

19 June 2013

Director-General
Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Sir,

**Re: MP07_0070 Wollongong Private Hospital
Section 75W Modification Application
Heritage Impacts**

The Planning Assessment Commission of New South Wales determined this project application by approval on 18 April 2011. That determination was informed by our office's April 2010 *Statement of Heritage Impact* included in the Environmental Assessment of that application (attached). This advice reviews the heritage impacts of the proposed modification of the Wollongong Private Hospital project.

The modified design is documented on the drawings by Health Projects International set out below:

Document Name	Issue	Issue Date
• WGPB-VA-8-75W	1	11/6/2013
• WGPB-VA-7-75W	1	11/6/2013
• WGPB-VA-6-75W	1	11/6/2013
• WGPB-VA-5-75W	1	11/6/2013
• WGPB-VA-4-75W	1	11/6/2013
• WGPB-VA-3-75W	1	11/6/2013
• WGPB-VA-2-75W	1	11/6/2013
• WGPB-VA-1-75W	1	11/6/2013
• WGPB-SIG-3 -75W	1	6/6/2013

• WGPB-SIG-2-75W	1	4/6/2013
• WGPB-SIG-1-75W	1	4/6/2013
• WGPB-SE-2-75W	3	18/6/2013
• WGPB-SE-1-75W	3	18/6/2013
• WGPB-SD-1-75W	1	31/5/2013
• WGPB-REN-4-75W	1	7/6/2013
• WGPB-REN-3-75W	2	18/6/2013
• WGPB-REN-2-75W	1	7/6/2013
• WGPB-REN-1-75W	2	7/6/2013
• WGPB-P-S-75W	2	7/6/2013
• WGPB-P-G-75W	5	18/6/2013
• WGPB-P-B3-75W	4	18/6/2013
• WGPB-P-B2-75W	4	18/6/2013
• WGPB-P-B1-75W	4	18/6/2013
• WGPB-P-8-75W	1	7/6/2013
• WGPB-P-7-75W	2	18/6/2013
• WGPB-P-6-75W	2	18/6/2013
• WGPB-P-5-75W	2	18/6/2013
• WGPB-P-4-75W	1	7/6/2013
• WGPB-P-3-75W	1	7/6/2013
• WGPB-P-2-75W	2	6/6/2013
• WGPB-P-1-75W	3	18/6/2013
• WGPB-EC-5-75W	2	6/6/2013
• WGPB-EC-4-75W	2	6/6/2013
• WGPB-EC-3-75W	2	6/6/2013

• WGPB-EC-2-75W	1	31/5/2013
• WGPB-EC-1-75W	1	31/5/2013
• WGPB-E-2-75W	2	7/6/2013
• WGPB-E-1-75W	3	7/6/2013

The design modifications relate to reorganisation of the internal functions of the hospital use and the external form of the building while maintaining the general envelope of the current approval.

We note that the buildings on the subject site have been demolished and so views to and from the adjoining heritage item over the site have been revealed that could not be seen at the time of the original project proposal.

The Wollongong Development Control Plan 2009's Chapter E11 section 14.2 clause 3 provides that: *'Development in the vicinity of a heritage item should give strong regard to any significant views to and from the heritage item or heritage conservation area and any public domain area.'*

As in our 2010 report (attached), the only real impact is on the heritage item immediately adjoining item at 366 Crown Street. Page 11's figure 3 shows the visual catchment of the heritage item at the time. We reported that:

"The impact of the new development has been minimised by stepping down the bulk of the building towards the interface with the adjacent heritage item and providing an open undercroft and principal entrance at the southwestern corner of the site allowing parts of lost views to and from the southeastern verandah of the building to be recovered." (page 14)

We also reported on page 14 that *'the project would reinforce the association of 'Hospital Hill' with hospital use and allied health uses'.*

The building as now proposed does not step down towards the heritage item and the statement that parts of lost views to and from the verandah of the heritage item would be recovered no longer holds true. The modification can then be seen to have a greater (though still minor) adverse heritage impact than the approved scheme. Views from the verandah are retained by the southwest corner setback to some degree.

Conclusion

Both the approved project and the project as modified would have the beneficial heritage impact of reinforcing the association of 'Hospital Hill' with hospital use and allied health uses.

In assessing the heritage impact upon the item at 366 Crown Street, the relatively low level of significance of this former house should be borne in mind. Although the modified proposal does not accommodate the retention and recovery of views to and from the adjacent heritage item to the same degree as the approved project, the impacts on the setting of what is quite a modest heritage item remain acceptable.

Wollongong City Council's submission of 26 August 2010 on the original project application, set out a number of concerns with the heritage impacts of the development and included a heritage assessment of the now-demolished 'Cram House' on the project site itself. Its ultimate recommendation was that any consent be conditioned to require:

- The installation of an interpretive panel within the foyer (or another appropriate area of the hospital) providing a brief history of the site and the details of the donation of the site for use as a health care facility, as well as the continued evolution of this history into the currently proposed development; and,
- That consideration be given to the naming of the hospital, a ward, or other onsite facility in honour of the Cram Family, or more particularly, Martha Ann Cram.

The former recommendation was integrated into condition E2 of the approval to be achieved prior to occupation certificate/prior to operations.

We confirm that any approval for modification of the project should maintain the current condition E2 in relation to 'heritage interpretation' on the site.

Please contact either myself or Don Wallace on (02) 9922 2344 if you would any clarification.

Yours faithfully,
NBRS+PARTNERS

A handwritten signature in black ink that reads "Robert Staas". The signature is written in a cursive, slightly stylized font.

