

10 July 2019

NSW Health Infrastructure  
c/o Kirrilee Drew  
PwC Australia  
One International Towers Sydney  
Waterman's Quay, Barangaroo, NSW, 2000

Dear Ms Drew,

## **STATEMENT OF HERITAGE IMPACT – SSD 10339 RANDWICK CAMPUS REDEVELOPMENT - INTEGRATED ACUTE SERVICES BUILDING ADDITION**

Advisian has been engaged by NSW Health Infrastructure (HI) to prepare a Statement of Heritage Impact (SoHI) to accompany an Environmental Impact Statement (EIS) for a State Significant Development Application (SSDA) pursuant to Part 4, Division 4.7 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) for the proposed Integrated Acute Services Building (IASB) Addition (the proposed development).

The proposed development comprises of the following core elements:

- University of New South Wales (UNSW) Eastern Expansion (Base Building Only).
- Associated modifications within the IASB.
- Lowering of Hospital Road.
- Landscaping.

The site, the subject of the proposed development, encompasses parts of: (A) the former rear yards of formerly Nos 35-45 Eurimbla Avenue; (B) a section of land of the Randwick Hospitals Campus (the Campus) forming a private road known as Hospital Road; and (C) land known as Delivery Drive (vehicle entry to an existing loading dock).

The SoHI has been prepared in response to dot point 1 of Item 8 of the Secretary's Environmental Assessment Requirements (SEARs) issued for SSD-10339, dated 26 June 2019 as follows "*Provide a statement of heritage impact to address the impacts of the proposal on the heritage significance of the site and adjacent areas*".

It is noted that specialist historical archaeologists Casey and Lowe were commissioned by Advisian to prepare a Historical Archaeology Assessment (HAA) to accompany the EIS. The HAA has been prepared in response to dot point 2 of Item 8 of the SEARs to "*Provide a historical archaeological assessment to address any archaeological potential and significance on the site and the impacts the development may have on this significance*".

The SoHI sets out:

1. The methodology for preparing the SoHI.
2. The background to the preparation of the SSDA.
3. A brief history of the development of the site.

4. The identification of any heritage item(s) and heritage conservation area(s) (HCAs) located within the site, the Campus or within the vicinity of the site.
5. Grading of significance of elements within the site and adjacent areas.
6. The relevant statutory and non-statutory conservation planning controls.
7. The assessment of the impacts, if any, of the proposed development on the conservation values that constitutes the heritage significance of any identified heritage item(s) and HCAs.

## 1 METHODOLOGY

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In preparing the SoHI, the following methodology was used:

- Review of relevant legislative, regulatory, State and Local statutory and non-statutory planning controls.
- Review of the NSW State Heritage Inventory for Items listed on the State Heritage Register, Section 170 Heritage and Conservation Registers and Schedule 5 Environmental Heritage to *Randwick Local Environmental Plan 2012* (the LEP) that may be on the site or in the vicinity of the site.
- Review of the Register of the National Estate and the Commonwealth Heritage List and National Heritage List under the *Environmental Protection and Biodiversity Conservation Act, 1999* (EPBC Act).
- Review of the Perumal Murphy (1989) and City Plan (2015) Heritage Studies.
- Consideration of the Prince of Wales Hospital Campus Randwick Conservation Management Plan (CMP), August 1997, prepared by Graham Brooks and Associates.
- Consideration of the HAA, July 2019, prepared by Casey and Lowe.
- Consideration of the EIS for SSD 9113 Randwick Hospitals Campus Redevelopment – Prince of Wales Hospital Expansion Stage 1, 21 August 2018, prepared by Advisian.
- Review of architectural drawings, prepared by BVN, July 2019.

## 2 BACKGROUND

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SSD 9113 for the construction and operation of the 13 level IASB to the immediate west of the Campus was approved by the Department of Planning and Environment on 27 February 2019. The IASB is Stage 1 of the multi-stage redevelopment program being delivered by HI for the Randwick Campus Redevelopment (the Project). The Project is an important component of the vision of the NSW Government and Randwick Health Collaboration's vision for the creation of the Randwick Health and Education Precinct.

