presented a number of challenges in terms of management, primarily because of the isolation of the site and lack of legal public access. The isolation of the Cemetery and lack of regular observation potentially presents a challenge in monitoring for vandalism, unauthorised access and use of the site.

The potential for vandalism is currently restricted by the lack of direct access to the Cemetery, particularly vehicle access, which if provided without any form of monitoring would significantly increase the risk of vandalism. Bushwalkers can currently access the Cemetery via catchment tracks and is difficult to prevent or monitor. Soft control measures, such as fencing, would be appropriate in reducing the risk of vandalism from bushwalkers.

Appropriate measures to control direct access to the site may include:

- Fencing;
- Signage;
- Providing a visitors book;
- Installation of gates; and
- Installation of security cameras.

Any measure used to control access to the site needs to avoid being intrusive to the heritage values of the site, e.g a high chain link fence around the Cemetery would be an intrusive element and detrimental to the overall setting of the place. Appropriate signage is most likely to be the most effective approach in preventing accidental impacts, as currently the Cemetery is not immediately distinguishable from its surrounds.

Public Access could be potentially managed in combination with Policy 6 and Policy 10 by:

- Providing offsite interpretation (memorial) to allow public interaction with the larger Waterfall State Sanatorium site and pay respects to family members; and
- Schedule regular guided trips, possibly via a "Friends of the Cemetery" group, to the Cemetery to allow direct access and appropriately arrange access.



Figure 5: Vegetation Clearance Areas

Table 12: Summary of site elements and their conservation requirements

Element	Significance	Applicable Conservation Policies (marked with X if applicable)						Statement of Heritage Impact Required (Y = Yes, N = No, U = Unacceptable action, C = acceptable for conservation purposes only, N/A = Non applicable)	
		Policy 3	Policy 4	Policy 5	Policy 6	Policy 7	Policy 8	Demolition or Removal	Alteration of fabric
Access Road, Fencing and Western Entrance	Moderate	X	X		X	X		U	C
Radiata Pine Remains	Moderate	X	X			X		C	C
	Intrusive					X		Y	Y
Grave Plantings	Moderate	X	X			X		U	C
Silvertop Ash Ironstone Woodland	High	X		X				C	C
Graves	Exceptional	X	X		X	X	X	U	C
Car Wreck	Intrusive							Y	Y

7 Recommendations

The following recommendations are made in regards to the Waterfall General Cemetery.

Recommendation 1: Nomination of the Waterfall General Cemetery and Waterfall State Sanatorium sites to the State Heritage Register

As per Policy 9, it is recommended that the Waterfall General Cemetery and Waterfall State Sanatorium (now the Garrawarra Aged Care Centre) should be nominated to the SHR as a combined listing.

Recommendation 2: Update Wollongong LEP 2009 Heritage Schedule

As per Policy 9, it is recommended that the Waterfall General Cemetery and Waterfall State Sanatorium (now the Garrawarra Aged Care Centre) should be updated on the Wollongong LEP 2009 Heritage Schedule as a single entity.

Recommendation 3: Adoption of the Conservation Management Plan

As per Policy 1, Wollongong City Council should adopt the CMP for the Waterfall General Cemetery site as the document guiding appropriate change to the significance of the site.

Recommendation 4: Review of the Conservation Management Plan

As per Policy 2, the Conservation Management Plan should be reviewed on a regular basis, preferably at least once every ten years, or when new material which has the potential to supplant a present policy, is discovered.

Recommendation 5: Managing Change

Where changes to the study site have the potential to impact on heritage items, a SoHI should be prepared. Using this CMP as a guiding document, SoHIs should be prepared in accordance with Heritage Council guidelines for SoHI (Appendix 1) and should only be as detailed as required by the proposed work. Acceptable change should be based on Table 12.

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APPENDIX 1: How to prepare a statement of heritage impact

DISCUSSION PAPER:
ISSUES AND OPTIONS FOR THE FUTURE
MANAGEMENT OF WATERFALL GENERAL
(GARRAWARRA) CEMETERY



SEPTEMBER 2013

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1.0 INTRODUCTION

On the 27 August 2012 Wollongong City Council considered a report on the Waterfall General (Garrawarra) Cemetery and resolved to receive a future report following further work being undertaken to understand the current issues, risks, costs and community views in relation to the future management of the Cemetery.

This Discussion Paper has been developed with the intention of providing an update in relation to the progress of works undertaken since the Council report. It also outlines the various management options available to Council for the future management of the various problems and issues presented by the Waterfall General (Garrawarra) Cemetery site.

This document is intended to inform a discussion between Council and the community, to assist the public engagement process, and to ensure that the community has an opportunity to provide informed input into the future management of this important historic site. This document is not intended to provide an indication of Council's current plan or position in relation to the Cemetery, but rather to present the range of available options relevant to various aspects of future site management and to highlight potential issues and points of relevance to these options. Council is calling for community input in relation to these options, and more generally, in relation to Council's future management of the site.

2.0 BACKGROUND

The former Waterfall Sanatorium (now Garrawarra Centre) is located on the Old Princes Highway between Waterfall and Helensburgh. The facility operated under various names between 1909 and 1957. It was originally known as the 'Hospital for Consumptives', then the 'Waterfall State Sanatorium for Tuberculosis'. In 1958, the hospital was converted to a centre for the aged and chronically ill and became known as the Garrawarra Hospital before coming to its current title.

The Garrawarra Cemetery is located on the Old South Coast Road (now a fire trail) approximately 700 metres south of the Garrawarra Centre. In 1907, the Waterfall General Cemetery was established. The site received over 2,000 burials between 1909 and 1949. Almost all of the people buried in the cemetery were tuberculosis patients treated at the Sanatorium or Hospital with which it is associated.

In 1967, responsibility for care and control of the Cemetery was handed to Council from the State, along with the Wollongong, Bulli, Scarborough, and Helensburgh General Cemeteries. A review of Council's records has indicated that little (if any) maintenance of the Cemetery by Council has occurred since this time. There are many issues to consider regarding future management of the site as the Cemetery is very overgrown and there is no formal public access to the site.

A study of the Cemetery was undertaken by John and Carol Herben, members of the Illawarra Historical Society, in 2000. The Herbens raised the matter of the maintenance of the Cemetery with Council in 2000 but no action was taken at that time. In 2011,

care and control responsibilities for Waterfall General Cemetery were raised with Council again by the Helensburgh Historical Society. Council has since acknowledged its responsibilities for the Cemetery and has been working towards establishing an appropriate management response.