Robert Staas
Director – Heritage Consultant

ATTACHMENT ONE: REVISED HERITAGE IMPACT ASSESSMENT

The following assessment is based on the guidelines set out by the NSW Heritage Office publication 'Statements of Heritage Impact', 2002.

The following aspects of the proposal respect or enhance the heritage significance of the item or conservation area for the following reasons:

- The project would reinforce the association of 'Hospital Hill' with hospital use and allied health uses.

There are no aspects which could further significantly and detrimentally impact on the limited heritage significance of the adjacent item. The difference in scale relationship is one that results from planning approvals and is not capable of being modified in any substantial way. The physical separation created at ground level provides some visual relief to the setting of the heritage item.

1.1 New development adjacent to a heritage item (including additional buildings and dual occupancies)

- *How is the impact of the new development on the heritage significance of the item or area to be minimised?*

The impact of the new development on the setting of the item is reduced by setting the new building back from the boundary.

- *Why is the new development required to be adjacent to a heritage item?*

The new development is on a separate parcel of land under different historical and current ownership from the heritage item. The new development seeks to optimise the use of the land as a private hospital in an area known as 'Hospital Hill'. Project approval for an 8 storey hospital exists for the site and the current modification application is located substantially within the envelope of that approval.

- *How does the curtilage allowed around the heritage item contribute to the retention of its heritage significance?*

The curtilage around the heritage item – 366 Crown Street – is the lot curtilage and is also historic curtilage of the place. Part of the views to and from the south-eastern verandah of the heritage item to Crown Street at the southeast which had been closed by an existing building of intrusive character would be restored.

- *How does the new development affect views to, and from, the heritage item? What has been done to minimise negative effects?*

As set out above, views from the southeast will be partly retained. The view from the western approach along Crown Street will be altered from the intrusive two storey building which had existed to an eight storey backdrop building that has similarities with recent development at the nearby Wollongong Public Hospital.

- *Is the development sited on any known, or potentially significant archaeological deposits? If so, have alternative sites been considered? Why were they rejected?*

No evidence has been found to indicate that the development site is likely to retain relics of local or State significance. At the time of the project application, the site contained structures from the early twentieth century to the late twentieth century but these have since been demolished.

- *Is the new development sympathetic to the heritage item? In what way (eg form, siting, proportions, design)?*

The new development is sited such that it retains parts of the views to and from the south-eastern verandah of the adjacent heritage item.

- *Will the additions visually dominate the heritage item? How has this been minimised?*

The eight storey building is adjacent to the single storey heritage item at 366 Crown Street. It goes without saying that most eight storey buildings which optimise development on their sites in close proximity to immediately adjacent single storey structures will tend to dominate those single storey structures. In this instance, the designer has intended to minimise the impact by:

- Retaining a view from the principal entrance undercroft through a seven metre wide open structural bay to the rear of the heritage item; and,
 - Providing a backdrop to the heritage item when viewed from the west.
- *Will the public and users of the item, still be able to view and appreciate its significance?*

The development site is currently vacant. The increased activity brought by the hospital facility described in the project application means that a greater number of people will be able to become aware of the heritage item at 366 Crown Street, Wollongong and this could be augmented by heritage interpretation to explain the significance of the site and the context of the adjacent heritage building. Condition E2 of the existing approval provides for heritage interpretation. This condition should be maintained in any modified approval.

1.2 Wollongong Development Control Plan 2009 Provisions for 'Development in the Vicinity of a Heritage Site'

Development Controls (Section 14.2)	The Proposal
(a) The character, siting, bulk, scale, height and external appearance of the development;	The impact of the new development has been minimised by allowing parts of lost views to and from the southeastern verandah of the heritage item to be recovered. Refer above.
(b) The visual relationship between the proposed development and the heritage item or heritage conservation area;	The visual relationship has been augmented by retaining part of a view from the south-eastern verandah of the heritage item to Crown Street at the southeast which had been closed by a now-demolished building of intrusive character. Refer above.
(c) The potential for overshadowing of the adjoining heritage item or any building within a heritage conservation area;	The heritage item is located immediately to the west and will be overshadowed in the morning but not after noon.
(d) The colours and textures of materials proposed to be used in the development;	The building is clad in fibre cement sheet cladding and glass. The substantial new hospital building is readily identifiable as an introduced element. It should be recognised that the white painted heritage item was not originally painted and that it would not be appropriate to echo it in new developments.
(e) The landscaping and fencing of the proposed development;	Screen planting would be provided along the boundary with the heritage item to provide a low scale backdrop from the western approach to the heritage item.
(f) The location of car parking spaces and access ways into the development;	Most parking is located beneath ground in basements.
(g) The impact of any proposed advertising signs or structures;	Signage on the Project Application drawings is limited to high level building naming on the Crown Street and East elevations. It does not intrude into the visual catchment of the heritage item.
(h) the maintenance of the existing streetscape, where the particular streetscape has significance to the heritage site;	The streetscape has not been identified as a heritage streetscape. The character of the townscape of 'Hospital Hill' is dominated by the

	mixed character established by the Public Hospital.
(i) The impact the proposed use would have on the amenity of the heritage site; and	The use of the project site and the adjacent heritage item have discrete uses and use intensification of the project site will not directly affect use of the heritage item. The use of the heritage item is not the original use and is not a use which contributes to its heritage significance.
(j) The effect the construction phase will have on the well being of a heritage building.	Condition B8 of the current approval provides for dilapidation report on the heritage building to be carried out and measures to be taken to ensure the care of the fabric of the heritage building.

ATTACHMENT ONE: STATEMENT OF HERITAGE IMPACT, APRIL 2010