The NSW Government is partnering with UNSW Sydney for this SSDA to strengthen the Campus through the integration of additional health education, training and research with acute healthcare services - directly benefiting patients, carers and the NSW community. Under the latest partnership initiative, an extension to the approved IASB is proposed to enable clinical innovation and research, biomedical engineering, and research laboratories to be collocated directly alongside clinical staff. By doing so, it will bring together clinicians, researchers, educators and public health professionals to drive the rapid translation of research and innovation, expand excellence in health teaching and education opportunities, and improve the patient care experience at Randwick.

## 3 BRIEF HISTORY OF THE SITE AND ITS DEVELOPMENT

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A brief history of the site, and immediate surround context and phases of its development is set out in the HAA, prepared by Casey and Lowe (2019), especially at Section 3. A summary of which is as follows:

- The site's pre-European topographical nature was comprised of swamp, sand hills and scrubby heath.
- Simeon Henry Pearce and brother James Pearce were granted land at the site in 1850.
- Randwick Destitute Children's Asylum was granted 60 acres in 1855. Land to the south-west of the Asylum buildings was undeveloped as was likely deemed unsuitable for cultivation.
- Magill Street is first recorded in 1884.
- Eurimbla Avenue was created through a subdivision plan in 1912. The land along Eurimbla Avenue was then developed for 20<sup>th</sup> Century detached and semi-detached residences with outbuildings and plantings.
- Tubercular Ward to the north-east of the site was constructed in 1919 along with several auxiliary buildings around the Receiving House (built circa 1878).
- The "Sand Dunes" to the north-east of the site was constructed for use as a nurses' quarters.
- Slit trenches were excavated during World War II on location of the present-day Hospital Road (established during the 1970s) in 1942 and then backfilled around 1944.
- The Receiving House, "Sand Dunes" and several auxiliary buildings were demolished in 1977 in preparation for the construction of the Sydney Children's Hospital that opened in 1978.
- The Royal Hospital for Women was completed in 1997.
- Ainsworth Building was completed in 2012.
- Demolition and bulk excavation of all buildings and plantings along Eurimbla Avenue as part of the Project occurred between 2018 and 2019.

## 4 HERITAGE ITEMS AND HCAs LOCATED WITHIN THE SITE

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The NSW State Heritage Inventory and Schedule 5 to the LEP were reviewed as well as the Perumal Murphy and City Plan Heritage Studies. It is noted that the site is not referred to in either of the Studies. As at the date of review, no heritage item(s) or HCA(s) were listed on the State Heritage Inventory or in Schedule 5 to the LEP, or that the site was within an HCA.

## 5 HERITAGE ITEMS AND HCAs LOCATED WITHIN THE CAMPUS

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The following heritage items are located within the Campus as identified in Table 1 and mapped in Figure 1 with the approximate distance from the site included in the table.