To this end, Council at its meeting of 27 August 2012 considered a report on options for the future of the Waterfall General (Garrawarra) Cemetery and subsequently resolved that:

1. *Stage 1 of the proposal detailed in the report be undertaken, including:*
 - a) *Preparation of a Conservation Management Plan;*
 - b) *Further explore access options/arrangements;*
 - c) *Undertake a risk assessment;*
 - d) *Undertake community consultation including with families of those buried in the cemetery;*
 - e) *Explore possible sources of funding for the site;*
 - f) *Consider the potential for a 'Friends of the Cemetery' or a 'Cemetery Conservation' group;*
 - g) *Pursue and make publicly available a burial register for the site.*
2. *Following completion of stage 1, a further report be provided to Council detailing the outcomes of stage 1 and the options available for future ownership, management, interpretation and public accessibility.*
3. *Council write to the NSW Office of Environment and Heritage outlining support for consideration of the Garrawarra Hospital site, including the Cemetery, for listing on the State Heritage Register.*

The Council report of 27 August 2012 forms part of the exhibition documents, and provides additional background to the issues presented by the Cemetery.

3.0 PROJECT UPDATE

Since August 2012, Council staff have been working through the range of issues identified in the Council resolution with a view to clarifying and resolving the various issues to inform a detailed consultation process with the community. Updates in relation to the issues listed as a) to g) in part 1 of Council's resolution are discussed in detail below.

Two additional matters, related to the planning context and land use zoning of the site, as well as the heritage listing, of the site have also been added to ensure full coverage of the issues.

3.1 Conservation Management Plan

A draft Conservation Management Plan (CMP) has been prepared for the Cemetery by BIOSIS. The draft CMP outlines the history and significance of the site and makes a range of broad policy recommendations relating to the future management of the Cemetery. This document forms part of the exhibition documentation and should be referred to for full details. Stakeholders and community members are encouraged to read and consider this document in making comment on the proposed future management of the site.

The draft CMP provides policy recommendations that support the ongoing conservation of the Cemetery through the establishment of a 'bush cemetery'. This is based on recognition that the period of no maintenance is a significant part of the history and cultural significance of the Cemetery. The conservation policies within the document support the retention of surviving Cemetery fabric, including monuments and grave markers and notes that the Cemetery is considered to be of State Heritage Significance as part of the broader Waterfall Sanatorium site.

The draft CMP supports the active management and maintenance of monuments, the active management, selective removal, and maintenance of vegetation on the site including the clearing of the central access driveway, ongoing community and stakeholder involvement in the Cemetery's management and decision making, and the opening up of the Cemetery (in some form) to public access.

3.2 Site Access

The site is in a remote location and surrounded by bushland. The nearest development is the Garrawarra Centre (and former hospital to which the Cemetery relates) and this is located approximately 700m north of the Cemetery site.

The Cemetery is surrounded by Crown Land that is under various management authorities within the State Government including the Department of Health, the Sydney Water Catchment Management Authority, Crown Lands and Roads and Maritime Services. There is no formalised legal access to the Cemetery site from surrounding public roads and as such, access to the Cemetery is currently obtained via the Garrawarra Centre, requiring Council staff and other visitors to sign in via the Centre's Administration Centre and obtain keys to the locked gate.

The Cemetery is located approximately 20m east of a dirt road which once served as the South Coast Road (the original roadway direct from Sydney to Wollongong). This road has a locked access gate to the south off the Old Princes Highway and to the north

another locked access gate at the present southern boundary of the operational component of the Garrawarra Centre.

Contact with the Department of Crown Lands has indicated that negotiation of a formalised legal access way could be negotiated. This could be achieved through the granting of an easement to Council and/or through a passing of care and control responsibilities to Council for ongoing maintenance of the access drive. Either of these options are likely to result in Council becoming responsible for the ongoing maintenance and improvement of the access road and as such, this may have additional cost and risk implications for Council.

3.3 Risk Assessment

The site is currently very isolated, heavily overgrown and well concealed by bushland. The site shows evidence of infrequent visitation by members of the community and this is supported by anecdotal evidence and reports of visitation by interested community members.

Given the overgrown nature of the Cemetery, the presence of subsided graves, the large amount of deadwood and fuel load for fires and the isolation of the Cemetery, the site presents a range of risks to people visiting the Cemetery, including Council staff and contractors. These risks include a high potential for bushfires, similar to those which affected the site in 2001.

It is noted that Council has received advice from the Ministry of Health, Public Health Unit which indicates that there is no risk of Tuberculosis infection from the Cemetery unless human remains are being disturbed. Even in this event the risk of infection is considered very low as the TB virus has been found through studies to not survive long in the soil. Given the 64 year period since the last burial in the Cemetery, the risk of infection is considered very low. Further investigations into relevant precautions would need to be considered if any future plans required the disturbance of human remains.

All site risks need to be considered as part of the consideration of future management options. Further, risk management controls will need to be considered and implemented as part of any future site management option to ensure that the safety of the community, and Council staff, as well as Council's liabilities, are managed as part of any future management approach. A detailed risk assessment for the Cemetery is currently being finalised and will require ongoing review and consideration.

3.4 Consultation (Internal and External)

Following Council's resolution of 27 August 2012, Council sought registrations of interest from the community through advertisements and articles in the local media, as well as through coverage in the Sydney Morning Herald and other broader channels. From this, a list of stakeholders was compiled. This includes family descendants of those buried within the Cemetery, local historical interest groups, researchers as well as various government agencies who have a direct or indirect interest in the Cemetery and its future management. Council staff have been liaising with these people as part of the process to date, to ensure they have been kept up to date with the progress of the project.

Understandably, there is strong interest from some family members in wanting to be able to visit and access the Cemetery to visit loved ones and ancestors' graves. Some

descendants have also expressed an understandable level of frustration at the current state of the property and the lack of accessibility to the site. It will be necessary and important to keep up the lines of communication with family members during all stages of the process.

Council has also had ongoing contact with the Illawarra and Helensburgh Historical Societies throughout the project and has received valuable input from these groups. Local historical researchers who have an interest in the Cemetery and its history have also provided valuable input and assistance to this process.

The Wollongong Heritage Advisory Committee have received regular updates on the project and provided informal input to the project to date. Formal involvement from the Heritage Committee and all other registered stakeholders will be invited during the current community engagement phase of the project.

3.5 Funding

The availability of funding for Cemetery Conservation and works has been explored.

Funding may be available under the Public Reserves Management Fund which is available for Crown Reserves. It is noted however that the Cemetery does not fall within the target reserve types for the funding. Applications are invited annually. Council will further explore these options in relation to particular management outcomes once these are determined.

Other likely grant funding options are largely restricted to Heritage Funding offered by the State and Federal Governments under their respective programs. These programs generally restrict funding to being available to sites of State and/or National Significance and that are listed on the State Heritage Register and/or the National Heritage List. The Conservation Management Plan for the Cemetery site has found that the site is of State Heritage Significance as part of the broader Waterfall Sanatorium. As such, if the site was successfully nominated for listing on the State Heritage Register then grant funding options may become available for the site in the future.

The NSW Government offers funding under the NSW Heritage Grants Program and offers grants of up to \$150,000 on a dollar for dollar basis, for conservation works projects.

The Federal Government also offers grant funding programs for heritage sites from time to time, though these programs vary in their requirements and are not currently open for applications.

These funding options will continue to be considered and explored.

3.6 Community Involvement in Management (Friends or Conservation Group)

One of the options for the future management of the Cemetery is the establishment of a community based management or 'friends' group, to assist with the ongoing management of the Cemetery. Some stakeholders have already indicated a willingness to be involved in a friends group.

