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By email: megan.fu@environment.nsw.gov.au

Dear Ms Fu

Response to Submission comments for Redevelopment of Greenwich Hospital (Concept) (SSD 8699)

Thank you for your referral dated 22 October 2019 inviting comments from the Heritage Council of NSW on the above State Significant Development (SSD) Response to Submissions for the redevelopment of Greenwich Hospital including: a new health care and allied health facilities, residential aged care and seniors housing in an integrated care campus including building envelopes, car parking and site access arrangements.

It is noted that the proposed State Significant Development affects the State Heritage Register item (SHR no. 00574) 'Pallister' located at 95 River Road, Greenwich. Pallister incorporates the late Victorian house known as Standish, which was built as a residence for John St Vincent Welch and his family in 1892 and is evidence of residential development and the suburbanisation of the Municipalities of Lane Cove, Willoughby and North Sydney. Standish is a rare example of a late Victorian Gentleman's residence within Greenwich.

Heritage NSW (former Heritage Division OEH) provided comment on the 19 March 2019 on the Environmental Impact Statement for this project where the following issues were noted:

- The concept proposal should be modified to remove the seniors living villas proposed to the south of the St Vincents Road access drive. Any seniors living villas within the curtilage are to be to the north of this access drive only. This modification would help retain the connection between Pallister and St Vincents Road, the landscaped setting of the historic villa, and reduce the visual impacts on the State significant heritage item.
- The concept proposal should be modified to reduce the adverse heritage impacts on Pallister through consideration of: a reduction in height of the hospital building and the western seniors living apartments; increased setbacks of these structures away from Pallister's north and north-west boundary; and transfer of the bulk of these buildings further away from Pallister (towards River Road). The increased setback is important to create a generous setting where a landscaped buffer zone can help screen the development and reduce negative visual impacts on views to Pallister.
- The proposed basement car parking is to be modified to be wholly outside the curtilage of Pallister to mitigate any potential adverse impacts on the structural integrity of the historic villa.
- A sympathetic landscape plan is to be developed by an appropriately qualified and experienced landscape architect with expertise in historic gardens and landscapes. The plan is to be informed by research into the historic landscape of Pallister, including pathways, fencing and vegetation. Further detail is to be provided on how the proposed formal parking and landscaped setting of the area surrounding Pallister is to be detailed

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- to respect - and where possible reintroduce - the historical landscaped setting and character of Pallister. All efforts should be made to screen the hospital and other buildings from Pallister.
- An interpretation plan must be prepared in accordance with the NSW Heritage Division publication *Interpreting Heritage Places and Items Guidelines*, and the approved plan implemented prior to the issue of an occupation certificate.
 - Historical Archaeology: The proposed approach to conduct early archaeological testing to understand the archaeological research potential, management in terms of amended design recommendations and to inform the interpretation of Pallister is supported. To assist this the following requirements are recommended:
 - An Excavation Director must be nominated to manage the historical archaeological excavation program. This nominated person must demonstrate they are able to meet the *Heritage Council of NSW's Excavation Director Criteria* for locally significant sites.
 - An archaeological excavation methodology and research design, to establish the approach of the archaeological excavation, must be written prior to the start of any excavation works and be prepared for approval by the Heritage Council of NSW or its delegate.
 - The applicant and Excavation Director must ensure the results of the archaeological program are written up in a final excavation report outlining opportunities for conservation *in situ* (as a preference) according to significance, development & interpretation. This final archaeological report must be submitted to the Heritage Council of NSW and the local Council library within 12 months of the completion of the archaeological excavation. The proponent shall be required to nominate a repository for the relics salvaged from any historical archaeological excavations including details of their ongoing management and conservation.

It is noted that following comments on the EIS, Heritage NSW assessment staff also attended site for a meeting in July 2019 with the applicant and their Heritage Consultants to discuss the issues outlined above.

Since that time the proposal has undergone significant modification to attempt to address issues raised during the submission period, including those outlined above. Accordingly, the following comments are provided on the revised proposal presented in the Response to Submissions Report.

The following reports were considered in our assessment:

- Response to Submissions Report for SSD 8699 – Redevelopment of Greenwich Hospital Campus by Ethos Urban, dated 18 September 2019.
- Appendix A – Greenwich Hospital Redevelopment for Approval Drawings by Bickerton Masters.
- Appendix B - Response to Agency Submissions – Staged Redevelopment of Greenwich Hospital by Ethos Urban dated 24 September 2019;
- Appendix I - Letter report – Greenwich Hospital Redevelopment – Pallister House Summary of Changes and Heritage Commentary by NBR Architecture dated 10 September 2019; and
- Appendix L – 'Landscape Concept Proposal' by Taylor Brammer Landscape Architects dated 13 September 2019.

Built and Landscape Heritage:

- a) The Concept Proposal was modified to remove the seniors living villas proposed to the south of St Vincent's Road access drive. This retains the connection between Pallister and St Vincent's Road, the setting of the historic villa and reduces the impacts on the SHR listed site. This is considered appropriate.
- b) Any seniors living villas within the curtilage are to be north of the St Vincent's Road access drive. The amended proposal includes a Respite building in this location which is amply screened by trees and will not be readily viewed from this access drive. This is considered appropriate.
- c) While the concept proposal has not been modified to reduce the height of the hospital building and the western seniors living apartments as recommended to reduce the adverse heritage impacts on Pallister, they have been modified to reduce these impacts.

The western end of the hospital building has been reduced in scale (now partially single story) and is concealed beneath a landscape Terrace to improve site lines to Pallister House from River Road.

The lower section of the Hospital includes a 2-3 story podium intended to relate to the scale of Pallister House, partially reducing the impact of the floors above.