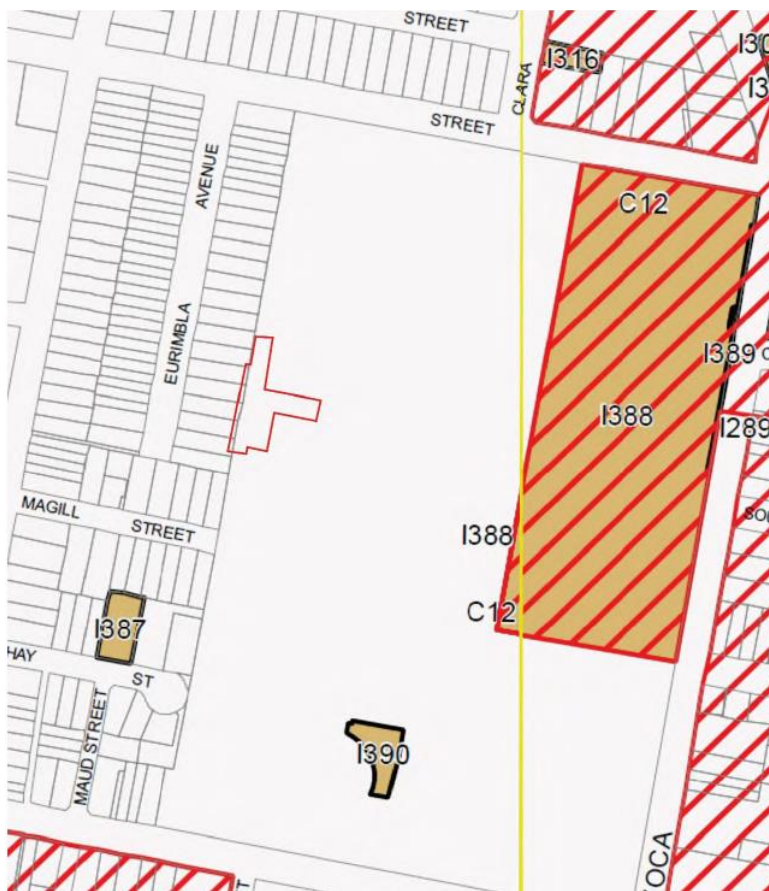
**Table 1: Heritage Items and HCAs located within the Campus**

Address	Item Name	Listing(s)	Significance	Distance
61 High Street, Randwick	The Prince of Wales Hospital / Prince of Wales Hospital (Main Block (Edmund Blackett Building), Catherine Hayes Hospital and Superintendent's Residence)	Section 170 Heritage and Conservation Register LEP (Item No. I388) *	Local	200m
Avoca Street, Randwick	Gates and Fence / Prince of Wales Hospital Gates and Fence	Section 170 Heritage and Conservation Register LEP (Item No. I389)	Local	250m
61 High Street, Randwick	Randwick Destitute Children's Asylum Cemetery	LEP (Item No. I390)	Local	210m
High Street, Randwick	Main Block, former	Section 170 Heritage and Conservation Register	Local	200m
High Street, Randwick	Superintendent's Residence	Section 170 Heritage and Conservation Register	Local	270m
High Street, Randwick	Outpatients Buildings, former	Section 170 Heritage and Conservation Register	Local	240m
-	C12 High Cross Heritage Conservation Area	LEP	Local	200m

\* (Item No. I388) is composed of:

- c1856 Main Block (now known as the Edmund Blackett Building including the courtyard and the Norfolk Island Pine – planted by the Duke of Edinburgh c1868);
- the c1870 Catherine Hayes Hospital Building; and
- the c1867 Superintendents residence and the "*Prince of Wales Hospital gates and fence*" (Item No. I389)

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**Figure 1: Extract of the Heritage Map with the site marked in red (Base Map: the LEP)**

On 28 August 2007, the Council adopted a Register of Significant Trees which identifies and recognises the importance of significant trees in the Randwick landscape. Refer to Figure 2 for the list of significant trees located within the Campus.

**Group A: Avoca Street frontage/ entry gates and vehicular access road**

- 2 № Moreton Bay Figs (*Ficus macrophylla*)
- 2 № Port Jackson Figs (*Ficus rubiginosa* f. *rubiginosa* and f. *glabrescens*)
- 1 № Western Juniper (*Juniperus occidentalis*)
- 1 № Norfolk Island Pine (*Araucaria heterophylla*)

**Group B: Western courtyard to main sandstone building**

- 1 № Norfolk Island Pine (*Araucaria heterophylla*)
- 3 № American Cotton Palms (*Washingtonia filifera*)
- 1 № Dragon's Blood Tree (*Dracaena draco*)
- 6 № Kentia Palms (*Howea forsteriana*)

**Group C: Northern courtyard to sandstone building**

- 1 № Silky Oak (*Grevillea robusta*)

**Other tree and palm components/associates**

- Brush Box (*Lophostemon confertus*)
- Illawarra Flame Tree (*Brachychiton acerifolius*)
- Umbrella Tree (*Schefflera actinophylla*)
- Canary Island Date Palms (*Phoenix canariensis*)
- Washington Palm (*Washingtonia robusta*)

**Figure 2: Summary of scheduled items (significant trees) (Source: Register of Significant Trees)**



While the items, HCA and registered significant trees may be said to be “in the vicinity” of the proposed development, it is considered that due to the distance, location, form and scale of improvements in the space between the site and the heritage items and HCA, the proposed development will have no impact on the heritage values of the heritage items or HCA. Therefore, no further consideration will be given to these items in this SoHI.