This group could have two important functions in relation to Cemetery Management: Firstly, as a community group to assist with management decision making and site planning and secondly; as a group of volunteers who may be able to assist by providing practical support with the ongoing management of the Cemetery.

This practical assistance could take the form of:

- Historical research;
- Documentation/recording of the Cemetery;
- Working bees and site clean-up days;
- Bushcare style vegetation management;
- Grave conservation works/planning;
- Volunteer guides/assistants for open days;
- Fundraising and sourcing of grants.

Practical details of how a “Friends Group” or “Cemetery Conservation Group” might be structured and formed requires further resolution and would be reliant on sufficient interest from stakeholders and the community. Wollongong has two current comparable groups that operate under different management models and that could provide useful models for the formation of such a group. These groups include the Berkeley Pioneer Cemetery Restoration Group and the Friends of Scarborough Cemetery Group. There are also a wide range of models and other examples of such groups throughout the State. Council’s Bushcare Program and the Friends of the Wollongong Botanic Garden may also provide useful models for consideration.

Council is seeking, as part of the community engagement process, expressions of interest from community members who would like to take an active role in the future management of the Cemetery, by being part of a “Friends of the Cemetery” or “Cemetery Conservation Group”, if one is formed.

3.7 Burial Register

Council has obtained a copy of the original burial records for the Cemetery from NSW Records. These records form part of the exhibition material and can be viewed on Council’s website, at the Wollongong Council Administration Building or at the Wollongong City Library. These records provide details of those buried in the Cemetery including dates of death, grave numbers, religious denominations, undertaker’s details and full names.

Council is still working towards obtaining and supplying electronic records for the site and is continuing discussions about obtaining this information to enable easier access and search capabilities to the Cemetery records.

3.8 Planning Context and Land Use Zoning

The site is currently zoned E3 Environmental Management. The objectives of this zone are focused on protection and management of areas with special values (aesthetic, ecological, scientific, and cultural). The zone allows a limited range of land uses which will not have an adverse impact on these values.

As part of the Helensburgh 7(d) lands review, the site was proposed, under the exhibited draft plan, to be rezoned to E2 Environmental Conservation, which would have further restricted permissible land uses. Given the separate consideration of the management

issues relating to the Cemetery, and given that cemeteries are not a permitted land use in the E3 Environmental Management or the E2 Environmental Conservation zone, Council resolved to retain the E3 Environmental Management zone over the Cemetery site until the appropriate zoning of the site is determined through the present considerations of future management of the Cemetery.

Whether the zoning needs to be changed to allow Council to maintain and manage the cemetery will need to be determined as part of the process of consideration. Council's operational cemetery sites are zoned as SP2 Special Uses – Cemeteries, which is a specific zone that allows for the management of a cemetery. This zoning may provide a more suitable land use zone for the ongoing care and conservation of the Cemetery depending on the intended management response.

3.9 Heritage Listings

The Waterfall General (Garrawarra) Cemetery site is currently listed as a local heritage item under the Wollongong Local Environmental Plan 2009. There are separate heritage listings related to the former Waterfall Sanatorium (Garrawarra Hospital) site to the north. It also lists the Garrawarra Hospital Conservation Area, which covers the former Sanatorium and Hospital site but does not currently include the Cemetery within its boundary.

The Waterfall General Cemetery Conservation Management Plan for the site, prepared by BIOSIS, recommends that the Cemetery, along with the Sanatorium site meet the criteria for listing on the State Heritage Register and that a nomination for listing of the broader site should be made to the NSW Heritage Council. Further, this report recommends the consolidation of the listings under one listing to acknowledge the linked nature of significance attached to the two sites.

3.10 Short Film Production

Due to the limitations, both legal and practical in relation to site accessibility, it is not anticipated that a site visit or inspection will be able to be organised and incorporated into the community engagement and consultation process. It is understandable that this is a matter of concern to stakeholders and that this limits the ability of the community to make informed comment in relation to the Cemetery's future management.

In recognition of this, Council engaged Gooseboy Productions, a professional video production company, to prepare a short documentary film for the Cemetery site to allow members of the public, and stakeholders, to obtain a virtual experience of the Cemetery. This film will be launched at the commencement of the community engagement phase and allow people to experience the setting and understand more directly the current condition of the place, without visiting the Cemetery.

This documentary film provides the additional advantage of providing a permanent record of the site's condition prior to any decision making and works. This will also act as an interpretive device and permanent record of the Cemetery for the future. The short, and long, versions of the documentary film can be downloaded from the exhibition webpage.

4.0 KEY ISSUES AND OPTIONS

This section of the discussion paper provides a summary of the key issues or decision points relevant to the future management of the Cemetery and discusses the options available for consideration. It is noted that for each matter, a range of options have been identified and discussed. Whilst the various options are discussed and some of the advantages and disadvantages of the options are detailed, this paper stops short of recommending a particular outcome. This is to ensure that the community input has a genuine opportunity to inform the recommendations of a future Council report in relation to future management.

4.1 Future Custodianship

The Cemetery is located on Crown Land that has been placed in the Care and Control of Wollongong City Council. Consultation with the Crown Lands Division of the Department of Trade and Investment has indicated that there is potential for the State Government to resume responsibility for the site. If Council were to consider a potential hand back of the site to the State, this is likely to result in the land either being placed in the Custodianship of the Crown Lands Division for direct management or being designated to the National Parks and Wildlife Service for addition (as part of a broader area including the sites surrounds) to the Garrawarra State Conservation Area.

Council therefore has two potential options in relation to future custodianship of the site and these are discussed below:

OPTION 1 – Retain in Council's Care and Control

This option would maintain the status quo and would ensure local care and control of the Cemetery as well as continued local involvement, and stakeholder involvement in decision making. This option would be consistent with the other General cemeteries located throughout Wollongong (including Helensburgh, Scarborough, Bulli and Wollongong).

The retention of care and control by Council would ensure ongoing community and stakeholder involvement in the decision making process, however, the costs of future management of the site, and ongoing risk liabilities will need to be considered carefully.

OPTION 2 - Pursue a Hand Back of the Site to the State Government

This option would have significant cost and risk management advantages to Council in that the problems of future management would be worn by the State. It is unclear however what the implications of this option would be in relation to the future management of the Cemetery. Council would have no control over the future management of the site and this may result in a poor outcome in relation to the future management of the Cemetery and its significance as a heritage site. It is also likely that this would reduce the potential for involvement of the community in the future management and decision making related to the site.

There is also a need for further consultation with the State Government in relation to Option 2, as no agreement or arrangement has been reached and

there is no assurance that it would be resumed to State care and control. Option 2 is therefore currently theoretical only.

4.2 Management Strategies

If Council is to maintain care and control of the Cemetery in the future, Council could consider a range of overall management strategies. These options would fall on a continuum of taking no action, to removing nearly all vegetation and re-formalising the Cemetery. For the purpose of discussion, three 'options' along this continuum have been defined for consideration and discussion as part of the engagement process. The determination of the appropriate future management strategy is likely to be the key initial consideration for Council and is therefore a key consideration for the community consultation.

