



Our ref: DOC19/110341

Mr David Gibson
Team Leader
Social Infrastructure Assessment
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Via email: Teresa.gizzi@planning.nsw.gov.au

Dear Mr Gibson

NOTICE OF EXHIBITION FOR REDEVELOPMENT OF GREENWICH HOSPITAL AT 97-115 RIVER ROAD, GREENWICH (SSD 8699)

I refer to your email dated 11 February 2019 inviting comments on the above State Significant Development concept proposal 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.

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.

The following reports were considered in our assessment:

- *Environmental Impact Statement, Redevelopment of Greenwich Hospital Campus*, prepared by Barker Ryan Stewart, dated January 2019;
- *Statement of Heritage Impact, Greenwich Hospital Concept Plan Redevelopment*, prepared by NBRS & Partners Pty Ltd, dated 5 November 2018;
- *Greenwich Hospital, Archaeological Assessment and Impact Statement*, prepared by GML Heritage, dated March 2018;
- Architectural drawings, prepared by Bickerton Masters; and
- Landscape drawings, prepared by Complete Urban.

As delegate of the Heritage Council of NSW, I provide the following comments:

- It is noted that no works are proposed to Pallister, which ensures significant built fabric would be retained. This approach is supported; however, it is unclear what condition Pallister is in and a schedule of conservation works should be prepared to ensure that the fabric and condition of the historic building is assessed and works to support ongoing conservation are identified and implemented as part of this proposal;
- Views to Pallister from the River Road and St Vincents Road are largely screened by existing development and mature vegetation along the boundaries of the site. Nonetheless, the concept proposal is an opportunity to make Pallister a focal point of

the proposal with adequate setbacks and recognition of views to allow better appreciation of this historic villa. This is particularly important along St Vincents Road as this area is within the curtilage of the item. Whilst it is acknowledged that these views of Pallister from the St Vincents Road entry are somewhat limited, the proposed seniors living villas which would flank this access and view line, would dramatically alter the approach to the heritage item. Whilst it is also recognised that the development – aided by the sloping topography – would be generally lower than Pallister, these seniors living villas would still significantly alter the appreciation of the villa in its landscaped setting. The concept proposal should be altered to relocate the seniors living villas further towards the River Road in the north-eastern section of the State listed curtilage and be no further south than the access road. This design modification would leave the connection to St Vincents Road, and the landscaped setting of Pallister, intact in this area;

- The retention of significant mature trees in the immediate vicinity of Pallister is appropriate and would in a small way help mitigate some of the adverse impacts of the large-scale hospital development on the adjacent lot. While historic access paths, a carriage loop and a better landscaped setting for Pallister have been identified in the SOHI, detail is not yet available and is stated to be the subject of a future application. Research into the historic landscape to inform landscape conservation works and a sympathetic landscaped setting for Pallister would assist in the mitigation of the adverse impacts of the subject concept plan;
- The removal of a large amount of mature vegetation which contributes to the setting of Pallister would adversely impact the significance of the heritage item. By removing the southern seniors living villas, many trees within the curtilage could be retained, positively impacting the future setting of Pallister;
- Despite addressing of the two-storey height of the historic villa with a podium, the scale of the proposed hospital building would dominate Pallister. It is recognised that this is outside the State listed curtilage, however the important views of Pallister from within the site open when travelling along the St Vincents Road access and these would be dramatically altered by the massive height difference between the old and new. Further efforts to mitigate these impacts should be considered including a reduction in height, increased setbacks away from Pallister's north and north-west boundary, and moving the bulk further away from Pallister (towards River Road); this modification would also reduce the overshadowing of Pallister by the proposed hospital structure;
- The seniors living apartments proposed to the west of Pallister should be moved further away from Pallister to create a generous setting where a landscaped buffer zone can help reduce the negative visual impacts of the proposal on views to Pallister;
- It is understood further resolution of the form, detailing and materiality of the development is yet to be undertaken. Whilst contemporary development which does not mimic the historic villa is accepted practice, a holistic approach which considers the significance of the site is important to mitigate negative impacts. An appropriately experienced heritage consultant should be nominated for the project and be part of the detailed design to ensure these heritage issues are considered and sympathetically addressed;
- The proposed basement car parking would encroach into the curtilage of Pallister. This could have an adverse impact on the structural integrity of the historic villa. To mitigate these impacts, the basement car parking should be moved outside the curtilage;
- No comprehensive interpretation strategy for Pallister has been proposed. Interpretation should form part of the proposal to ensure the significance of the place is conveyed to users; and

- **Historical Archaeology:** The GML Historical Assessment has identified there is potential for locally significant archaeological resources to remain in parts of the site (GML, 2018: Figure 5.1, p35). These areas are focused on 'Pallister' in the south of the site and in the connection to River Road along the eastern part of the site within the SHR curtilage. However, the assessment has not clearly explained how the identified archaeological resources would satisfy local levels for the post 19th century and late 19th century features identified in Table 5.2 (GML 2018: p35-36). To confirm that significance and appropriate management responses, the Division supports the approach to undertake earlier physical investigation of the areas of archaeological potential where works involving ground disturbance, as modified by the above Heritage Division comments are adjusted, to inform the final design of the redevelopment. This should also inform the interpretation of Pallister as an item of State heritage significance, which is also recommended above. This approach is supported as the remains in these areas may not retain archaeological research potential, but former remains of e.g. earlier structures such as the observatory, are significant for other values within the SHR site. Interpretation of these elements as a result of earlier archaeological investigative techniques for the site within the broader redevelopment is supported.

Should approval be considered, the following conditions are recommended:

- **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.
- **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.
- **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.
- **Schedule of Conservation Works** - A schedule of conservation works is to be prepared 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.
- **Modified Concept Proposal:**
 - The concept proposal is to 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.
- Landscape Plan - 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 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. The landscape plan must be supported by a heritage impact assessment detailing how the proposed landscaped setting of Pallister respects the significant values of the place and mitigates negative impacts.
- 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. The plan should also incorporate the results of any archaeological investigative program undertaken for the Pallister site.
- Historical Archaeology: The proposed approach to conduct early archaeological testing to understand the archaeological research potential, management in terms of amended design recommendations (as identified in this letter), and to inform the interpretation of Pallister is supported. To assist this the following requirements are recommended (as standard conditions to manage the archaeological activity):
 - 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.

Please note the Communities and Greater Sydney Division of the Office of Environment and Heritage may provide separate comment in relation to Aboriginal cultural heritage.

If you have any questions regarding the above advice, please contact Anna London, A/Senior Team Leader, Regional Heritage Assessments, North at the Heritage Division, Office of Environment and Heritage, via e-mail: anna.london@environment.nsw.gov.au or on telephone: 9873 8608.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Cheryl', with a long, flowing horizontal stroke extending to the right.

CHERYL BROWN

Regional Manager, North

Heritage Division

Office of Environment & Heritage

As Delegate of the NSW Heritage Council

19.03.2019