## 6 OTHER HERITAGE ITEMS AND HCAs LOCATED WITHIN THE VICINITY OF THE SITE

The site is located within the vicinity of “Cotswold”, late Victorian cottage” (“Cotswold”) (Item No. I387) located approximately 110m south of the site (Figure 1) at 4 Hay Street, Randwick. It is listed as a heritage item (Figure 3) in Schedule 5 of the LEP, however does not include an entry in the State Heritage Inventory. The following physical description from the Randwick Heritage Study<sup>1</sup> is considered to be an appropriate description of the item:

*“The ‘Cotswold’ is a Victorian villa, constructed from rendered and painted masonry, with a slate roof and terracotta ridge tiles. It retains two intact chimneys with chimney pots. The house has a projecting bay, with faceted bay window. The property has an unsympathetic garage addition and dividing wall extending to the street boundary, which projects forward of the building line established by the Victorian house.”*



**Figure 3: View looking north to the front elevation of “Cotswold” (Source: Advisian, 2017)**

<sup>1</sup> Randwick City Council (n.d.). Randwick Heritage Study (Heritage Data Form). Available online at [http://www.randwick.nsw.gov.au/\\_\\_data/assets/pdf\\_file/0007/17269/4-Hay-Street.pdf](http://www.randwick.nsw.gov.au/__data/assets/pdf_file/0007/17269/4-Hay-Street.pdf)

## 7 CMP GRADING OF SIGNIFICANCE FOR CAMPUS ELEMENTS WITHIN THE SITE AND IN THE VICINITY OF THE SITE

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A CMP was prepared in 1997 by Graham Brooks & Associates for lands within the Campus. The CMP defined the grades of significance for elements as follows:

- **Exceptionally high** – of significance relating to the initial, primary establishment of the site or complex.
- **High** – of considerable cultural significance to the wider community and relating to an early stage of site development.
- **Medium** – of some significance to the site as a whole.
- **Low** – of relatively slight significance, particularly when compared to other features.
- **Intrusive** – an intrusive or disruptive element of slight significance which tends to devalue the greater level of significance of adjacent components, areas or buildings.

The Royal Hospital for Women and Sydney Children's Hospital buildings were graded as 'Low' significance. Hospital Road and Delivery Drive were not graded in the CMP; however, it is understood both roads were formed at the same time as the construction of the Sydney Children's Hospital. On this basis, they are considered to also be of 'Low' significance. The Ainsworth Building was not graded as it was built after this CMP and as recent intervention into the Campus, it is considered to be of 'Low' significance.

As the above elements are considered to be of 'Low' significance, Conservation Policy Guidelines in Section 7.3.1 of the CMP states that *"Assets graded as being of low significance or intrusive generally reflect later stages of development. Demolition is acceptable as well as extensive modification, and will have little negative impact on the heritage values of the overall Hospital Campus."*

The core elements of the proposed development which involves modification (bulk excavation, services diversion works and landscaping) to a section of Hospital Road and Delivery Drive, is consistent with the intent of the above guidelines. There are no impacts from the UNSW Eastern Extension and IASB modifications to Campus elements.

## 8 STATUTORY AND NON-STATUTORY CONSERVATION PLANNING CONTROLS

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### ***Environment Protection and Biodiversity Conservation Act 1999***

Under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) a referral is required to the Australian Government for proposed actions that have the potential to significantly impact on matters of national environmental significance or the environment of Commonwealth Land.