Key matters to consider in the options below relate to the cultural significance of the site, the environmental values of the site, and the surrounding land, and the social significance attached to the old Cemetery and those buried within it.

OPTION 1 – Minimal Intervention

This option essentially involves a continuation of the current lack of management, with recognition that certain liability issues would need to be addressed.

The site has been effectively unmanaged since at least 1967, though anecdotal evidence indicates that management had ceased even earlier and likely back in around 1950, following the last burial in the Cemetery (1949) and the cessation of use of the site as a Tuberculosis treatment centre.

This option would involve the use of minimal intervention, largely focussed on the reduction of liability through the introduction of appropriate warning signs to the site. This option would result in the Cemetery continuing to be resumed by the bush, and is likely to have positive environmental outcomes, but result in a gradual loss of cultural significance, and the continued loss of the opportunities for the family and descendants of those buried the Cemetery to be able to visit and appreciate the last resting place of their ancestors.

This option is not supported by the Conservation Management Plan.

OPTION 2 – Establish a Bush Cemetery

This option essentially involves the adoption of the approach recommended by the Conservation Management Plan developed for the site. This would involve the clearing of destructive vegetation from within and adjacent to remaining grave sites, the removal of deadwood from the site, the reinstatement of a central access pathway/road and then the ongoing management of the Cemetery within its bushland environment. This management would be focussed on the active management of risks, and active management of conservation of remaining Cemetery features identified as having significance and making a contribution to the site.

This option will carry considerable cost to Council in that an initial outlay of expenditure would be required to bring the site under control. Beyond that,

ongoing management of the site, to manage risks, control vegetation and ensure conservation of Cemetery features including graves and grave architecture would be required. It is likely that interpretation material and signage will also be required to ensure the site can be understood and appreciated by visitors.

Management of a Bush Cemetery could take various forms and reach varying levels of formality and access. There is also strong potential for involvement of a “Friends of the Cemetery Group” or a “Cemetery Conservation Group” to be formed to assist at a practical level with the ongoing management of the Cemetery.

OPTION 3 – Establish a Formalised Cemetery

The re-formalisation of the Cemetery into a traditional Cemetery environment, with the removal of the majority of vegetation, is a further option that has been considered. This option is not supported by the Conservation Management Plan as it would ignore the significance of the 70 year period in which the Cemetery was forgotten about and allowed to become overgrown. Further, this option would carry considerable expense and is likely to result in further management issues related to the site’s isolation, access issues and other such problems.

4.3 Access Options

Council currently has no legal access to the Cemetery without crossing Crown Land under various areas of State Government Management. Council staff and contractors have to date been gaining access via the permission of the Garrawarra Centre and this requires visitors to sign in and obtain a key to get access through the locked gate. For this reason, the Cemetery is currently not publicly accessible.

The exploration of access options will therefore be reliant upon the establishment of a legal access to the Cemetery. Initial advice from the Crown Lands Division of the NSW Department of Trade and Investment has indicated that this is likely to be able to be established and that this could occur through the provision of an easement or through the potential transfer of an access handle to Council. Assuming that this can be satisfactorily resolved, Council has a number of options that could be explored for providing future access to the Cemetery.

It is noted that some public access options are better suited to particular management strategies and would not be suitable for others. It is further noted that the full range of options have been presented to ensure that these can all be considered by the community engagement process.

OPTION 1 – Formalised Vehicular Access

This would involve the formalisation of an access road and provision of parking. This would have considerable financial and planning approval consequences and complexities and would be subject to negotiations over legal access to the site.

OPTION 2 – Informal Vehicular Access

It may be possible to provide an informal vehicular access to the Cemetery via the dirt trail that runs past the cemetery. This access is currently used by various

State Government agencies and will require a process of negotiation. Limited informal parking could potentially be established at the site.

OPTION 3 – Open Pedestrian Access

There is strong evidence indicating that the site is already being accessed occasionally by members of the public who walk to the site via the trail. If the location of the Cemetery was signposted, this style of access could provide the opportunity for walkers to access the site.

Vehicular access would still need to be established for maintenance of the site and consideration would need to be given to providing opportunity for equitable access options as many visitors may not be capable of walking to the site.

OPTION 4 – Public Open Days

If Council were to decide that open public access of the site is not a suitable outcome, or if legal access cannot be obtained to the site, it may be possible to establish regular open days or visitation days, where the public are invited to visit the site during specified times.

OPTION 5 – No Public Access

This option would involve a continuation of the current access arrangements, where no formal provisions for access are made. Council could also consider erection of signage and other measures to prevent public access. This option is not supported by the Conservation Management Plan.

Council staff would require ongoing access for management and monitoring of the site.

4.4 Planning/Land Use Zoning

The Cemetery site is currently zoned E3 Environmental Management under the Wollongong Local Environmental Plan 2009. There are a number of options available for the future zoning of the site and these are detailed below:

OPTION 1 – Retain E3 Environmental Management Zone

The site is currently zoned E3 Environmental Management. This zone does not permit the operation of a Cemetery and is focussed on Environmental objectives. As the Cemetery is not in use, this does not in itself pose a problem for future management of the site. It is noted however that if Council decides to pursue the reopening of the Cemetery to the public, and the clearance of some vegetation to support the conservation of the site, this may be more complicated in an environmental zoning.

OPTION 2 – SP1 Special Activities (Cemetery)

This is a special zone, specifically for the purpose of allowing for the operation and management of a Cemetery. This zone is used for Council's active Cemeteries. Whilst the Cemetery is not operational, this zone is likely to simplify the planning approval requirements for future management of the Cemetery. Preliminary assessments of the flora and fauna issues across the site have

indicated that limited clearing within the Cemetery is unlikely to have significant consequences on significant vegetation communities or rare or endangered fauna. The site's location in a bush setting within close vicinity to the Garrawarra State Conservation Area and the Sydney Water Catchment area, means that consideration of the impacts of future zoning and management responses need to be carefully considered in this context.

OPTION 3 – E2 Environmental Conservation

The land surrounding the Cemetery is currently subject to a separate Planning Proposal process in which the surrounding land is proposed to be zoned E2 Environmental Conservation. This zone is focussed on the conservation of environmental values and is likely to present complexities in terms of the future management of the Cemetery. Given that the surrounding lands are proposed to be zoned E2 Environmental Conservation however, consideration could be given to applying this land use zone to the former Cemetery site, particularly if the 'limited management' strategy is pursued.

4.5 Heritage Listings

The Waterfall General (Garrawarra) Cemetery site is currently listed as a local heritage item under the Wollongong Local Environmental Plan 2009. There are separate heritage listings related to the former Waterfall Sanatorium (Garrawarra Hospital) site to the north. It also lists the Garrawarra Hospital Conservation Area, which covers the former Sanatorium and Hospital site but does not currently include the Cemetery within its boundary.

OPTION 1 – Retain Current Heritage Listing Arrangements

Council could retain the existing heritage listings for the site.