The design of the south side of the hospital has been amended to have a stronger relationship and visual connection to Pallister House and its heritage curtilage.

This is all considered appropriate.
- d) The plan has been modified to reconfigure the basement carpark to that it sits outside the curtilage of Pallister. This is considered appropriate.
- e) A landscape concept proposal (has been developed to ensure that the development does not impact on the significant landscape of Pallister, for example, the former bridle path will be interpreted as a pedestrian footpath running through the site. A period garden is also planned around Pallister House to contribute to its heritage curtilage.

The amended plans ensure that a large amount of mature vegetation contributing the immediate and wider setting of Pallister can be kept and incorporated into the proposed design. Where trees are removed, compensatory planting will be undertaken and will result in a net increase in trees. This is considered appropriate.
- f) An interpretation plan must be prepared for the site. The RTS report indicates that the applicant is happy to accept a condition of consent regarding this matter including the requirement to respond to the archaeological findings. That is considered appropriate.
- g) In addition, comments provided during the site visit by Heritage NSW staff outlined that the high-level link bridge between the Hospital and Respite Centre should be removed to minimise impacts on the heritage setting of Pallister. The link bridge still appears on several plans (e.g. Drawing S.02) but not on others in the Set of Approval Drawings (Appendix A). This bridge should be removed from all plans and drawings to the site to make it clear that its construction is not part of the proposed works.

Historical Archaeology:

The RTS advises the Heritage Council recommended approach to early test investigation in an area identified by GML as retaining locally significant archaeology is supported. The three recommended conditions of consent previously advised were supported in the RTS submission to manage the historical archaeological resources. To manage the archaeological program, Heritage NSW recommends three conditions (previously advised with minor revision), which are consistent with Heritage Council requirements for archaeological management.

Recommended Conditions of Consent:

If approved, the following conditions of consent are recommended for the proposal:

1. Setbacks from Pallister – The concept design should continue to be refined to ensure that the new buildings are setback as much as possible from Pallister’s north and north-west boundary and that a large landscaped area buffer zone is in place to help screen the development and reduce negative impacts to the primary and wider heritage setting of Pallister.
2. Nominated Heritage Consultant - A suitably qualified and experienced heritage consultant must be nominated for this project. The nominated heritage consultant must provide input into the detailed design (including on the form, detailing and materiality of the proposal), provide heritage information to be imparted to all tradespeople during site inductions, and oversee the works to minimise impacts to heritage values. The nominated heritage consultant must be involved in the selection of appropriate tradespersons and must be satisfied that all work has been carried out in accordance with the conditions of this consent.
3. Specialist Tradespersons - All work to, or affecting, significant fabric shall be carried out by suitably qualified tradespersons with practical experience in conservation and restoration of similar heritage structures, materials and construction methods.
4. Site Protection - Significant built and landscape elements are to be protected during site preparation and the works from potential damage. Protection systems must ensure significant fabric, including landscape elements, is not damaged or removed.
5. Schedule of Conservation Works - A schedule of conservation works is to be prepared for Pallister by a suitably qualified and experienced heritage consultant nominated for the project. The schedule is to specifically address urgent, medium and long-term conservation works which support the conservation of the building. The approved schedule is to be implemented as part of redevelopment of Greenwich Hospital.
6. Landscape Plan – The landscape concept plan is to be refined to provide specific detail on how the proposed formal parking and landscaped setting of the area surrounding Pallister is to be detailed to respect and reintroduce the historical landscaped setting and character of Pallister. All efforts should be made to screen the hospital and other buildings from Pallister.
7. Interpretation - An interpretation plan must be prepared in accordance with the NSW Heritage Division publication *Interpreting Heritage Places and Items Guidelines*, and the approved plan implemented prior to the issue of an occupation certificate. The interpretation plan must detail how information on the history and significance of Pallister will be provided for the public and make recommendations regarding signage and lighting. The plan must identify the types, locations, materials, colours, dimensions, fixings and text of interpretive devices that would be installed as part of this project, as well as a timeline for implementation of the interpretation. The plan should also incorporate the results of any archaeological investigative program undertaken for the Pallister site.
8. *Historical Archaeology (a)* – The Applicant shall nominate a suitably qualified and experienced historical archaeologist to manage the historical archaeological program according to the following conditions. This person must fulfil the Heritage Council’s Excavation Director Criteria (2019) for the excavation of locally significant archaeological sites.

9. *Historical Archaeology (b)* An Archaeological Research Design and Excavation Methodology shall be prepared to guide the archaeological program. It shall be prepared according to Heritage Council of NSW guidelines. This document shall be submitted for comments to the Heritage Council of NSW prior to approval by the Department of Planning Industry and Environment (DPIE).
10. *Historical Archaeology (c)* The Applicant must ensure the results of the archaeological program are written up in a final excavation report outlining opportunities and for conservation in situ (as a preference) according to significance, development and interpretation. The final archaeological excavation report shall be prepared within 12 months of the completion of archaeological excavation. It should include details of any significant artefacts recovered, where they are located and details of their ongoing management, conservation and protection in perpetuity by the land owner. Copies of the final excavation report shall be provided to the Department of Planning, Industry and Environment (DPIE), the Heritage Council of NSW and to the local Council's local studies unit.

If you have any questions regarding the above advice, please contact Katrina Stankowski, Senior Team Leader, Regional Heritage Assessments North, at Heritage NSW, on 9873 8569 or Katrina.stankowski@environment.nsw.gov.au.

Yours sincerely



Cheryl Brown
Manager, Northern Region
Heritage NSW
Department of Premier and Cabinet
As Delegate of the Heritage Council of NSW
15 November 2019