The site does not contain any heritage items or HCAs that are identified on the World Heritage List, National Heritage List or Commonwealth Heritage List.

### ***Environmental Planning and Assessment Act 1979***

The EP&A Act is the principal planning legislation in NSW. The proposed development will be assessed under the matters for considerations under Section Part 4, Division 4.7 of the Act.

## **Heritage Act 1977**

The *Heritage Act 1977* contains the provisions for listing sites or places on the State Heritage Register and the protection of relics. There are no sites or places listed on the State Heritage Register or covered by an Interim Heritage Order that are either within the site or within the vicinity of the site. The HHA has addressed the protection of relics provisions of the *Heritage Act 1977*.

## **Randwick Local Environmental Plan 2012**

The objectives under Clause 5.10(1) of the LEP are as follows:

- (a) *to conserve the environmental heritage of Randwick,*
- (b) *to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,*
- (c) *to conserve archaeological sites,*
- (d) *to conserve Aboriginal objects and Aboriginal places of heritage significance.*

Clause 5.10(5)(c) states that a consent authority may require a heritage management document to be prepared that assesses the extent to which the proposed development would affect the significance of a heritage item or HCA that is “*within the vicinity*” of the site. This SoHI is considered a heritage management document and has been prepared in accordance with this provision.

Further, the SoHI has considered the relevant Articles of *The Australia ICOMOS Charter for Places of Cultural Significance, 2013* (The Burra Charter) and the relevant questions outlined in the NSW Heritage Manual’s ‘*Statements of Heritage Impact*’ Guidelines in Section 9 below.

## **9 THE ASSESSMENT**

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### **Randwick Local Environmental Plan 2012**

#### Clause 5.10 – Heritage Conservation

The proposed development is consistent with the objectives (a) and (b) as set out in Clause 5.10(1), including conserving heritage items, HCAs and their setting and views. In relation to objectives (c) and (d) these are addressed in the respective specialist reports.

In accordance with Clause 5.10(5)(c) and Item 8 of the SEARs, this SoHI has considered the effect of the proposed development on the heritage significance of “*Cotswold*”, located “*within the vicinity*” of the proposed development.

While the item may be said to be “*in the vicinity of the proposed development*”, due to the form and scale of improvements located in the space between the site and “*Cotswold*”, the proposed development is considered to have no impact on the heritage significance of the heritage item.

#### **Statements of Heritage Impact (Heritage Office and Department of Urban Affairs and Planning, 2002)**

The ‘*Statements of Heritage Impact*’ guidelines do not contain specific guidelines with respect to development “*within the vicinity*” of a heritage item. The proposed development, through its siting, form and scale, will not impact the heritage item within the vicinity of the site.



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## ***The Burra Charter Articles***

Article 8 Setting and 15 Change of the Burra Charter Articles outlines the requirement to maintain the visual, sensory and spiritual setting of a place of cultural significance by minimising the degree of change. The proposed development will not impact the visual and sensory setting of "Cotswold" through its siting, form and scale, and as confirmed by the shadow diagrams prepared by BVN (2019) for the summer and winter solstice periods.

## **10 CONCLUSION**

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The SoHI has addressed the relevant statutory and non-statutory conservation planning controls identified in Section 9, including:

- Clause 5.10 (5)(c) of the LEP.
- The relevant requirements of the NSW Heritage Manual's *"Statement of Heritage Impacts" Guidelines*.
- The relevant Articles of The Burra Charter.
- Identification of heritage items and HCAs either within the site or within the vicinity of the site.
- Identification and assessment of impacts, if any, of the proposed development on the conservation values of heritage items and HCAs that are within the vicinity of the site.

The consideration of historical archaeological matters is dealt with in the HAA.

The conclusions of the SoHI are as follows:

- There are no heritage items or HCAs within the site.
- The proposed development will not impact on the conservation values of the heritage items and HCAs located "within the vicinity" of the site.

Therefore, it is recommended that on heritage grounds, the proposed development is granted development consent.

Yours faithfully,



**Robert Power**  
**Principal Heritage and Statutory Planner**