OPTION 2 – Consolidate the Heritage Listings

The Waterfall General Cemetery Conservation Management Plan, prepared by BIOSIS recommends that the Cemetery, along with the former sanatorium/hospital site should be consolidated into a single listing under the Wollongong Local Environmental Plan 2009 to acknowledge the linked nature of the significance attached to the two sites. This option would largely negate the need for the Heritage Conservation Area as the listing would cover the broader landscape and provide the same statutory protections to the whole site.

OPTION 3 – Retain Current Listings and Amend Conservation Area Boundary to Include Cemetery

This option would involve the retention of the existing heritage listings for the separate site components, but would expand the boundary of the Garrawarra Heritage Conservation Area to include the Cemetery site.

ADDITIONAL CONSIDERATION – Nomination of Site to the State Heritage Register

The Waterfall General Cemetery Conservation Management Plan also recommends that the Cemetery, along with the former Waterfall State Sanatorium site, meet the criteria for listing on the State Heritage Register. The report recommends that a nomination for listing of the broader site on the State Heritage Register should be made to the NSW

Heritage Council. A State Heritage Listing of the site could open up access to additional funding opportunities, though it may also increase the regulatory requirements for future management of the Cemetery.

Council could consider preparing a nomination for listing on the State Heritage Register, in consultation with the NSW Ministry for Health (who own the former Sanatorium) as an independent consideration, regardless of which option is chosen from above.

5.0 HOW TO HAVE YOUR SAY

Council considers the views and opinions of the community, and the stakeholders with an interest in the Cemetery an important part of the process of considering future management options for the Waterfall General (Garrawarra) Cemetery site. As such, it is considered important to present a range of options for future management of the Cemetery as part of the community consultation process, rather than presenting a recommended management approach. This is to ensure that the Community's views and opinions can truly influence the proposed management response that will be recommended to Council in the future.

All stakeholders and members of the community are being invited to comment on the future management of the Cemetery by commenting in relation to the range of issues and options outlined in this discussion paper.

Council is also calling on community members to express an interest in being part of a potential future "Friends of the Cemetery Group" or "Cemetery Conservation Group" and are encouraged to indicate this interest during the consultation process.

The exhibition documents, including:

1. This discussion paper;
2. The draft Conservation Management Plan by BIOSIS;
3. The Documentary Film;
4. The original Burial Records;
5. Site Photographs;
6. The Council report of 27 August 2012;

will be available from Council's Website, the Wollongong Council Administration Building and all branches of the Wollongong City Library, during the exhibition.

The exhibition period will run from 20 September 2013 to 15 November 2013 and all interested people are invited to provide their comments during this period. Submissions can be made in writing to Wollongong City Council by post to Locked Bag 8821, Wollongong DC, NSW 2500, by email to records@wollongong.nsw.gov.au or by visiting Council's website www.wollongong.nsw.gov.au.



WATERFALL GENERAL (GARRAWARRA) CEMETERY: A PHOTOGRAPHIC INDEX OF IDENTIFIABLE GRAVES



PREPARED FOR THE COMMUNITY ENGAGEMENT PROCESS FOR WATERFALL GENERAL CEMETERY

SEPTEMBER 2013

INTRODUCTION

The Purpose of this document is to provide a photographic index of graves which remain identifiable within the Cemetery. It is of note that there are additional graves that this report only provides details of those graves which retain inscriptions that are sufficient to allow cross reference with the burial registers to reveal the identity of the grave.

The Cemetery also retains evidence of other graves that have not been able to be readily identified due to their condition, and given the overgrown nature of the site. It is also anticipated that additional graves will come to light over time, and particularly if clearing of some of the deadwood throughout the Cemetery were to occur at some time. There are also many graves marked simply with a timber stake, which have since been burnt by fire, but in many cases are still visible. Others are marked with ironstone surroundings.

LIST OF IDENTIFIED BURIALS/INDEX

This section provides a list of the 54 identified graves so far located throughout the Cemetery. Some of the details from the burial register have been copied from the original burial registers, including the Cemetery Section, Row and Grave number. For those remaining graves where a death date was given and identifiable on the headstone, this date is given. For those that do not have an identifiable date of death, the burial date is provided as per the burial register.

There are some discrepancies between the details in the burial register and the graves. This was particularly the case for the age at time of death, which seems to vary between the register and the headstone. Where these discrepancies have occurred, the headstone description has prevailed, though it is noted that ages at death, in some cases, should be regarded as a guide, and not necessarily an accurate figure.

The number column is a unique index which can be used to navigate this document provided for the purpose of this document and makes no reference to the original burial register.

Notes are marked with **, and explanations are provided at the end of the table.

No.	Name	Death Date (age)	Section	Row, Grave
1	P. J. V. Hanlon	2 Sep 1916 (20)	Roman Catholic	K, 17
2	<i>P. J. V. Hanlon (Duplicate) – plaque now removed*</i>	<i>2 Sep 1916 (20)</i>	<i>Roman Catholic</i>	<i>Duplicate</i>
3	Joseph Taylor	14 Mar 1920 (31)	Roman Catholic	Q, 17
4	Edmund Curry	29 Feb 1939 (26)**	Roman Catholic	R, 27
5	Francis Vincent McCarthy	31 July 1920 (25)	Roman Catholic	Q, 25
6	Thomas Goodman	15 Sept 1929 (59)	Presbyterian	Q, 5
7	Alice Delaney	18 Feb 1917 (42)	Roman Catholic	L, 18
8	Margaret Coleman	12 Jan 1916 (27)	Roman Catholic	J, 16
9	Mary Greentree	21 March 1915 (22)	Presbyterian	E, 11
10	Bill & John Christie	John 20 Nov 1936 (20), Bill????***	Presbyterian	B, 17
11	Horace James Wilson	1 Oct 1930 (30)	Presbyterian	A, 17
12	Alex Raeburn Aitken	5 June 1911 (30)	Presbyterian	Sec A, 19
13	Harry Handcock	5 Oct 1926 (30)	Church of England	A, 24
14	Arthur H Dyer	1 July 1923 (43)	Church of England	D, 30
15	William Edward Frank Vaughn	19 Feb 1924 (17)	Church of England	E, 35
16	Horatio Henry Baker	18 Apr 1925 (55)	Church of England	G, 47
17	Thomas Wellwood	13 July 1917 (60)	Church of England	M, 46
18	Peter Clark	Burial 6 Oct 1920 (52)	Church of England	S, 42
19	Ernest Montague Clark	17 Dec 1913 (29)	Church of England	H, 37

