



Contact: Claudine Loffi  
Phone: 02 9873 8590  
Fax: 02 9873 8599  
Email: [claudine.loffi@heritage.nsw.gov.au](mailto:claudine.loffi@heritage.nsw.gov.au)  
Our ref: A1146776  
File number: 12/16345  
Your ref:SSD 5029, 11/2117

Mr Cameron Sargent  
A/Director, Metropolitan and Regional Projects North  
23-33 Bridge Street  
Sydney NSW 2000  
Attention: Megan Fu  
c/o [megan.fu@planning.nsw.gov.au](mailto:megan.fu@planning.nsw.gov.au)

Dear Mr Sargent

**Re: State Significant Development proposal – St George Hospital – New Emergency Department – Demolition of ‘Griffith House’– SSD 5029**

I refer to your letter dated 5 October 2012, received by the Heritage Branch on 8 October 2012, seeking Heritage Branch comments regarding the above development proposal and specifically the proposed demolition of the local heritage item known as Griffith House.

The delegate of the Heritage Council has briefly reviewed the exhibited Heritage Impact Statement prepared by Urbis dated June 2012 and accordingly provides the following comments regarding heritage issues.

It is noted that Griffith House is listed as a heritage item of local heritage significance on the Kogarah Local Environmental Plan 1998 and that this building represents an 1890s Victorian Italianate villa. The exhibited heritage assessment does not highlight potential state (or a high level) of heritage significance for this item or potential archaeological relics of local or state heritage significance. Therefore, these are not matters for assessment by the Heritage Council under the Heritage Act 1977.

These matters of local heritage significance are managed under the Environmental Planning and Assessment Act 1979 and its instruments administered by the local council, the Department of Planning and Infrastructure or state government agency (Part 5). The following comments are provided to assist the Department of Planning and Infrastructure in this regard:

- The Heritage Council supports the conservation of local heritage and accepts that the community has a reasonable expectation for places listed as heritage items under local planning instruments to be retained and managed accordingly.
- While the local planning controls for heritage items do not apply to state significant development, before considering over-riding expectations established by these controls, the Heritage Council encourages the Department to manage this decision according to best practice and measured against the intent of these local heritage provisions.



- The exhibited statement of heritage impact does not appear to comply with the Heritage Council's best practice standards for assessing significance, statements of heritage impact and the Heritage Act's standards for management of state-owned heritage items. Some omissions include:
  - The standard statement of heritage impact questions relating to demolition of a building are not answered in section 5.3 'Heritage Office guidelines' to demonstrate no reasonable alternatives to demolition
  - No reasons are provided to support the exclusion of the social significance of this item to the community
  - The significance of the item and its components have not been graded to support the report's conclusions about the integrity of the item
  - No reference or assessment is made against the requirements for managing state-owned heritage assets under sections 170 and 170A of the Heritage Act.
- The Heritage Council understands that the merits of the demolition, in terms of its impacts on the heritage significance of the item under the local heritage provisions, have not been assessed in the local council's submission.
- For these reasons, the Heritage Council recommends that the Department of Planning and Infrastructure refer this matter to an independent heritage consultant to assess the significance of the item and the justification for the item's removal on heritage grounds with reference to the local planning controls, the requirements of Sections 170 and 170A of the Heritage Act for state-owned heritage assets, and in accordance with the Heritage Council standards for assessing heritage significance and statements of heritage impact.
- An expert independent review can help verify whether demolition of this heritage items is justified on heritage grounds in terms of the item's heritage significance, capacity for conservation, and an examination of alternatives to demolition.

For enquiries regarding this matter, please contact Claudine Loffi at the Heritage Branch on (02) 9873 8590.

Yours sincerely

15/10/2012

**Vincent Sicari**  
Manager Conservation Team  
Heritage Branch  
Office of Environment and Heritage  
**As Delegate of the Heritage Council of NSW**