No.	Name	Death Date (age)	Section	Row, Grave
20	Martha May Hawke	17 Feb 1915 (29)	Church of England	F, 30
21	Nellie Armson	18 Dec 1915 (42)	Church of England	K, 32
22	Amy Urquhart Paton	21 Sept 1925 (52)	Church of England	H, 28
23	Gertrude Maud Feline	Burial 21 Dec 1927 (32)	Church of England	K, 25
24	Brenda McKenzie	Burial 13 June 1928 (34)	Church of England	G, 20
25	John West	30 Oct 1917 (44)	Church of England	N, 19
26	Eileen Constance Grieves	18 May 1936 (36)	Church of England	U, 9
27	Frank Halladay	30 July 1922 (58)	Church of England	C, 7
28	Hope Eula Knight	12 Nov 1923 (54)	Church of England	E, 7
29	Joshua A Malcolm	24 June 1924 (35)	Church of England	F, 8
30	Arnold Montague Stone	31 Dec 1923 (52)	Church of England	E, 15
31	Beatrice Mary Joan Ogden	13 July 1924 (27)	Church of England	F, 17
32	Lewis Alfred Gill	12 Jan 1927 (49)	Church of England	J, 14
33	Walter Herbert Knudson	20 May 1928 (31)	Church of England	L, 2
34	Haptwig Wellau	15 Apr 1929 (57)	Lutheran	M, 9
35	Peter Hansen	9 Aug 1917 (50)	Church of England	N, 1
36	Robert Pasmore	30 June 1909 (27)	Church of England	A, 2
37	Reginald Frederick Anson	27 Sep 1919 (29)	Church of England	R, 9
38	Robert Hughes	7 April 1919 (29)	Church of England	Q, 12
39	Alfred Ernest Tilley	Burial 29 Apr 1919 (35)	Church of England	R, 10

No.	Name	Death Date (age)	Section	Row, Grave
40	Vincent Arena	4 Feb 1926 (16)	Roman Catholic	H, 27
41	Christmas (Chrissie) Marguerite Hunter	Burial 1 June 1921 (28)	Roman Catholic	A, 20
42	Georges Alexandre Dorion	21 April 1917 (32)	Roman Catholic	L, 24
43	Margaret France	30 Aug 1918 (43)	Presbyterian	J, 5
44	Robert Scrimgeour	Burial 19 Mar 1915 (52)	Presbyterian	E, 9
45	Robert W Graham	28 July 1910 (39)	Presbyterian	A, 11
46.	Eliza Jane Chinnery	1 Feb 1916 (40)	Church of England	K, 46
47	Bernard Stanley Grosvenor	Burial 26 May 1915 (40)	Roman Catholic	I, 11
48	Margaret Jane Poland	Burial 19 Aug 1927 (52)	Roman Catholic	K, 2
49	John McDonald (Trooper)	27 Aug 1924 (37)	Presbyterian	N, 6
50	Dorothy L Sydenham	25 April 1916 (30)	Church of England	L, 11
51	Ada Alice Campbell	31 Dec 1916 (17)	Salvation Army (Presb Cem)	G, 11
52	Agnes Lindsay	5 Nov 1924 (40)	Roman Catholic	F, 20
53	William Buckley	Burial 2 Nov 1914 (44)	Roman Catholic	H, 32
54	Elizabeth (Eliza) Ann Murray	5 June 1925 (26)	Church of England	H, 6

** P. J. V. Hanlon was found to have two graves within the Cemetery. Research has indicated that a 2nd grave was added to the site (matching the original almost exactly) in 1996, after the original was unable to be located. Council staff identified the duplicate grave in 2012 and reported the matter to the Department of Veteran's Affairs in 2013. The duplicate grave has subsequently had its plaque removed, though the concrete plinth remains in place (in the wrong location).*

*** Edmund Curry's headstone provides a death date of 29 Feb 1939, though the burial register indicates a burial date of 1 Feb 1939 which makes a date of 29 Jan 1939 likely. It is unclear which is accurate.*

****Grave identifies as being for Bill and John Christie but no Bill Christie appears on the burial register. It is possible he was buried with his brother later?*

PHOTOGRAPHIC INDEX

The photographic index of identified graves is provided below. A single image is provided for most graves, though a number have two images to show a more detailed shot of the inscription, with a broader shot of the grave.

1. P. J. V. HANLON MILITARY GRAVE (ORIGINAL)



2. P. J. V. HANLON MILITARY GRAVE (DUPLICATE)



**See note on burial table for explanation of duplication.*

3. JOSEPH TAYLOR



4. EDMUND CURRY



5. FRANCIS VINCENT MCCARTHY



6. THOMAS GOODMAN



7. ALICE DELANEY



8. MARGARET COLEMAN



9. MARY GREENTREE



10. BILL AND JOHN CHRISTIE



11. HORRACE JAMES WILSON



12. ALEX RAEBURN AITKEN



13. HARRY HANDCOCK



14. ARTHUR H DWYER



15. WILLIAM EDWARD FRANK VAUGHN



16. HORATIO HENRY BAKER



17. THOMAS WELLWOOD



18. PETER CLARK



19. ERNEST MONTAGUE CLARK



20. MARTHA MAY HAWKE



21. NELLIE ARMSON



22. AMY URQUHART PATON



23. GERTRUDE MAUD FELINE



24. BRENDA MCKENZIE



25. JOHN WEST



26. EILEEN CONSTANCE GRIEVES



27. FRANK HALLADAY



28. HOPE EULA KNIGHT



29. JOSHUA A MALCOLM



30. ARNOLD MONTAGUE STONE



31. BEATRICE MARY JOAN OGDEN



32. LEWIS ALFRED GILL



33. WALTER HERBERT KNUDSON



34. HAPTWIG WELLAU



35. PETER HANSEN



36. ROBERT PASMORE



37. REGINALD FREDERICK ANSON



38. ROBERT HUGHES



39. ALFRED ERNEST TILLEY



40. VINCENT ARENA



41. CHRISSIE M HUNTER



42. GEORGES ALEXANDRE DORION



43. MARGARET FRANCE



44. ROBERT SCRIMGEOUR



45. ROBERT GRAHAM



46. ELIZA JANE CHINNERY



47. BERNARD STANLEY GROSVENOR



48. MARGARET JANE POLAND



49. JOHN MCDONALD



50. DOROTHY L SYDENHAM



51. ADA ALICE CAMPBELL



52. AGNES LINDSAY



53. WILLIAM BUCKLEY



54. ELIZABETH (ELIZA) ANN MURRAY



Waterfall General (Garrawarra) Cemetery

Summary of Submissions

Community submissions

#	Family Name	Connection to site	Comments on future management
1	Kuur	Father buried in cemetery	No comment on future of cemetery, would like to be kept informed.
2	Grinly	Relative buried in cemetery	Should be thoroughly cleared and managed as bush cemetery. Signage should be erected. Access needs to be easier possibly through Garrawarra Hospital and opened to relatives and interested persons at least 3-4 times a year.
3	Bray	Editor of Family History Journal	Current condition startling but understandable. Hopes Council will take steps to preserve in future.
4	Beazley	Interested community member	Should restore site to honour the forgotten – two thousand graves are a large number of people who should not be overlooked anymore. Could be a tourist venture – preserve important history (similar to Quarantine Station at Manly).
5	Watson	Interested community member	Given bushland beauty, peaceful atmosphere and lack of vandalism Garrawarra deceased should be left in peace as is with ongoing heritage protection. Should construct a memorial wall with all names to honour the deceased. Could be located close to old Princes Hwy near Garrawarra Hospital rather than visitors disturbing graves.
6	Helensburgh Landcare Group	Local Landcare group	Strong support for State heritage listing (combined listing with former Sanatorium) and protection of cemetery. State Government should manage site – it was their responsibility in the past. Landcare has long term interest in area. Support establishing the area (Cemetery and surrounding bushland) as an Environment and Heritage Protection Area as medium-long term goal. In meantime, support management of cemetery as bush cemetery by Wollongong Council. Reject a no maintenance approach as eventually all surviving headstones will be consumed by nature. Support removal of debris and protection of headstones and graves from vegetation as soon as possible. Access difficult, favour minimal pedestrian access only on select open days. Expenditure on roads and parking likely unjustifiable based on limited number of expected visitors per annum. Urge Council to make historical details and stories available on web and installation of interpretative feature at entrance, ideally with names of those buried. Believe 'Friends of Cemetery' Group is desirable and worth a try but expect will quickly fade away – formalised management is better solution.
7	Hurry	Assisting in documenting history of	Wollongong Council most appropriate manager.

#	Family Name	Connection to site	Comments on future management
		cemetery and people buried there	Support bush cemetery option. Support open days for public access to cemetery. Cannot afford to lose this history. Undergrowth and debris should be cleared. Need to allow relatives limited access to site. At least one open day a year and small service. Council could gain access through obtaining key from Hospital to avoid having to provide alternate road access. Support State Heritage Listing and consolidation of listings for Cemetery and former Sanatorium. If funding found, a memorial wall should be provided – close to administrative centre of Garrawarra to prevent vandalism.
8	Kelly	Aunt buried in cemetery	Council most appropriate managers. Support minimal intervention. Cost of restoring likely to be prohibitive, would be wonderful interested to be able to access on open days. Should produce a memory book, publication or website to commemorate the people buried at the cemetery.
9	Anglican Church Diocese of Sydney	Anglican Church – Wollongong Region	Work done so far very impressive. Supportive of proposal to manage and preserve history of cemetery. Would like to be kept informed.
10	Papalia	Relative buried at cemetery	Commendations for recognising the ‘forgotten’ at the Waterfall Cemetery. Site and responsibility of management should not be relinquished to State Government – disrespectful to the dead. The Site should be cleared and surveyed for the purposes of identifying and marking gravesites. Graves should be marked with plaques. If not possible monument should be erected with names of deceased. Site should be maintained as lawn cemetery and costs borne by State Government.
11	Byrnes	Interested community member	Asks how long Council had control of cemetery without realising its management responsibilities.
12	Gorst	Grandfather buried at cemetery	Congratulate Council on engagement. Although financial impost, prefer Council manage site. May fall through cracks if handed to State. Bush cemetery best capture social and cultural significance of site – part of significance is that it has lain dormant for ~ 65 years. Access through Garrawarra Centre with small unobtrusive car park preferred. If members of public access as individuals less of environmental impact than large group at once. Most people will go for reflection or research. Not opposed to open days/guided walks. Support SP2 Special Uses Cemetery zone for site – seems obvious.

#	Family Name	Connection to site	Comments on future management
			Logical to combine two sites into one heritage listing – when applying for grants better to view the area as single entity. Support State Heritage listing.
13	Knowles	Interested community member	2 submissions. Council should accept responsibility for restoration and maintenance. Financial assistance should also come from State Department of Health, Heritage Council, Churches and Federal Department of Veteran Affairs. Access should be provided.
14	Mawhinney	Employee Garrawarra Centre	Group interested in helping clean up and maintain cemetery.
15	Wiffen	Employee of Garrawarra Centre	Started work at Garrawarra in 1970 – not a facility caring for TB sufferers for many years by then but still practices and reminders of its past. Provides details of working at Garrawarra Centre and brochure detailing history.
16	Faraone	Great Grandmother buried in cemetery	Provides history and information about family member buried in cemetery. Would like to take active role in conserving cemetery. Extremely important to family. Previous neglect leaves little hope for full restoration. Best possible outcome is access for relatives, and cemetery remain a bush cemetery with minimal clearing – however needs safe access point. Need a place for relatives to sit, and place for flowers, possibly a plaque with names of all deceased. Infuriated that unable to visit the cemetery. Is funding the only setback? Willing to assist in pursuing funding sources.
17	Blair	Vice President Hurstville Family Society Mother's cousin died at Sanatorium – buried in Woronora Cemetery	Would be nice to have memory of those who died of TB – if site were cleared and made accessible to public many historians and family members would be happy.
18	Herben	Historian	Nationally significant site only cemetery in NSW (possibly Australia) purposefully created for the burial of victims of TB. Importance of such a large number of burials - people who all died of same disease very rare in young country such as Australia. Waterfall more important to families as victims had been separated and isolated from loved ones. Inaccessibility of site protects it from unfavourable interference. Speaking to families and relatives and historians this is a very important site. Council must clear site of dead fallen and rotten timbers for health and safety and legal reasons. Bushcare group could then take over care of site. Families could pay for plinths and plaques on graves. Council could hold annual memorial services – on the roadway near the cemetery and allow family members to place flowers on relatives' graves. Recommend cemetery be listed as a state, national and

#	Family Name	Connection to site	Comments on future management
			internationally significant site.
19	Helensburgh Historical Society Inc	Local Historical Society	Cemetery is unique needs preservation. Either State or Council preserve the cemetery and afford it high heritage protection – support State heritage listing as soon as possible and amalgamation of listings. Relatives need to be able to the access the site, either the grave sites or a memorial in the cemetery. Future custodianship and management needs to be worked out before we can comment further. Future zoning must give amount of flexibility to be able to manage site. Council's management of this issue could set important precedent for other historical cemeteries.
20	Page	Grandfather buried in cemetery	Provides brief family history and story of grandfather. Family retraced grandparents footsteps a couple of years ago and tried to get as close to cemetery as possible, but very overgrown.
21	Favelle	Relative buried in cemetery	Would like Council to retain care and control of cemetery.
22	Eaton	Uncle buried in cemetery	Provided some family history. Thanks Council - treatment of subject very sensitive. Look forward to more developments.
23	Muggeridge	Relative buried in cemetery	Responsibility should be shared by Commonwealth, State and Local Government to work together for funding. Support heritage listing – site of great importance. Area needs to be cleared of all dead timber, mulched and grasses planted. It is a sacred place. Support a memorial wall with names of persons buried inscribed. Access four times a year for Council to administer.
24	Slough	Grandfather buried in cemetery	Congratulate all who compiled documentary – very thoughtful. Would be remarkable if cemetery could be conserved so relatives can visit. If not economically viable then perhaps a memorial wall. With more publicity, more interest in the site would be generated. Support Wollongong Council as manager of site and establishment of bush cemetery with access on open days. Could be an open space lawn area with seating and a few native plants in a garden where perhaps a wall listing all the names of the 2,000 people buried there could be placed. Alternatively a metal plaque could be bought by relatives and friends of each person in the cemetery and individually placed on a few very large rocks put there for that specific purpose.
25	Davidson	Member Central Coast Historical Society	Site of great significance because of genealogy, historic TB/disease treatments and to descendants of relatives buried there. Tried to visit but disappointed at lack of access. Restoration should involve: securing of present headstones. Keep as much bush setting as possible, with walkways and quiet reflection space (seats); Identify burial sites with

#	Family Name	Connection to site	Comments on future management
			cemetery plan. Wall of remembrance erected – families can contribute to cost of plaques, publish book DVD about stories of those interred. Council should retain care and control. Support bush cemetery and informal vehicular access.
26	Bool nee Muggeridge	Aunt buried in cemetery	No maintenance since 1949. State should help access and conservation as a bush cemetery.
27	Bryant	Grandmother buried in cemetery	Provided a little information regarding grandmother. Looking forward to hearing of progress.
28	Nicholson	Grandfather buried in cemetery	Provided details about grandfather. Family came down from Newcastle about 12 years ago to cemetery – couldn't find gravesite due to overgrowth which was disappointing. Movie is extremely moving and shows family members are not forgotten. Wollongong Council most appropriate manager of site. Supports bush cemetery option with open pedestrian access.
29	Donohoe	Interested community member	Met 3 sisters from UK who came to Australia to trace their Grandfather who died at Garrawarra. No access to cemetery but they wanted to visit anyway. Very emotional time. Families need closure and opportunity to visit their relative's burial sites.
30	Hale	Interested community member	Searching for information on possible burial at cemetery.
31	O'Brien	Interested community member	Requesting information on cemetery.
32	Jackson	Historian & descendant of former patient at Sanatorium	Tried to find where great aunt is buried but locating cemetery was impossible. Would like possibility of erecting headstone for relative if one is not already there. Or a monument with all names of people buried could be placed at cemetery and history of site should also be provided at the entry point. Would love to attend a rededication ceremony (as would family). Could become an annual event. Ancestry tourism is growing and site should be preserved. Hopefully will be State Heritage listed.
33	Curcio	Interested community member	Wollongong Council is most appropriate manager of site. Would like to see Cemetery restored. Support establishment of a bush cemetery with formalised access (road and parking). WCC has already failed the souls buried there by leaving them abandoned there. People don't go to places of any historic significance if they can't gain access to it. Great place to regain a piece of Wollongong's history.
34	Ross	Grandfather mentioned in documentary	Supports State Government management of site and establishment of a bush cemetery with formalised vehicular access. Interested in more information about the cemetery.

#	Family Name	Connection to site	Comments on future management
35	Whittall	Interested community member	Supports Wollongong Council as manager for site. Supports establishment of bush cemetery with informal access. Believes it is important to maintain a burial site for future generations. Believes it is heartless to let it go uncared for, as these are someone's family members.
36	Historical encounters	History group	Support Wollongong Council as most appropriate manager of site. Support bush cemetery option with access on open days.
37	Stapleton	Interested community member	Wollongong Council most appropriate manager. Support bush cemetery option with formalised access.
38	Daley	Interested community member	Wollongong Council most appropriate manager. Support establishment of bush cemetery with open pedestrian access.
39	Lloyd	Great-grandmother buried in cemetery	Wollongong Council most appropriate manager. Support establishment of bush cemetery with open pedestrian access. Wollongong City Council should be applauded for the manner in which it has responded to this issue. The short film is wonderful. Later submission states that site should be allowed to revert back to bushland, and people remembered through memorial sculpture or the like.
40	Beaumont	Interested community member	Support management by Wollongong Council. Support a formalised bush cemetery; it would be good for access not just by vehicle, but pathway for walkers or cycles from the Waterfall Railway. Further is it possible to raise funds by increasing the area and selling off more plots, particularly to those of us who reside in Waterfall and have for some time?
41	Goddard	Great-grandfather buried in cemetery	Support Wollongong Council as manager, and establishment of bush cemetery with informal vehicular access.
42	Charlton	Interested community member	Support Wollongong Council as manager, and establishment of bush cemetery with open pedestrian access. This site should be conserved for medico-historical reasons.
43	House	Interested community member	State Government is most appropriate manager. Don't agree that there is any special historical importance to this Cemetery. It is not a cemetery containing the remains of pioneers or even a majority of local residents. Any history resides in the adjoining buildings and the disease of tuberculosis. Public money and resources can be much better spent on facilities for the living. If any living family members wish to restore a grave or monument then they could be permitted to do so at their own expense. Legislation permits that 50 years after the last burial a cemetery can be turned into a park or similar. What better park is there than natural bushland where the dead can be left in peace?
44	Ford	Consultant Archaeologist	Support Wollongong Council as manager. Support establishment of bush cemetery and access on open days.

#	Family Name	Connection to site	Comments on future management
45	Briscoe-Hough	Manager of local community organisation	Interested in establishing a bush cemetery or natural burial ground in the Wollongong LGA. If space available, could be viable option to use space at Garrawarra as bush cemetery. Creating a Bush/ Natural burial ground would be one way of ensuring this cemetery would be looked after into the future and become a vibrant memorial to those who are buried there now and into the future. Support Wollongong Council as manager, and bush cemetery with informal access.
46	Colville	National Trust Cemeteries Officer (NSW)	Support Wollongong Council as manager of site with minimal intervention and access on select open days. The National Trust (NSW) has information on Friends of Cemeteries Groups and how to establish them if Council would like some assistance in this regard.
47	Turner	Interested community member	This is an important issue, even in light of pressing financial concerns. Believe that working with community undertakings may take a significant burden off of Council's fiscal responsibilities.
48	Heather	Great grandfather buried in cemetery	Great grandfather – from Sweden buried in cemetery.
49	Hindmarsh	Father treated at former Waterfall Hospital	Site should be cleaned up and not forgotten.
50	Geftakis	Uncle buried in cemetery	Would love to be able to visit site and install a plaque or headstone for his uncle. Supports Council in this project and supports the idea of open days.

- Note: Submitters who have not declared a family connection to the site have been labelled as 'Interested community member', this does not necessarily mean they do not have a personal connection to the site, only that such a connection was not declared in their submission.

Government Authority submissions

#	Authority	Comments on future management
1	NSW Ministry of Health	Recent literature review states organisms that cause TB and cholera are unlikely to survive long in human remains. If not going to disturb burial sites and staff wear appropriate personal protective equipment then there should be low hazard. Council operates cemeteries so valuable resource with staff that have relevant skills and experience. Only general advice. More specific advice may be required for developing future plans of management etc.
2	Crown Lands Division	Crown Lands would be pleased to work with Council with the view to formalising access to Lot 4 DP 840501. Support Council as ongoing manager of the site. Most practical access other than through the hospital grounds is via an existing track that mainly follows a closed Crown Road. This closed road could in theory be transferred to Council as Crown land subject to creation of easements. However, track may deviate onto Sydney Catchment Authority Land. Other alternatives may be possible.
3	Office of War Graves, Department of Veteran's Affairs	Any future management of the site will enable the Office of War Graves to visit the site and carry out annual maintenance of the grave for J.P.V Hanlon.